



LEGAL ADVICE
for regulation of loot box products in Australia
(FARMSKINS, ARPS LOOP LTD)

15 August, 2025



About us

SBSB Fintech Lawyers is an international legal company based in the United Kingdom with subsidiaries in Ukraine, Estonia and Czech Republic. SBSB Fintech Lawyers is one of the strongest law firms in the CIS and Europe, consulting on Gaming, FinTech, Crypto and Investments in these regions. For over 10 years, we have been providing full legal services for both startups and large businesses. Our services include consulting on obtaining gaming licenses, licenses for working on the forex market, cryptocurrency licenses, as well as resolving issues in legal regulation of gaming and blockchain. Our clients include B2C and B2B gaming operators and software suppliers, banks, financial institutions, hedge funds and forex brokers, crypto exchanges, and blockchain projects.

We have been asked to provide a legal opinion for the project FARMSKINS regarding the legality of offering their services without a gaming license on the territory of Australia.

Client's Business Description

FARMSKINS is a project which has a website <https://farmskins.com> (can be also interpreted as a "platform" in the text). The website is operated under ARPS LOOP LTD, which is incorporated in Cyprus under the company number HE477040, having its registered address at Nikou Georgia 6, Agioi Omologites, 1095, Nicosia, Cyprus.

General Legal Gambling Framework of Australia

In Australia, the regulation of gambling has traditionally fallen under the jurisdiction of the states and territories, rather than the Commonwealth. These state and territory governments oversee the regulation and provision of gambling services, as well as the collection of related revenue. However, due to the internet-based nature of certain gambling services, the Commonwealth has assumed responsibility for regulating interactive gambling services through the [Interactive Gambling Act 2001 \(IGA\)](#). As such, the IGA defines a gambling service as:

(e) a service for the conduct of a game, where:

1. the game is played for money or anything else of value; and



2. the game is a game of chance or of mixed chance and skill; and
3. a customer of the service gives or agrees to give consideration to play or enter the game.

FARMSKINS does not fall under this definition.

Firstly, FARMSKINS does not involve direct gameplay for money. Users do not participate in any competitive process or receive monetary rewards. Purchasing a case is a form of buying digital content with an element...



This is a shortened version of the document for informational purposes.

The full version of the document may be provided to partners or relevant authorities upon request.

To receive the full version of the document, please contact us at **executive@farmskins.com**.