

# POPULATION PROTECTION POLICIES ON GAMBLING

COUNTRY REPORT: CROATIA  
(JULY 2025)

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# INTRODUCTION

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# GENERAL FRAMEWORK

The gambling industry in Croatia is regulated by various laws and regulations. The most important and fundamental law (the so-called *lex specialis*) is the Law on Games of Chance (Official Gazette 87/09, 35/13, 158/13, 41/14, 143/14, 114/22, 72/25). Right at the beginning of this report, it should be emphasized that the current period in Croatia is very dynamic, especially with regard to the regulation of this industry. In 2023 and 2024, important amendments to the Law on Games of Chance were prepared, which related in particular to the socially responsible organization of gambling. The "new law" was published in the Official Gazette on April 23, 2025, and came into force on May 1, 2025. However, most of the provisions on socially responsible gambling and reduced exposure of Croatian citizens to gambling (reduced visibility of the industry, author's note) will not come into force until January 1, 2026.

The following chapters describe the current situation under the current regulations, as well as the expected new legal changes.

In addition to the Law on Games of Chance, as the main document, there are a number of legal acts (regulations, decisions and ordinances) that regulate this industry. These are the following acts (sub-legal regulations):

1. Ordinance on organizing remote betting games (OG 08/10, 63/10, 22/15)
2. Ordinance on organizing prize games (Official Gazette 08/10)
3. Ordinance on the criteria for determining beneficiaries and the method of distribution of part of the income from games of chance for the year 2010 (Official Gazette 11/10)
4. Ordinance on spatial and technical conditions for organizing games of chance in casinos, on machines and payment points of betting shops (Official Gazette 38/10, 130/10, 69/11, 15/12, 151/14, 36/20, 72/25)
5. Ordinance on technical correctness of machines and tables for games of chance (Official Gazette 38/10, 130/10, 49/13, 12/14)
6. Ordinance on obtaining approval (license) for casino work (Official Gazette 78/10)
7. Ordinance on organizing games of chance in casinos through interactive online gaming sales channels (Official Gazette 78/10)
8. Ordinance on organizing lottery games (OG 78/10, 69/11, 22/15, 45/16, 101/18, 72/25)
9. Decision on the number of organizers who can be granted the right to organize betting games on the territory of the Republic of Croatia (Official Gazette 96/10)
10. Decision on the number of organizers who can be given the right to organize games of chance in casinos in the Republic of Croatia (Official Gazette 96/10)
11. Ordinance on mandatory records for the calculation of fees from organizing games of chance (Official Gazette 08/15, 144/22, 122/23)

12. Decision on the number of organizers who can be granted the right to organize games of chance on machines in the territory of the Republic of Croatia (Official Gazette 92/16)

In addition, the Government of the Republic of Croatia issues a regulation each year on the criteria for determining the beneficiaries and the method for distributing a portion of the revenue from gambling for the year in question. For the year 2024, for example, it was decided that the revenue from gambling would be distributed to the following groups of beneficiaries: Promoting the development of sport = 38%, addiction treatment = 4%, social and humanitarian activities = 11%, meeting the needs of people with disabilities = 19%, technical culture = 3%, culture = 15%, non-institutional education and upbringing of children and young people = 2%, civil society development = 10%.

In a broader sense, the Law on Games of Chance is also related to the Law on Prevention of Money Laundering and Financing of Terrorism (Official Gazette 108/17, 39/19, 151/22), Criminal Law (Official Gazette 125/11, 144/12, 56/15, 61/15, 101/17, 118/18, 126/19, 84/21, 114/22, 114/23, 36/24), Misdemeanor Law (Official Gazette 107/07, 39/13, 157/13, 110/15, 70/17, 118/18, 114/22) and the like.

In the context of provisions concerning advertising, which will be explained in more detail in the following text, important legal acts in Croatia include:

- Electronic Media Act (Official Gazette 111/21, 114/22),
- Ordinance on the Protection of Minors in Electronic Media (Official Gazette 106/22).

As far as the public and political discourse on the regulation of games of chance (gambling industry) in the Republic of Croatia is concerned, it can be concluded that, as of 2023, a much more intensive and proactive approach is being taken compared to previous periods. Several parallel processes have contributed to this:

1. With the increase in the number of gambling addicts (or problem gamblers), public awareness or the sensitization of society to the risks associated with gambling and gambling disorder has increased significantly over the years, especially in the media through newspaper articles, television programs and interviews,
2. The basis of scientific knowledge has improved on the basis of various scientific studies in the field of gambling and gambling disorder, especially in our region,
3. On 15.2.2023, the Republic of Croatia adopted the National Action Strategy in the field of addiction for the period until 2030, in which measures to ensure socially responsible organization and playing of games of chance were implemented
4. The Ministry of Finance of the Republic of Croatia (as the regulator) formed a working group to develop proposals for amending the Law on Games of Chance, with the aim of placing greater emphasis on measures for the responsible organization of games of chance.

