To,
Shri S. Krishnan
Secretary, Ministry of Electronics and Information Technology
Government of India

31st October, 2025

In Re: Submission of Comments from public on the Draft of *"The Promotion and Regulation of Online Gaming Rules, 2025."*

Respected Sir,

This letter is in reference to the notice issued by the Ministry of Electronics and Information Technology, Government of India, inviting comments from the public on the Draft of The Promotion and Regulation of Online Gaming Rules, 2025. In furtherance of our commitment to contributing to the legal, regulatory, and technological discourse in the country, and working for public welfare in the capacity of law students, the team at the Cell for Law and Technology ("CLT"), National Law Institute University, Bhopal, hereby submits its suggestions in response to the draft rules.

First and foremost, the government's initiative to involve public opinion in shaping the Promotion and Regulation of Online Gaming Rules, 2025 is highly commendable, exemplifying participatory governance in the digital era. The draft rules address a rapidly expanding sector by establishing a structured regulatory framework for recognition and registration of online games, categorization standards, and the functioning of the Online Gaming Authority of India. By embedding strong mechanisms for grievance redressal, safeguards against harmful money-gaming practices, and strict penalties for non-compliance, the rules reinforce user protection and responsible gaming. In doing so, they foster a safe, competitive, and innovation-friendly environment that strengthens the integrity and global competitiveness of India's online gaming ecosystem.

The proposed draft has been thoroughly analysed, and the CLT team has identified a number of key points for consideration, which we have compiled as detailed comments under each mission of the policy. We hope these submissions assist in establishing a transparent, accountable, and growth-oriented framework for India's online gaming ecosystem, ensuring user protection while enabling innovation and fair competition in this rapidly expanding digital sector.

Thank you for your consideration.

Warm Regards,
Dr. Atul Kumar Pandey
(Professor of Cyber Law; Head, Department of Cyber Law; Faculty in Charge, Cell for Law and Technology)

The team which has been instrumental in putting forward this suggestion comprises of the following members of the Cell for Law and Technology, NLIU Bhopal:

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COMMENTS ON THE

PROMOTION AND REGULATION OF ONLINE GAMING RULES, 2025

Rule No.	Sub-Rule (if any)	Provision	Issues Identified	Proposed Solutions
2		Definitions	1. Absence of a defined scope for definitions. The section does not specify whether definitions apply to all types of online games, including skill-based, chance-based, and hybrid models, leading to ambiguity in interpretation. 2. Broad and unclear definition of "Applicant." Currently limited to an "online game service provider seeking registration." It should clarify whether individuals, foreign entities, or intermediaries offering platforms are also eligible applicants. 3. Lack of independence in the "Appellate Authority." The authority is designated as the Secretary, MeitY, which may create conflict of interest and limit impartiality. (In the UK, appeals are made to an independent tribunal the First-	1. Clarify the territorial scope of the Rules. To ensure complete jurisdictional coverage, we recommend adding: "These Rules apply to all online games offered to users in India, whether operated from within or outside India." This would prevent foreign gaming platforms from avoiding Indian regulation, similar to how the UK Gambling Commission oversees offshore operators targeting UK players. 2. Specify eligibility criteria for applicants. To enhance integrity and accountability, we propose modifying the definition as follows: "Applicant" means any online game service provider, through any authorised person, meeting the criteria of

			tier Tribunal (Gambling) ensuring fairness and separation from the executive.) 4. Fragmented regulatory structure under "Central Government." The rules allocate authority to multiple ministries (MeitY, Youth Affairs, and I&B), causing overlap and coordination issues. (In the UK, a single body the Gambling Commission regulates all forms of online gaming for consistency.) 5. Incomplete definition of "Certificate of Registration." The rule lacks details on validity period, renewal process, and revocation grounds, which are necessary for administrative clarity. 6. Dependent and weak grievance redressal mechanism.The "Grievance Appellate Committee" depends on IT Rules, 2021, rather than a specialized or independent online gaming redressal forum. (In the UK, independent ADR (Alternative Dispute	integrity, transparency, and compliance prescribed by the Authority." This would help ensure only credible and compliant operators can apply, deterring shell companies and fraudulent entities. 3. Establish an independent appellate structure. To promote fairness and reduce bureaucratic bias, we recommend constituting an independent body: "An 'Online Gaming Appellate Tribunal' may be established to hear appeals from decisions of the Authority." This mirrors the UK's independent First-tier Tribunal (Gambling), ensuring impartiality in decision-making. 4. Create a unified regulatory structure. To eliminate overlaps between ministries, the definition may be revised as: "Central Government" means the Ministry of Electronics and Information Technology, or any regulatory authority designated by it to exercise functions under these Rules."

			Resolution) bodies handle user complaints, ensuring neutrality and trust.) 7. Overly broad definition of "Online Game Service Provider."The definition does not distinguish between developers, publishers, or platforms that merely host games. It should define responsibility boundaries to ensure accountability. 8. Missing definitions for key terms like "online gaming," "money game," and "gambling." The absence of these foundational terms creates legal uncertainty, especially in distinguishing permissible games of skill from banned games of chance. 9. No reference to data protection or privacy obligations. The definitions do not establish any link with data protection frameworks, even though user data handling is integral to online gaming platforms.	This simplifies governance and aligns India's framework with the UK's single-authority model under the Gambling Commission. 5. Define and regulate the Certificate of Registration more precisely. We suggest refining the definition as: "Certificate of Registration" means the licence issued by the Authority to an online game service provider for a specified period, subject to renewal and compliance monitoring." This introduces accountability and allows regulatory oversight similar to the UK's renewable licensing system. 6. Ensure neutrality in grievance redressal mechanisms. To strengthen user protection, redefine the term as: "Grievance Appellate Committee" means an independent body designated by the Authority to review unresolved user complaints relating to online games." This approach guarantees neutrality between the user and service

				provider, akin to the UK's ADR (Alternative Dispute Resolution) system. 7. Expand the scope of "Online Game Service Provider." To include cross-border operators, add: "Online game service provider includes any person or entity, located in India or abroad, who offers, manages, or controls online games accessible by users in India." This ensures global platforms catering to Indian users are brought under domestic regulation. 8. Introduce precision in core gaming definitions. India should include clear distinctions between "skill-based," "chance-based," and "hybrid" games, similar to UK practice, to avoid regulatory ambiguity and ensure balanced enforcement. 9. Link data protection obligations with gaming operations. Definitions should reference India's Digital Personal Data Protection Act, 2023, to ensure that online

				gaming platforms comply with data privacy standards, given the extensive handling of user data.
3		Recognition and Promotion of e-sport.— (1) Subject to sub-rule (2), the provisions relating to recognition and promotion of e-sport under section 3 of the Act, shall be administered by the Central Government through the Ministry of Youth Affairs and Sports, which may involve suitable measures as may be considered necessary for the purpose. (2) The registration of e-sport for the purposes of sub-section (1) of section 3 of the Act shall be done by the Authority in accordance with rule	1. The phrase "which may involve suitable measures as may be considered necessary" is unclear and lacks specific meaning. It should define what actions or measures are included. 2. The rule does not explain the difference between recognition and registration of e-sports, creating confusion about their separate purposes and procedures. 3. The rule states that recognition will be administered by the Ministry of Youth Affairs and Sports, but registration will be done by an unspecified Authority. This division of responsibility is unclear. 4. The rule does not provide for consultation with stakeholders such as athletes, players, or industry representatives, nor does it require public reporting	1. The rule should specify examples of suitable measures, such as framing guidelines, providing financial or infrastructural support, facilitating tournaments, and promoting e-sports education. 2. The rule should clearly define the difference between recognition and registration recognition meaning acknowledgment of a game as a sport, and registration meaning its formal listing for operation. 3. The rule should clearly define the "Authority," for example, as the E-Sports Regulatory Authority established under a specific section of the Act, to avoid overlap or confusion. 4. The rule should include a clause mandating regular stakeholder consultations and publication of recognized e-

