CHALLENGES AND OPPORTUNITIES IN REGULATING DIGITAL GAMBLING

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Excessive gambling: Promoting and protecting health in a digitalised world
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DECLARATIONS

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Other roles:

- Board member on ABSG / Gambling Commission

- Member of Gambling Harms Evaluation Group / Finnish Ministry of Social Affairs and Health

- Consultant for the Council of Europe Pompidou Group

- Lancet Public Health Commission on Gambling

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- Finnish Research Council

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- OFDT France

- Finnish Alcohol Research Foundation

PRESENTATION OUTLINE

1. Realms of regulation

2. Effective regulation in online environments

3. Why aren't we implementing the most effective regulations?

4. Opportunities and ways forward

REALMS OF REGULATORY PRIORITY

- Gambling is related to a multitude of regulatory issues.

- Regulatory realms differ in terms of rules-based approach and self-regulatory approach.

Realms of gambling regulatory priority

- Harms & health
- Crime prevention
- Data security
- Integrity & transparency
- State revenue and taxation

Wardle et al., (2024). The Lancet Public Health Commission on Gambling.

RULES-BASED REGULATIONS ACROSS REALMS

🏃	Crime: Anti-money laundering (AML) and Counter-terrorist financing (CTF)	National and international regulations: MONEYVAL; Financial Action Task Force (FATF)
🖥️	Data security	National and international regulations: DSA (EU) Standards: ISO/IEC 27001 certification (e.g., UK)
🃏	Integrity and transparency	Technical standards (test houses conformity testing) National and international monitoring systems: EGMs, Sports betting monitoring systems
💵	Revenue and taxation	National tax laws.
👤	Health and harms	National practices vary. No international standards.

EFFECTIVE HARM PREVENTION / REDUCTION REGULATIONS

Primary (universal)

- Reducing availability
- Reducing accessibility
- Reducing visibility (including marketing)
- Limiting harmful products and characteristics

Secondary (selective)

- Binding mandatory limits
- Warnings
- Personalised feedback
- Duty of care interventions

Tertiary (indicated)

- Duty of care interventions
- Self-exclusions
- Effective forms of treatment: CBT, motivational interviewing

Based on umbrella review conducted in the Lancet Public Health Commission on Gambling

LIMITING AVAILABILITY AND ACCESSIBILITY

- Age limits

- Opening hours (including online)

- Blocking offshore gambling provision

  - Website and payment blocking

  - App availability, search engines

  - Limiting availability of wider ecosystem (e.g., affiliate websites)

  - Use of AI to identify mirror websites

Tämä kuva, tekijä Tuntematon tekijä, käyttöoikeus: CC BY-ND

Best Online Casinos May 2025

Sort by   **SCORE**   NEW   BONUS   CRYPTO   FREE SPINS   CASHBACK   NO DEPOSIT   BETTING   GAMES

🔍 Search a casino   🌐 *Toplist with 468 available casino(s) for you.*

1

Simsinos Casino
Score: Excellent 📊 5.00/5

💰 1st Deposit Bonus
100% up to $250   ⌄

💰 1st Deposit Spins
110 Spins   ⌄

🇨🇦 LICENSED IN CANADA

PLAY
18+ T&C's Apply

2

Kingmaker Casino
Score: Excellent 📊 4.97/5

💰 1st Deposit Bonus
100% up to $500   ⌄

💰 1st Deposit Spins
50 Spins   ⌄

🇵🇭 LICENSED IN PHILIPPINES

PLAY
18+ T&C's Apply

3

BluVegas Casino
Score: Excellent 📊 4.94/5

💰 1st Deposit Bonus
100% up to $500   ⌄

💰 1st Deposit Spins
100 Spins   ⌄

🇨🇦 LICENSED IN CANADA

PLAY
18+ T&C's Apply

4

Woopwin Casino
Score: Excellent 📊 4.91/5

💰 1st Deposit Bonus
100% up to $400   ⌄

💰 1st Deposit Spins
100 Spins   ⌄

🇨🇦 LICENSED IN CANADA

PLAY
18+ T&C's Apply

5

Spinsy Casino
Score: Excellent 📊 4.88/5

💰 1st Deposit Bonus
100% up to $500   ⌄

💰 1st Deposit Spins
200 Spins   ⌄

🇰🇲 LICENSED IN COMOROS

PLAY
18+ T&C's Apply

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BaltBet +live

Bet365 +live
   bet365
   bet365 (germany)
   bet365 (italy)
   bet365 (denmark)
   bet365 (greece)
   bet365 (spain)
   bet365 (netherlands)
   allsport365
   188-sb
   365sb
   365sport365
   878365
   365-808
   Game-365
   28365365

Bet9ja +live

Betano +live

betmgm(canada)
bwin(denmark)

Cashpoint +live
   cashpoint
   merkurbets
   betcenter
   cashpoint (denmark)

Codere +live
   codere (mexico)
   codere (spain)