		15.	or transparency. 5. The title mentions both e-sports and online social games, but the rule only discusses e-sports, leaving online social games unaddressed. 6. Rule 3 implies that recognition of e-sport occurs under the Promotion and Regulation of Online Gaming Act, 2025, while Rule 15 clearly states that recognition must be obtained under the National Sports Governance Act, 2025. This creates legal overlap and jurisdictional confusion between two Acts. 7. Neither Rule 2 (Definitions) nor Rule 3 specifies which body the term "Authority" refers to whether it is the E-Sports Regulatory Authority under this Act or another body under the National Sports Governance Act. This leaves the implementation process unclear. 8. Rule 3 states that registration shall be done by the Authority "subject to" sub-rule (2), but it doesn't explicitly specify that recognition must precede registration. Rule 15 clarifies	sports lists online to ensure transparency and inclusivity. 5. The rule should address online social games separately to avoid confusion either by inserting a sub-rule for them or by renaming the rule to focus only on e-sports. 6. Explicitly mention that recognition of e-sport shall be as per the National Sports Governance Act, 2025, while promotion and policy matters shall be handled under this Act by the Ministry of Youth Affairs and Sports. 7. Add a line such as: "'Authority' means the E-Sports Regulatory Authority established under section X of the Act." This removes administrative ambiguity. 8. Amend Rule 3 to explicitly state that registration under this Act can only occur after recognition has been granted under the National Sports Governance Act, 2025. 9. Instead of "suitable measures as may be considered necessary," list concrete

			this relationship, but Rule 3 should reflect it to maintain procedural consistency. 9. The phrase "suitable measures as may be considered necessary" gives the Ministry unlimited discretion without clear boundaries, potentially leading to inconsistent implementation. 10. The rule uses "e-sport" in singular form inconsistently, which may create interpretation issues. It should align with the defined terminology and be used uniformly throughout the rules.	categories of measures to ensure transparency and limit administrative discretion. 10. Use "E-Sports" (plural, capitalized) throughout the rules for uniformity and to align with global usage.
4	4(1)	4.1. The Ministry of Information and Broadcasting (MIB) shall administer measures for the promotion of online social games.	1. The rule overlaps with the functions of the Ministry of Electronics and Information Technology (MeitY), which already regulates online platforms and intermediaries under the IT Act, 2000. This creates confusion over which authority will handle regulation, content oversight, and grievance redressal. Further, the phrase "suitable measures" is vague and provides no guidance on the kind of initiatives to be	1. The rule should clearly define the division of responsibilities between MIB and MeitY, MIB may focus on content standards and advertising, while MeitY can handle platform regulation and user safety. The term "suitable measures" should be elaborated to include actions like supporting game development, promoting safe gaming awareness, and encouraging innovation in

			undertaken.	Indian gaming startups.
	4(2)	4.2. Registration of online social games shall be done by the Authority as per Rule 14.	1. The rule does not specify the registration process, criteria, or timelines, leading to ambiguity for game operators. It is also unclear whether foreign gaming platforms offering services in India are covered under this provision.	1. The registration framework should be detailed, clearly stating eligibility, documentation, processing timelines, and renewal conditions. Cross-border platforms operating in India should be mandated to register or comply through authorized local representatives.
	4(3)	4.3. An online social game may be offered without registration under Part IV.	1. This clause contradicts the previous sub-rule, which requires registration, and may allow unregulated games to operate. It could be misused by commercial platforms to bypass scrutiny by claiming to be "social" or "non-commercial".	1. The exemption should be limited to non-commercial, educational, or purely recreational games. Operators of exempted games should be required to submit a self-declaration confirming the non-commercial nature of their activities, subject to verification by the Authority.
	4(4)	4.4. The MIB may issue codes of practice or guidelines for categorization of online social games to ensure safe and age-appropriate content.	1. The rule empowers MIB to issue codes but does not provide any system to ensure compliance or penalties for violation. Moreover, the rule does not mention whether such codes will align with existing frameworks like the IT Rules, 2021, or involve stakeholder	1. The codes of practice should be made binding, with periodic audits or compliance reports from gaming platforms. They should be harmonized with the IT Rules, 2021 and the Advertising Standards Council of India (ASCI) guidelines to maintain consistency. Public consultation with gaming

			consultation.	industry bodies and child safety organizations should also be made mandatory before issuing such codes.
5	5(1)	5.1. Establishment of the Online Gaming Authority of India by notification of the Central Government.	The rule does not specify a timeline for the Authority's establishment, which may delay operationalization. It also lacks clarity on the administrative ministry under which the Authority will function, creating potential overlap between MeitY and MIB.	The notification should specify the administrative ministry responsible for the Authority and a fixed timeline for its constitution. This will ensure accountability and coordination between existing regulatory bodies.
	5(2)	5.2. The Authority shall be a body corporate with power to acquire, hold, and dispose of property, and to sue or be sued.	1. While the provision grants standard corporate powers, it does not define the Authority's functional independence or the extent of its accountability to the Central Government. Ambiguity in financial autonomy could hinder effective functioning.	1. Include a provision clarifying that the Authority will operate independently in its decision-making but remain subject to government oversight through annual reporting and audit requirements. This ensures both autonomy and accountability.
	5(3)	5.3. The head office of the Authority shall be located in the National Capital Region (NCR).	1. Centralized location may limit accessibility for stakeholders, especially game developers and operators from other regions.	1. Establish regional or virtual offices to ensure nationwide access and timely communication with stakeholders across different States and Union Territories.
	5(4)	5.4. The Authority	1. While progressive, the rule	1. Specify that the digital

		may function as a digital office and adopt techno-legal measures to conduct proceedings without requiring physical presence.	does not mention data protection, digital authentication, or cybersecurity measures for virtual proceedings. Lack of such safeguards may lead to privacy and integrity concerns.	functioning of the Authority will comply with the Digital Personal Data Protection Act, 2023 and relevant cybersecurity standards. Include secure verification and encryption mechanisms for all online proceedings.
6	6(1)	The Authority shall consist of the following Members, to be appointed by the Central Government, namely:—	1. Limited independence and over-representation of Government officials: All Members, including the Chairperson and three Members, are ex officio officers of the Central Government. This creates potential conflict of interest and undermines functional independence of the Authority. 2. Absence of representation from industry or civil society: The Authority lacks inclusion of experts from gaming, technology, child safety, or user rights sectors, which are vital for balanced regulation. 3. No clarity on tenure or reappointment: The rule specifies composition but not the term of service, leading to ambiguity on continuity and	1. Introduce independent members: Include at least two independent experts (from gaming regulation, digital rights, or cyber law) nominated through an open and transparent process. 2. Ensure balanced composition: Mandate representation from non-government stakeholders such as academia, consumer protection, and mental health professionals. 3. Define tenure and reappointment: Prescribe a fixed term (e.g., 3–5 years) with reappointment limited to one additional term to maintain continuity and accountability.

			accountability.	
	6(1)(a)	a Chairperson, ex officio in the rank of the Additional Secretary, Ministry of Electronics and Information Technology or in the absence of an Additional Secretary, such other officer not below the rank of Joint Secretary designated by the Secretary, Ministry of Electronics and Information Technology;	1. Administrative rank may not ensure subject-matter expertise: The Chairperson's eligibility is tied only to bureaucratic rank, not to expertise in online gaming, digital governance, or cyber regulation. 2. Risk of frequent transfers: As serving officers, their tenure may end prematurely due to government transfers, disrupting consistency in regulatory oversight.	1. Add subject-matter qualification: Require experience in technology regulation, gaming law, or digital economy governance. 2. Ensure fixed deputation tenure: Prescribe a minimum term of 3 years for the Chairperson to ensure stability in decision-making.
	6(1)(b)	three Members, who shall be Members ex officio, in the rank of a Joint Secretary to the Government of India, to respectively represent the Ministries or Departments of the Central Government dealing with,— (i) information and (ii) broadcasting;	1. Inter-ministerial overlap without clear functional demarcation: The rule does not define each Ministry's specific role within the Authority, leading to possible administrative confusion. 2. Potential bureaucratic delays: Multi-ministry representation could slow decision-making due to inter-departmental approvals.	1. Define portfolio allocation: Clearly specify in the Rules or subsequent notification the distinct domain responsibilities of each Ministry (e.g., content regulation, sports certification, financial integrity). 2. Streamline coordination: Create an inter-ministerial coordination protocol or standing committee to expedite joint decisions.

		youth affairs and (iii) sports; financial services; and		
	6(1)(c)	two other Members ex officio, not below the rank of Director to the Government of India, out of which at least one Member shall have special knowledge of and experience in law.	1. Insufficient expertise criteria: Merely requiring "special knowledge of and experience in law" is too broad and does not ensure familiarity with data protection, intellectual property, or gaming jurisprudence. 2. Absence of technology or behavioural science expertise: Online gaming regulation requires understanding of addiction psychology, algorithmic fairness, and digital architecture, which are unrepresented.	1. Expand qualification criteria: Include experts in cyber law, technology policy, behavioural science, or financial regulation. 2. Establish expert advisory panels: Constitute sub-committees of external specialists to advise Members on sector-specific issues.
	6(2)	The Central Government shall appoint a Secretary to the Authority, who shall not be below the rank of Director to the Government of India, and who shall discharge such functions as may be assigned to her by the Authority.	1. Concentration of appointment powers: Exclusive appointment by the Central Government may reduce operational autonomy. 2. Undefined functions: The Secretary's role is vaguely defined as "functions assigned by the Authority," leading to inconsistent delegation of administrative powers.	1. Delegate appointment procedure to the Authority: Allow the Chairperson to recommend the Secretary from an approved panel of officers. 2. Codify responsibilities: Define the Secretary's duties, administration, budget control, and coordination, to ensure transparency and accountability.

	6(3)	The Chairperson may call upon such experts as deemed necessary to assist the Authority in the discharge of its functions.	1. Discretionary and non-binding provision: The Rule leaves inclusion of experts entirely at the discretion of the Chairperson, risking ad hoc or selective consultation. 2. No transparency in expert selection: There is no requirement for public notice, criteria, or declaration of conflict of interest for such experts.	1. Institutionalise expert consultation: Mandate that expert panels be empanelled through a transparent process with published terms of reference. 2. Ensure conflict-of-interest declarations: Require experts to disclose any financial or professional interest in online gaming or affiliated industries.
	6(4)	The Central Government shall provide for allowances payable to non-official experts as per norms laid down by the Ministry of Finance.	1. No clarity on remuneration structure: The rule refers generally to “norms laid down by the Ministry of Finance,” without specifying if it applies to consultants or advisory board members. 2. Risk of inadequate compensation: Low allowances may disincentivise participation by highly qualified external experts.	1. Specify honorarium policy: Prescribe a clear remuneration framework for non-official experts commensurate with their professional experience. 2. Encourage diverse participation: Provide flexibility for performance-based compensation to attract top-tier talent from academia and industry.
7	7(1)(a)	the Chairperson shall fix the date, time and place of meetings of the Authority, approve the items of agenda therefor, and	1. Excessive centralisation: All procedural control rests solely with the Chairperson, with no provision for Members to requisition meetings. This may limit internal checks and delay	1. Allow members’ requisition: Insert a clause permitting any two Members to request a meeting if the Chairperson does not call one within 15 days.

		cause notice specifying the same to be issued under her signature or that of such other Member as the Chairperson may authorise by general or special order in writing;	urgent deliberations. 2. No minimum notice period: The Rule omits any timeline for circulation of agenda or notice, risking inadequate preparation time.	2. Fix notice period: Mandate at least seven working days' advance notice and agenda circulation, except in emergencies.
	7(1)(b)	meetings of the Authority shall be chaired by the Chairperson and, in her absence, by the senior-most Member from the Members present during the meeting;	1. Ambiguity in "senior-most": Seniority criterion (by rank or length of service) is undefined, which could create confusion. 2. No provision for rotation or acting Chair: Long absences may stall work without a formally designated Vice-Chairperson.	1. Define seniority: Clarify that "senior-most" refers to rank in the Government of India or date of appointment to the Authority. 2. Provide continuity: Create a Vice-Chairperson position empowered to preside and approve decisions in the Chairperson's absence for more than 30 days.
	7(1)(c)	save as otherwise provided under these rules, one-third of the functional strength shall be the quorum for its meetings;	1. Low quorum threshold: One-third quorum for a six-member body means only two Members can legally decide regulatory matters. 2. No special quorum for major decisions: Critical actions (e.g., penalties or game determinations) could be taken by a minority.	1. Raise quorum requirement: Fix minimum quorum at one-half of the functional strength. 2. Introduce enhanced quorum: Require two-thirds presence for penal actions or policy decisions under Rule 10.