Dafabet +live
   dafabet
   dafavip (for asia)
   dfkaya
   nextbet
   amperjai

Everygame

Sbobet +live
   sbobet
   pic5678
   u16888
   indukbola
   camquit
   ballhengheng
   c81688
   eaxybox

Sisal +live

Smarkets

Snai

SportyBet +live

Tempobet +live
   tempobet
   tianbaobo1
   tempobet (br)

REDUCING VISIBILITY (MARKETING)

- Untargeted marketing: recruiting

- Targeted marketing: particularly harmful

- Data-driven practices

- Increasingly opaque online marketing (content marketing)

- Alibi brand marketing (brand extensions)

REGULATING HARMFUL PRODUCTS

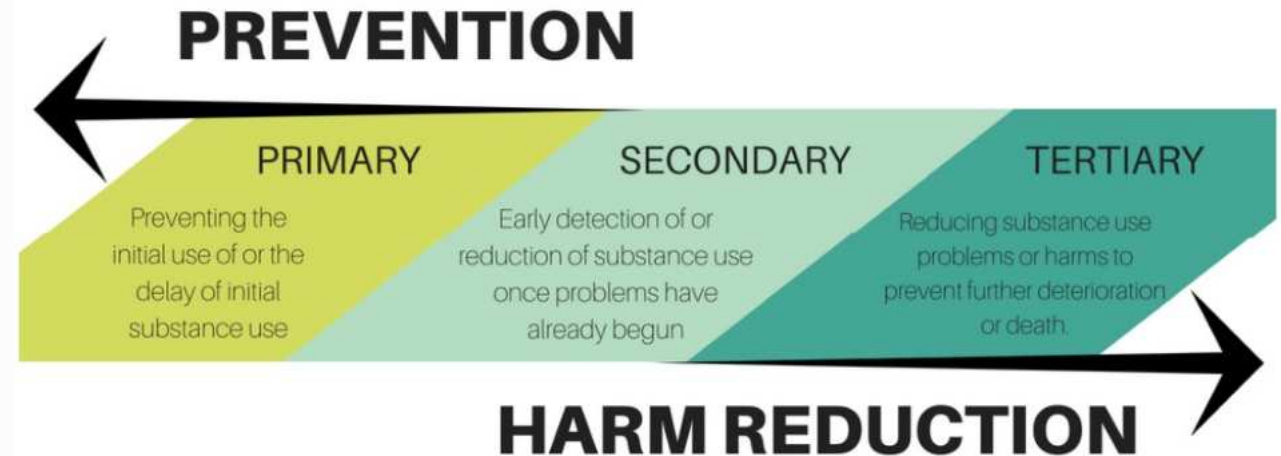| Gambling type	Population prevalence	PGSI 8+ prevalence
Lotteries	44.7 %	2.0 %
Online gambling (general)	7.8 %	8.6 %
Online casino	2.7 %	15.8 %
Land-based EGMs	11.6 %	8.1 %
Land-based casino	5.6 %	10.0 %
Sports betting	6.9 %	8.9 %

REGULATING HARMFUL DESIGN ELEMENTS

- Nudge: encouraging certain behaviour

- Sludge: Detrimental frictions

- Dark patterns: deceptive user-interface design

  - Asymmetric elements

  - Hidden elements

  - Deceptive elements

  - Restrictive elements

Newall, P. (2025). Sludge, dark patterns and dark nudges: A taxonomy of on-line gambling platforms' deceptive design features. *Addiction* ; Mathur et al. (2019). Dark patterns at scale: Findings from a crawl of 11K shopping websites. *Proceedings of the ACM on human-computer interaction*, *3*(CSCW), 1-32.

+ A RANGE OF SECONDARY AND TERTIARY INTERVENTIONS

- Binding, global and reasonable spending / loss limits

- Time-based limits and mandatory breaks

- (Unused) potential of AI-based tracking and interventions

- Low and science-based thresholds for interventions

- Low-threshold access to free treatment and help

PREVENTION

PRIMARY
Preventing the initial use of or the delay of initial substance use

SECONDARY
Early detection of or reduction of substance use once problems have already begun

TERTIARY
Reducing substance use problems or harms to prevent further deterioration or death.