	7(1)(d)	save as otherwise provided under these rules, all questions which come up before any meeting of the Authority shall be decided by a majority of the votes of Members present and voting, and, in the event of an equality of votes, the Chairperson, or in her absence, the person chairing, shall have a second or casting vote;	1. Risk of bias due to casting vote: The Chairperson (already a Government official) gains decisive power in every tie, reducing collegiality. 2. No record of dissent: The Rule does not mandate recording dissenting opinions.	1. Limit casting vote use: Allow casting vote only on procedural issues or require re-consideration for substantive matters. 2. Record dissent: Mandate that dissenting views be entered in minutes and published along with final orders to ensure transparency.
	7(1)(e)	if a Member has any personal interest in any item of business to be transacted at a meeting of the Authority, she shall not participate in or vote on the same, and in such a case, the decision on such item shall be taken by a majority of the votes of other Members present and voting;	1. Narrow conflict-of-interest scope: Only personal interest is covered; institutional or financial conflicts are omitted. 2. No mandatory disclosure procedure: The Rule lacks a requirement to declare such interests in advance.	1. Broaden definition: Include direct or indirect pecuniary, institutional, or professional conflicts 2. Formalise declarations: Require Members to file annual conflict-of-interest statements and recuse themselves when applicable.

	7(1)(f)	in case an emergent situation warrants immediate action by the Authority and it is not feasible to call a meeting of the Authority, the Chairperson may, while recording the reasons in writing, take such action as may be necessary, which shall be communicated within seven days to all Members and laid before the Authority for ratification at its next meeting;	1. Broad discretion without defined emergency criteria: "Emergent situation" is undefined, allowing subjective use of special powers. 2. No timeline for ratification: The Rule requires communication within seven days but not ratification within a specific period.	1. Define emergent circumstances: Limit to situations threatening public safety, financial integrity, or national security. 2. Fix ratification deadline: Require the Authority to ratify or reject emergency decisions within 30 days of issue.
	7(1)(g)	save as otherwise provided under these rules, if the Chairperson so directs, an item of business or issue which requires a decision of the Authority may be referred to Members by circulation and such item may be decided with the	1. Risk of reduced deliberation: Decisions by circulation can undermine collective discussion on complex policy matters. 2. No provision for recording objections: Members who disagree have no formal channel to demand in-person review.	1. Restrict use: Permit decision by circulation only for administrative or procedural matters. 2. Create appeal mechanism: Allow any two Members to request that a circulated matter be re-opened for discussion at the next meeting.

		approval of majority of the Members;		
	7(1)(h)	the Chairperson or any Member of the Authority, or any Member authorised by her by a general or special order in writing, may, under her signature, authenticate its order, direction or instrument.	1. Authentication without peer review: Individual Members may authenticate orders without collective verification, risking procedural errors. 2. No digital-signature requirement: The Rule does not specify use of secure e-signature protocols for authenticating digital documents.	1. Introduce dual authentication: Require countersignature by the Secretary for legally binding orders to avoid unauthorised issuance. 2. Specify digital security: Mandate use of certified digital signatures compliant with the Information Technology Act, 2000 for all online documents.
	7(2)(a)	(a)any vacancy in or any defect in the constitution of the Authority; (b) any defect in the appointment of a person acting as the Chairperson or other Member of the Authority; or (c) any irregularity in the procedure of the Authority, which does not affect the merits of the case.	1. Overbroad savings clause: The Rule grants blanket validation to procedural irregularities without clear threshold for "affecting the merits." 2. Potential to shield unlawful actions: It could be invoked to legitimise decisions taken without proper quorum or due process.	1. Qualify savings clause: Limit its application to minor technical defects and exclude violations of quorum or conflict-of-interest rules. 2. Mandate post-facto validation: Require the Authority to record and rectify such irregularities at the next meeting.
8		8.1 Terms and conditions of	1. Expertise and Continuity Gaps: Over-reliance solely on	1. Mixed Staffing & Direct Hire: Create a mixed staffing

		appointment and service of officers and employees of the Authority. 8.2 The Central Government may, by general or special order, provide such officers and employees drawn by deputation from Ministries and Departments of the Central Government as deemed necessary for the efficient discharge of the functions of the Authority.	deputation is temporary, risking loss of institutional memory and failure to retain specialized digital/technical expertise. 2. Lack of Independence & Stability: Silence on fixed tenure, removal safeguards, transparent selection, and market-aligned pay compromises regulatory independence and stability. 3. Regulatory Capture Risk: The absence of mandatory conflict of interest (COI) safeguards (disclosure and cooling-off periods) increases the risk of regulatory capture. 4. Ineffective State/Enforcement Coordination: No provisions for dedicated staff or mechanisms for coordination with State Governments, banks, and law enforcement agencies.	model (deputation, fixed-term, lateral hires) and empower the Authority to recruit fixed-term technical specialists. 2. Fixed Tenure & Transparency: Mandate minimum fixed tenures (e.g., 3 years) for senior posts and establish an Appointments Committee with transparent selection criteria. 3. COI Safeguards: Add mandatory public disclosures and a 2-year cooling-off period for officers moving to regulated entities. 4. Liaison Posts: Create a Chief Technical Officer (CTO) post and dedicated State Liaison Cells to coordinate effectively with enforcement and state bodies.
9		9.1 Powers of the Chairperson. (a) general	1. Unchecked Power Concentration: "General superintendence" is too broad,	1. Limit Scope: Define "general superintendence" to exclude quasi-judicial

		superintendence... (c) authorize performance of any of the functions... by an individual Member or groups of Members…	risking concentration of operational control and weakening collegiate decision-making. 2. Lack of Transparency & Accountability: The rule lacks requirements for written reasons, publication, or post-hoc ratification of the Chairperson's directions or delegated decisions. 3. Safeguard-less Delegation: Delegation to a single Member (Rule 9(c)) lacks safeguards (e.g., quorum, recusal checks) for high-stakes decisions like penalties or cancellation. 4. Conflict of Interest (COI) Gap: The powers are not explicitly tied to COI rules, leaving administrative and delegated decisions vulnerable to conflicts.	functions reserved for the Authority (Rule 10). 2. Mandatory Transparency: Require all Chairperson directions and delegated orders to be in writing, state reasons, and be published on the Authority's website within seven days. 3. Minimum Quorum/Review: Require a two-Member panel or prior Authority approval for delegated decisions involving cancellation or penalties above a defined financial threshold. 4. Tie to COI Rules: Explicitly mandate that the Chairperson and any Member exercising delegated authority must comply with recusal and conflict-of-interest rules.
10		10. Notwithstanding anything contained in the Bharatiya Nagarik Suraksha	1. The clause treats regulatory non-compliance as a serious crime. Sections 5 and 7 relate to offering or facilitating online-	1. We suggest re-classifying offences as non-cognisable and bailable except where they involve serious elements such

		Sanhita, 2023, offences under section 5 and section 7 shall be cognizable and non-bailable.	money-gaming services, which are primarily economic activities. Making these offences cognisable and non-bailable blurs the line between commercial offences and violent crime. 2. The non-bailable nature of these offences might discourage operators and investors in related lawful sectors such as e-sports, casual gaming, and ad-tech. 3. Allowing arrest without warrant in a domain that has historically been under State jurisdiction (such as betting and gambling) raises serious constitutional concerns and lacks procedural safeguards.	as organised fraud, money-laundering, or terror funding. 2. Require prior written approval from the Online Gaming Authority before registration of an FIR or arrest. 3. Limit arrest powers to repeat or aggravated violations involving fraud or laundering. 4. We recommend publishing Standard Operating Procedures (SOPs) which must clearly specify digital-forensics standards, approval layers, and audit logs to maintain proportionality and transparency.
11		11. (1) Where an offence has been committed by a company, every person who, at the time the offence was	1. The phrase "every person in charge of and responsible to the company" is undefined and may expose individuals who lack decision-making authority. 2. The clause requires the	1. We suggest defining the "person responsible" narrowly, thus limiting liability to individuals who have direct supervisory or operational control over the gaming business; using language

		committed was in charge of, and was responsible to, the company for the conduct of that part of the business of the company as well as the company, shall be liable to be proceeded against and punished accordingly. (2) Nothing contained in sub-section (1) shall render any such person liable to be proceeded against and punished accordingly under this Act, if he proves that the offence was committed without his knowledge or that he had exercised all due diligence to prevent	accused to prove lack of knowledge or due diligence, which reverses the presumption of innocence recognised under Article 21. 3. The section overlaps with Section 85 of the IT Act 2000, which risks conflicting interpretations and forum-shopping. 4. The scope of protection for nominee directors or board observers is uncertain.	similar to Section 149 of the Companies Act, 2013. 2. Place the burden of proof on the prosecution to establish knowledge, consent, or negligence beyond reasonable doubt before shifting any evidentiary burden to the accused. 3. Clarify that this provision shall operate subject to the Companies Act and the IT Act to avoid overlapping and conflict in jurisdiction. 4. Expand the safe harbour to include nominee directors and board observers not involved in day-to-day decisions. 5. We suggest that the Online Gaming Authority should also publish clear guidelines or SOPs on assessing “consent,” “connivance,” and “neglect,” to ensure they are applied consistently and fairly.

		the commission of such offence. (3) Notwithstanding anything contained in sub-section (1), where an offence under this Act has been committed by a company and it is proved that the offence has been committed with the consent or connivance of, or is attributable to any neglect on the part of any director, manager, secretary or other officer of the company, such director, manager, secretary or other officer shall be deemed to be guilty of the offence and shall be liable to be proceeded against and punished accordingly:		

		Provided that nothing in this sub-section shall hold an independent director or a non-executive director of a company who is not involved in the actual decision making, liable for such offence.		
12		Require online game service providers to submit digital applications for recognition of online social games or e-sports with details on game description, category, target age, revenue model, user safety, and grievance mechanisms, along with an undertaking of legal compliance. Allow the Authority to request additional information or	1. Ambiguity in required details, causing confusion or inconsistent submissions. 2. Delays due to corrections or additional information extending application timelines. 3. Renewal ambiguity for online social games, risking lapses in registration and legal uncertainty.	1. Publish a comprehensive checklist on the Authority's website detailing all mandatory and optional requirements, with examples, templates, FAQs, and step by step guidance to help applicants prepare complete applications. 2. Introduce fixed timelines for submitting additional details or corrections, supported by an online portal with real time application tracking, automated notifications and a helpdesk to assist applicants in resolving issues promptly.

		corrections and enable renewal through fresh applications.		3. Make renewal mandatory for all online social games with automated email/SMS reminders before expiry. A simplified one click digital renewal process and clear instructions on required documents to prevent lapses and ensure uninterrupted compliance.
13		Empower the Authority to determine if an online game is a money game or e-sport, considering stakes, payments, and rewards. E-sport determinations require Ministry of Youth Affairs and Sports concurrence and compliance with the National Sports Governance Act, 2025. Online money games must cease operations, halt promotion, and be reported, while eligible games may be registered with a	1. Ambiguity in classifying games as online money games or e-sports, leading to inconsistent determinations. 2. Dependence on multiple approvals and recognitions (For example- National Sports Governance Act) can delay the registration process. 3. Lack of clear communication on outcomes and enforcement actions for online money games, creating confusion among service providers.	1. Develop clear, published guidelines and examples outlining what constitutes an online money game versus an e-sport including all financial transactions and rewards to ensure consistent and transparent determinations. 2. Establish a streamlined verification process with fixed timelines for obtaining necessary approvals and recognitions, supported by an online portal to track status and upload required documents. 3. Implement an automated notification system to inform providers of determinations, required actions, and enforcement measures, accompanied by publicly accessible lists of online

		Certificate of Registration.		money games and detailed reasoning for decisions to ensure transparency and compliance.
14	14(1)	14(1) Upon receipt of an application under sub-rule (1) of rule 12 and where a determination has been made under sub-rule (8) of rule 13 that the online game is an online social game, the Authority shall register such online social game within a reasonable time not exceeding ninety days from the date on which the application was first made under sub-rule (1) of rule 12.	1. The rule does not clearly state whether registration is automatic once the Authority determines the game as an online social game under Rule 13(8). 2. The term "reasonable time" is vague and may lead to inconsistent processing timelines. 3. There is no provision for dealing with incomplete or incorrect applications. 4. Applicants are not assured of updates or communication during the registration process.	1. Specify that registration shall be initiated automatically once the Authority's determination under Rule 13(8) is finalized. 2. Replace "reasonable time" with a clear internal timeline within the ninety-day period, such as specific stages for scrutiny and approval 3. Provide that the Authority may issue a notice to the applicant to rectify deficiencies, with the ninety-day period paused during such correction 4. Mandating the use of a digital tracking system where applicants can view real-time updates on the application status.
	14(2)	14(2) Where the Authority has decided on a suo moto basis that an	1. The rule does not specify the procedure or time limit for registration after a suo motu	1. There should be a prescribed, definite timeline, such as within thirty days, for completing registration once

		online game is an online social game under clause (a) of sub-rule (7) of rule 13, and the provider of such game has made an application for registration under sub-rule (1) of rule 12, the Authority shall recognise and register the online social game.	determination. 2. The provider has no opportunity to respond to or clarify the suo motu determination. 3. Lack of coordination between the suo motu determination and registration process may cause delays.	the provider applies to a suo motu determination. 2. Introduce a brief representation or clarification stage for the provider before final recognition and registration. 3. To ensure efficiency and avoid duplication of steps, it is suggested to integrate the suo motu determination and registration process on a single digital platform
15	15(1)	15(1) Where an application from an online game service provider is received under sub-rule (2) of rule 12 or in accordance with clause (b) of sub-rule (7) of rule 13, the Authority shall register the e-sport upon providing a proof of recognition of e-sport under the National Sports Governance Act, 2025 (25 of 2025)	1. The rule does not differentiate between e-sports that are newly recognised and those already recognised under the National Sports Governance Act, 2025, which could cause confusion about eligibility for registration. 2. The Authority's role after receiving proof of recognition is not detailed, it is unclear whether it involves independent verification or merely record-based approval. 3. The rule mentions a ninety-day limit but lacks clarity on	1. Require the Authority to maintain an official record noting the start, suspension, and resumption dates of the ninety-day period. 2. Mandate that applicants notify the Authority within a fixed time once recognition is granted, attaching relevant proof. 3. Provide that the registration timeline shall automatically resume from the date of receipt of valid recognition documents. 4. It is suggested to insert a