HARM REDUCTION

Picture credit: https://www.recoveryanswers.org/

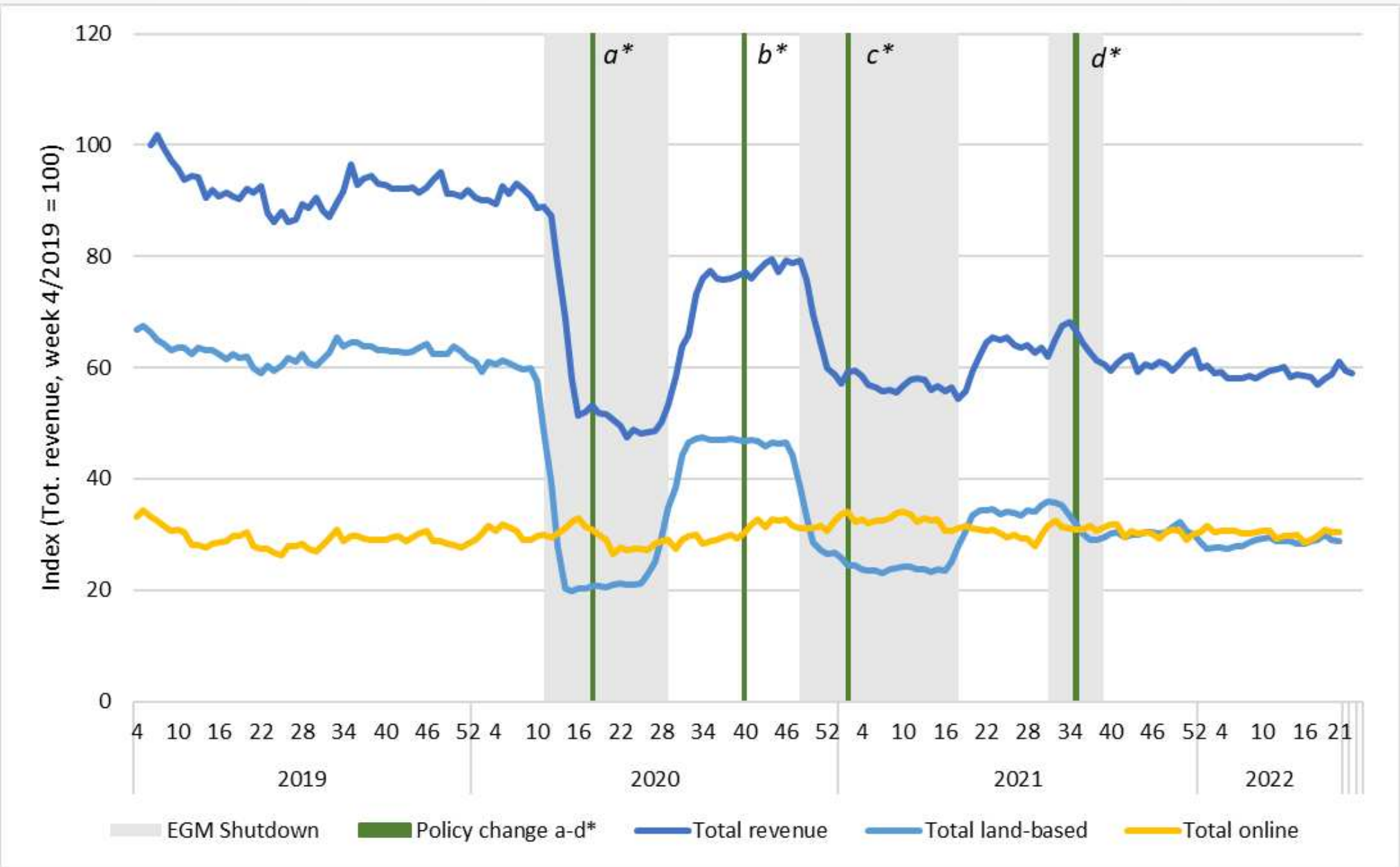# WHY AREN'T WE IMPLEMENTING THE MOST EFFECTIVE REGULATIONS?

1. COMPETING INTERESTS

- Harm prevention cannot be compatible with high revenue

*"The majority of the companies that have a license in Sweden, they don't have the manpower, and they don't have the real will. They're trying to survive in a very competitive market where there's another 80 online casinos available. **If they start limiting their MVPs [most valuable players], they're out of business. That's that simple.**"*
(Sweden)

Marionneau, V., Selin, J., Impinen, A., & Roukka, T. (2024). Availability restrictions and mandatory precommitment in land-based gambling: effects on online substitutes and total consumption in longitudinal sales data. *BMC Public Health*, *24*(1), 809.

2. REGULATORY CAPTURE

- Industry power over framings

- Industry power over policy: Lobbying for industry-friendly regulations

- Asymmetry of resources

*"Well, I mean, the challenges are that we end up or retain a landscape where **people are guided by industry discourse and lobbying**... to remain in a situation where **ineffective measures are promoted** and where you have the famous story about the emperor with the new clothes, and everybody's afraid to say that he's actually naked. To a large degree, that's what's happening in the Netherlands."* (NL)

3. THE OFFSHORE ARGUMENT

- Key lobbying strategy against effective regulations

- No independent evidence to support

- Distracts from implementing effective regulations within the system

The gambling providers always maintain that the illegal market is still 50% of the entire market, so we want to have more products. We want to have more incentives. We want to have less regulation. (Germany)

OPPORTUNITIES AND WAYS FORWARD

Independent regulation or harm

- Rules-based regulations rather than 'industry as part of solution'
- Prioritisation of population level measures
- Harm prevention costs less to societies

Evidence-based regulation

- Access to data –> better research evidence
- Learning from cross-comparative evidence and good practices
- Precautionary principle and burden of proof

Collaboration

- EU-level regulation, WHO
- Centralisation

THANK YOU!

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