		within a reasonable time not exceeding ninety days from the date on which the application as first made under sub-rule (2) of rule 12.	what procedural steps fall within this timeframe, such as scrutiny, verification, or final registration. 4. The absence of a communication protocol leaves applicants uncertain about the stage of their application or reasons for delay.	provision allowing the Authority to reject or return applications where recognition documents are incomplete, invalid, or submitted beyond a reasonable delay
	15(2)	15(2) Any time taken to obtain recognition under the National Sports Governance Act, 2025 (25 of 2025) in accordance with clause (b) of sub-rule (7) of rule 13 shall be excluded from the ninety-days under sub-rule (1).	1. The rule allows exclusion of time taken for recognition but provides no mechanism for documenting or confirming the actual duration of that process. 2. It does not specify which party, the Authority or the applicant, bears responsibility for reporting when recognition is granted. 3. There is ambiguity about whether the ninety-day period automatically resumes after recognition or begins only after official confirmation by the Authority. 4. The rule lacks any reference to the handling of delayed or incomplete recognition submissions, which	1. Require the Authority to maintain an official record noting the start, suspension, and resumption dates of the ninety-day period. 2. Mandate that applicants notify the Authority within a fixed time once recognition is granted, attaching relevant proof. 3. Provide that the registration timeline shall automatically resume from the date of receipt of valid recognition documents. 4. It is suggested to insert a provision allowing the Authority to reject or return applications where recognition documents are incomplete,

			may prolong the process.	invalid, or submitted beyond a reasonable delay
16	16(2)	16.2 The Certificate of Registration issued under sub-rule (1) shall be valid and subsisting for such a period up to five years as chosen by the online game service provider at the time of making an application,	1. A game's Certificate of Registration remains valid for up to five years unless suspended or cancelled. But if the game's operational algorithm changes significantly, especially in ways that(a)Increase randomness or bias(b)Reduce player control or predictability (c) Shift the game from skill-based to chance-based post-registration. This creates a loophole where games can evolve into (sec 17)gambling-like formats without regulatory scrutiny. 2.For Publicly listed companies, investors rely on formal disclosures. This would effect the discretion of investors as to whether (in case of renewal and procedural compliance for the registration effect the value of the company) the company is registered or is perturbed by some registration failure.[Sec 16(4) and 20]	1.Proposed solutions are-(a)Scheduling periodic audits or (b) embedding evaluating mechanisms (by the virtue of sec 69 IT Act 200) post registration of games ,monitoring the algorithms that govern user engagement and the monetary input or exchange 2.Introduce a uniform , periodic season for certificate registration depending on standard registration chosen in categorically (registration time) segregated company, not singling out some arbitrary company rather ,the whole market .

	16(5)	16.5The Authority shall maintain and publish a list of online social games and e-sports registered under these rules in the National Online Social Games and E-sports Registry, along with the names of their online game service provider and associated details.	1.Privacy and gaming operations: The term 'associated details' leaves certain ambiguities and possibility for publication of anti competition details (algorithms running gaming softwares are usually opaque in the present scenario) that might disturb the market of gaming and change the landscape . 2.Explanatory notes under PROG Act say-It has been clarified that an online social game can be offered without a registration under Part IV, thus making registration for online social games voluntary.	1.While increasing transparency might protect consumers , the gaming sector has a right to practice and protect its trade as is provisionally granted by the constitution (Art 301)therefore protecting operational details of gaming platforms. 2.A lot of gambling games might abuse this lacuna and disguise themselves as 'social game'that the government seek s to rather promote.
17	17(1)	17.1 (1) Any time after the receipt of a Certificate of Registration, the online game service provider shall inform the Authority, in such form and manner as the Authority may	1. 'Material changes' maybe be construed in multiple ways .If the game's operational algorithm changes significantly([17(b)], especially in ways that(a)Increase randomness or bias(b)Reduce player control or predictability (c) Shift the game from skill-	1.Proposed solutions are-(a)Scheduling periodic audits or (B) embedding evaluating mechanisms (by the virtue of sec 69 IT Act 200) post registration of games monitoring the algorithms that govern user engagement and the monetary input or exchange

		provide	based to chance-based post-registration. This creates a loophole where games can evolve into gambling-like formats without regulatory scrutiny.	
18	18(1)	18 (1) A Certificate of Registration issued under rule 16 shall be liable to be cancelled where,— (a) there has been a material change in the online social game or e-sport for which the Certificate of Registration was granted which would make it an online money game; or (b) there has been repeated or continued violations of directions applicable to it under sub-section (3) of section 8 of the Act; or (c) in case of an e-sport, the online game service provider has failed to	1. Material change is a broad term and undefined beyond a generic explanation in rule 2(h). 2. Repeated or continued violations does not mention the number of breaches or the duration that amounts to "continued" violation. 3. In 18(1)(d), "other laws" is excessively broad. An unrelated legal violation could lead to cancellation.	1. Proper explanation of what counts as a material change should be listed. 2. A clear number and timeframe of violation with a warning period should be defined. 3. The rule should specify that a "violation of any other law" is only a ground for cancellation if it directly impacts user protection, game integrity, or financial fairness.

		provide information confirming the validity of recognition under the National Sports Governance Act, 2025 within such timeline as specified by the Authority; (d) there has been a violation of the provisions of the Act or rules made thereunder or any other law for the time being in force relating to online social games or e-sports.		
	18(2)	18.2) The Authority may, suo moto or upon receipt of a complaint in relation to a registered online social game or e-sport alleging all or any of the grounds under sub-rule (1), — (a) where it is prima facie satisfied that there is adequate information with it	1. The rule's reliance on the undefined and subjective criterion of "adequate information" as a basis to initiate a full-scale inquiry without prior notice undermines idea of natural justice. 2. The Authority can choose between a strict immediate procedure or a lenient consultative one without any clear standards. This unchecked choice creates an arbitrary	1. A specific criteria and a mandatory notice period should be required before initiating any inquiry to ensure fairness. 2. The rule should be modified to establish a single, standardized procedure that mandates a notice period in all cases, removing the Authority's arbitrary choice between different procedural paths.

		that any or all grounds under sub-rule (1) are being met, initiate inquiry under sub-rule (4); or (b) where it requires further information to make an assessment, issue a notice to the concerned online game service provider setting out the grounds and, in case of complaint, enclose a copy thereof and allow the online game service provider with an opportunity to make a representation and submit such details as may be necessary in relation to the grounds within fifteen days from the receipt of the notice.	procedural gap and allows inconsistent enforcement of the rule.	
	18(3)	18 (3) Where notice is issued under clause (b) of sub-rule (2), the Authority shall, consider the representation and	1. Creates legal uncertainty by permitting the Authority to initiate new inquiries and fresh determinations after reviewing the service provider's defense. This allows the scope of	1. Any inquiry under this provision must be limited to the original grounds stated in the initial notice. This would ensure procedural fairness and prevent the introduction of new

		submission made by the online game service provider along with the complaint or non-compliance identified by the Authority suo moto, and,— (a)where no grounds for cancellation under sub-rule (1) are being made out, dismiss the complaint or, where cancellation was initiated suo moto, terminate proceedings; or (b)where it is satisfied that a prima facie case is made out, initiate an inquiry providing the concerned online game service provider with an opportunity of being heard and may include a fresh determination under rule 13.	proceedings to be expanded beyond the original allegations.	allegations after the defense has been submitted.
	18(6)	18 (6) Where an inquiry is initiated	1. Harmful practices such as data breaches or unfair terms	1. The rule should mandate decisive regulatory action for

		under clause (a) of sub-rule (2) or clause (b) of sub-rule (3), the Authority may, upon the conclusion of such inquiry, by order in writing,— (a)where no grounds for cancellation under sub-rule (1) are being made out, terminate the proceedings under this rule and where applicable, dismiss the complaint; (b)where there is non-compliance under the Act not covered under Chapter III of the Act, direct the online game service provider to remedy such non-compliance and demonstrate compliance to the satisfaction of the Authority; or (c)where it determines that the registered online social game or e-sport has undergone a	can persist without mandatory action from the Authority, weakening user protection and integrity in the online gaming ecosystem. 2. The singular remedy of a "directive to comply" for major violations offers no real deterrence. Without clear provisions for penalties or suspension, the rule fails to prevent conduct that harms users and erodes trust in the regulated gaming market. 3. The overly broad power to direct third parties like banks without clear limits could lead to disproportionate and economically disruptive enforcement.	all serious violations, including compulsory penalties, suspension, or cancellation in cases such as data breaches and unfair terms. 2. The rule should include an explicit and graduated penalty structure, giving the Authority clear power to impose financial penalties or suspend registration for major violations to deter user harm and uphold market integrity. 3. The rule should include specific safeguards and proportionality tests, limiting the Authority's power to direct third parties only to cases strictly necessary for protecting user funds, with such directives narrowly tailored to avoid disrupting legitimate financial services.

		material change and qualifies as an online money game, it shall,— (i) cancel the Certificate of Registration; (ii) initiate any or all of the actions as under sub-rule (4) of rule 13; and (iii)direct the online game service provider, or any other person providing any service to the online game service provider in relation to such online game, including banks, financial institutions, or any other person facilitating financial transactions or authorisation of funds to do any act or refrain from doing any act in the user interest.		
19	19(1)	19(1) Suspension of Certificate of Registration of an online social game or e-sport.— (1) The	1. Clause (a) allows suspension merely when an inquiry is "contemplated," creating an unreasonably low threshold that enables action before any	1. Suspension should be allowed only after a preliminary review shows a prima facie case, rather than just when an inquiry is

		Authority may, suo moto or upon receipt of a complaint in relation to a registered online social game or e-sport, suspend the registration of an online social game or an esport, by order in writing, where,— (a) an inquiry is contemplated under clause (a) of sub-rule (2) of rule 18; (b) a direction has been issued under clause (b) of sub-rule (6) of rule 18, which suspension shall remain effective till such time she remedies the non-compliance to the satisfaction of the Authority, and in case of non-compliance with the direction seeking compliance, she may be liable to penalty under section 12 of the Act; (c) the online	evidence or formal investigation, resulting in disproportionate measures that can unjustly harm businesses and weaken regulatory predictability. 2. Clause (b) keeps suspension in force until compliance without requiring the Authority to verify the validity of its directive or consider the provider's defense. 3. Clauses (c) to (g) use broad terms like "false or incorrect statement" and the catch-all "violation of any other law," allowing suspension even for unintentional errors and creating regulatory uncertainty and scope for arbitrary enforcement.	planned, ensuring actions are based on evidence and not on assumptions. 2. The rule should include a post-suspension review mechanism requiring the Authority to hold a hearing within seven days of suspension, allowing the service provider to contest the directive while ensuring swift action in the public interest. 3. The rule should define "false or incorrect statement" as a deliberate material misrepresentation and restrict "violation of any other law" to offenses directly affecting user protection or game integrity, ensuring enforcement targets serious breaches and avoids arbitrary action.

		game service provider has made a false or incorrect statement in or in relation to the application for registration under rule 12; (d) the online game service provider has failed to pay a penalty imposed under the Act or under the National Sports Governance Act, 2025 (25 of 2025), as applicable; (e) the online game service provider has not complied with the directions, orders, codes of practice or guidelines issued under the Act or under the National Sports Governance Act, 2025 (25 of 2025), as applicable; Page 13 of 17 (f) in case of an e-sport, the online game service provider has failed to provide information		

		confirming the validity of recognition under the National Sports Governance Act, 2025 within a reasonable time; or (g) there has been a violation of the provisions of the Act or rules made thereunder or any other law for the time being in force relating to online social games or e-sports.		
	19(2)	19(2) Where a suspension order has been issued on any ground under clause (a) or clause (b) of sub-rule (1), the Authority shall review such order of suspension periodically and in any case every thirty days from the date of issuance of the suspension order was first issued and, —	1. There is no upper limit specified for the suspension to last. 2. The term "without undue delay" sets no clear deadline which will result in long period suspension without a formal process. 3. No active resolution to lift the suspension in case of the inquiry not progressing or if the provider has taken major steps to comply.	1. The rule should clearly state that a suspension cannot last more than 90 days unless the Authority holds a hearing and issues a final order or begins cancellation proceedings. 2. A spedific timeframe should be introduced like initiation of a formal inquiry within 15 days of the suspension order. On failure, there will be an automatic revocation of the suspension. 3. The rule should make the 30-day review an active

		(a) where suspension order is issued in relation to clause (a) of sub-rule (1), it shall ensure that inquiry under clause (a) of sub-rule (2) of rule 18 is initiated without undue delay; or (b) where suspension order is issued in relation to clause (b) of sub-rule (1), ensure that non-compliance is remedied within the timeline so directed and in case of repeated or continued non-compliance, it may proceed for cancellation as under clause (b) of subrule (1) of rule 18.		assessment where the Authority must decide if the reasons for suspension still exist and lift it if they don't, such as when the inquiry has stalled or the provider has made clear progress toward compliance.
	19(4)	19(4) Upon receipt of the representation and submissions from the online game service provider under clause (c) of sub-rule (3), the Authority shall,	1. The phrase "where necessary" in clause (a) gives no clear rule for when suspension is justified after the provider's defense, allowing decisions to be arbitrary and unpredictable.	1. The rule should state that suspension at this stage is justified only when an imminent risk to users' interests or market integrity is proven and the provider's response fails to address that risk.

		consider the representation so made by the online game service provider, along with the complaint or non-compliance identified by the Authority suo moto and such other further information as the Authority may require the online game service provider, complainant or any person providing any service to the online game service provider to furnish, and — (a) where necessary, it may suspend the Certificate of Registration by order in writing; or (b) where no grounds under clause (c) to (g) of sub-rule (1) are being made out, terminate proceedings under sub-rule (3); (c) where there is non-		

		compliance under the Act not covered under Chapter III of the Act, direct the online game service provider to remedy such non-compliance and demonstrate compliance to the satisfaction of the Authority, which suspension shall remain valid till such time the non-compliance is remedied to the satisfaction of the Authority and in case of continued non-compliance, proceedings under rule 18 may be initiated.		
20		Surrender of Certificate of Registration: It covers the surrender of a Certificate of Registration by an online gaming intermediary. It lets a	1. No mandatory settlement of user funds before surrender. Implying, surrender can leave user balances unpaid. 2. Surrender can be used to evade enforcement (asset dissipation) 3. No data retention / stakeholder-notify requirement.	1. Audit & settlement before acceptance: No surrender shall be accepted unless the applicant furnishes a certified reconciliation of user wallet balances and pending payouts by an Authoritative auditor, and provides an escrow, bank guarantee or

		registered gaming platform stop operations voluntarily by applying to the Central Government or the designated Authority. However, surrender does not remove any liabilities or legal proceedings that occurred before it is accepted.	Leading to risk of lost logs, unclear notice to users.	Authoritative repayment plan to cover outstanding liabilities. 2. Interim preservation & successor restriction: On filing a surrender the Authority may issue interim directions to freeze accounts, place specified funds in escrow, and prohibit transfer of control or customer databases pending final disposal. Acceptance may be conditioned on a 24-month(or whichever is reasonable/effective/feasible) restriction on promoters from launching substantially similar services without prior Authority approval. 3. Data retention & notification:The provider shall preserve all game and transaction records for three years(or whichever is reasonable/efficient/feasible) after surrender filing and, within five days of filing, notify registered users and payment partners. The

				Authority shall update the public Registry status (active / surrender-filed / surrender-accepted) within a stipulated period.
21		Rule 21- Scope and manner of holding inquiry for imposition of penalty under section 12: It explains how the government can investigate and penalize an online gaming platform if it breaks the rules. It describes the process, which includes issuing a notice, allowing the platform to respond, conducting an inquiry, and then deciding the penalty. The goal is to ensure that actions are taken fairly, with due process, and not blindly.	1. No binding technical/forensic standard for digital evidence- disputes over logs and timestamps is likely. 2. Penalty discretion lacks objective yardstick; procedural stages lack firm timelines & transparency.	1.Digital Forensics Protocol: The Authority shall publish a binding Digital Forensics & Evidence Protocol prescribing chain-of-custody, hashing/timestamping, imaging and minimum forensic scope; preservation notices and seizure actions shall conform to the Protocol. 2.Penalty matrix, timelines & publication: The Authority shall publish (i) a non-binding Penalty Matrix linking fines to objective metrics (ex- % offending turnover, user loss), with mitigation credits for self-reporting and restitution; (ii) a procedural timetable (show-cause within 15 days; reply 15–30 days; hearing within 14 days of reply where practicable; final order

				ordinarily within 90 days); and (iii) anonymised summaries of final orders explaining factors and quantum.
22		Rule 22 provides that penalties imposed under the Rules, if unpaid, may be recovered as arrears of land revenue and that such penalties are to be credited to the Consolidated Fund of India.	1. Lack of Procedural Clarity in Recovery Mechanism. 2. No Provision for Public Accountability of Collected Penalties. 3. No clarity on the amount of penalty imposed	1.The rule should clearly list down the Authority or a duly authorised officer to be the entity responsible for initiating recovery proceedings. It should further incorporate a well-defined procedural framework, comprising issuance of a demand notice, provision for representation by the concerned party, and a stipulated timeline for compliance for a smooth recovery system. 2.Mandate the Authority to publish an annual statement detailing penalties imposed, recovered, and pending. This disclosure can form part of the annual report under Rule 25. Such transparency would ensure accountability and reinforce the regulatory legitimacy of the framework.

				This would ensure that the Authority is functioning in the intended manner and would grant assurance to the general public. 3.The determination of penalty to be imposed depends on factors which are subjective and arbitrary in nature, varying on a case-to-case basis. The rules should introduce a graded system, wherein there would be a band of penalty distinguished on the basis of minor procedural lapses and serious breaches.
23		Rule 23 mandates every online game service provider to maintain a grievance redressal mechanism and allows aggrieved users to appeal to the Grievance Appellate Committee (GAC) and further to the Authority within prescribed timelines.	1. Lack of Defined Timelines for Primary Grievance Resolution. 2. Absence of Enforcement Mechanism for GAC Orders	1.The rule should clearly fix a timeline for primary grievance redressal such as fifteen or twenty days. Mere mention of "specified time period" creates ambiguity and may result in delays. 2.Authorize the GAC to forward instances of non-compliance to the Authority for imposition of penalties under Rule 21 or for suspension under Rule 19. Explicitly

				linking redressal outcomes with regulatory enforcement will make the grievance system meaningful and deterrent.
24		Rule no. 24 allows remittance of user funds held by banks and financial institutions before the Act's enforcement without violating online money gaming restrictions. This provision expires 180 days after the Act's enforcement.	1. The 180-day window may be inadequate for users to identify, claim, and receive their funds, especially in cases involving disputes, high claim volumes, or users unaware of their entitlements. 2. The rule does not specify how users will be informed about eligible funds or prescribe standardised procedures for banks and financial institutions to identify, verify, and process claims, leading to inconsistent implementation. 3. The rule does not address what happens to funds that remain unclaimed after the 180-day period expires, creating uncertainty and potential permanent loss of user funds. 1.	1. Extend the period to at least 365 days and empower the Central Government or Authority to grant further extensions in exceptional circumstances. Unclaimed funds post-expiry should be transferred to a Consumer Welfare Fund while allowing users to claim them subsequently through a simplified process. 2. Create a dedicated online portal where users can check eligibility and file claims. Mandate banks, financial institutions, and gaming platforms to upload details of user funds within 30 days of enforcement, with prescribed timelines for acknowledgement (7days), verification (30 days), and remittance (60 days). 3. Require entities holding user funds to submit monthly reports to the Authority detailing claims received, processed, pending, and funds

				remitted. Non-compliance should attract penalties under section 12 of the act, ensuring accountability and timely fund recovery.
25		Rule no. 25 says that the Authority shall prepare an annual report of it's activities and forward it to the Central Government within 180 days after the financial year ends, following adoption at a meeting of the Authority.	1. The 180-day deadline results in significant delays in information availability, reducing the report's timeliness and relevance for stakeholders and policymakers. 2. The rule does not prescribe specific components as financial statements, performance metrics, enforcement actions, complaint stastics, or industry trend analysis, potentially leading to incomplete reporting. 3. The rule mandates submission only to the Central Government without requiring public dissemination or parliamentary tabling, limiting transparency and democratic accountability.	1. Shorten the submission deadline from 180 days to 90 days after the financial year ends to ensure timely availability of information. Allow a one time 30-day extension only with prior Central Government approval in exceptional circumstances. 2. Issue guidelines specifying essential components including executive summary, registration and enforcement statistics, complaint resolution data, financial statements, trend analysis, challenges faced, and forward looking policy recommendations to ensure comprehensive and standardised reporting. 3. Require the Authority to publish the annual report on its website within 15 days of submission and mandate the Central Government to table it

				before both Houses of Parliament within 30 days of receipt. Additionally, introduc quarterly progress reports on the Authority's website to provide timely updates between annual reports.