The draft bill with amendments to the Law on Games of Chance was published on 14.03.2024 and put out for public consultation, and the public had until 12.04.2024 to submit comments and suggestions. Then, on 12.07.2024, the proposed amendments were sent to the parliamentary procedure (to the Croatian Parliament) and the first reading in Parliament took place on 25.09.2024. After the adoption in the first reading (11.10.2024), the Government of the Republic of Croatia submitted the final bill to the Parliament on 10.03.2025, followed by a debate in the parliamentary committees. The second reading debate will begin on 03.04.2025, and the vote on the draft law was held on 11.04.2025. The new Act on Amendments to the Law on Games of Chance was published in the Official Gazette no. 72/25 on 23.04.2025 and entered into force on 01.05.2025.

In the Republic of Croatia, there is no separate, independent authority for the regulation and supervision of gambling, such as the “Gambling Commission” in some other countries. The regulation and supervision of gambling is carried out by the Ministry of Finance of the Republic of Croatia - Tax Administration, which issues licenses, carries out inspections and ensures compliance with legal regulations in this industry. The Ministry of Finance - Tax Administration is thus the central body for licensing, monitoring, and controlling all gambling operators, including online and land-based providers. Within the Tax Administration of the Ministry of Finance, there is a Sector for Games of Chance.

Of the other state institutions or public bodies, the Croatian Regulatory Agency for Network Activities (HAKOM), which is involved in blocking Internet access for unlicensed online operators (although it has no direct regulatory function for gambling), and the Croatian Institute of Public Health, which under the new legal framework will be responsible for keeping a register of self-excluded gamblers and implementing certain measures for the socially responsible organization of gambling, should be highlighted.

The Agency for Electronic Media (AEM) is responsible for the supervision of advertising and, in this sense, for the implementation of the provisions within its remit, which are exclusively the Electronic Media Act and the Ordinance on the Protection of Minors in Electronic Media.

## POLICIES FOR MEASUREMENT, RESEARCH, DATA TRANSPARENCY

In Croatia, there is no mechanism for systematic monitoring of the prevalence of problem gambling that would be defined by a national document. Research has been conducted on the initiative of scientists within the academic community (universities and scientific institutes). The new National Strategy for Action in the Field of Addiction for the Period Until 2030 (published on 15.2.2023; NN 18/23) within Priority 3.

"Contribute to increasing human and institutional capacities for the implementation of scientifically based and effective policy in the field of addiction and behavioral addictions" provides for two specific objectives that are linked to the needs of scientific research. These objectives are:

- Objective 1. Improving the system and coordination for the implementation of an integrated policy on addictions
- Objective 2. Effective international cooperation in the field of addiction

Objective 1 is strategically planned to be implemented through specific objectives that include the education system (1.1.), the national information system (1.2.), the quality system of programs, projects and interventions implemented in the field of addiction (1.3.), and the coordination system for the implementation of an integrated addiction policy (1.4.).

Measures for the implementation of specific objective 1.2. (National Information System) include promoting research and strengthening cooperation between the scientific community and political decision-makers, making research results understandable and accessible to management structures, as well as developing a culture of recording, monitoring and evaluating interventions, and exchanging experiences and good practices.

In conclusion, the new Strategy clearly states that it is focused on all types of addictions, including behavioral addictions such as gambling disorder, and emphasizes the need to monitor trends, conduct evaluations and research for the purpose of effective planning and implementation of preventive and treatment interventions. The Ministry of Health, in cooperation with the Croatian Institute of Public Health, is obliged to coordinate, monitor, analyze and evaluate the implementation of the strategy, and to include experts, the academic community and representatives of regulators and organizers of games of chance in this process.

As far as scientific papers and scientifically based information are concerned, these are publicly accessible, especially in online format. The group of scientists who systematically and continuously deal with scientific research (and thus with the publication of scientific publications) in the field of problem gambling in Croatia is relatively small. These are the following people, with the corresponding official links to scientific publications in the online scientific database CRORIS:

1. Prof.dr.sc. Neven Ricijaš: <https://www.croris.hr/osobe/profil/341>
2. Izv.prof.dr.sc. Dora Dodig Hundrić: <https://www.croris.hr/osobe/profil/29039>
3. Doc.dr.sc. Davor Bodor: <https://www.croris.hr/osobe/profil/1336>
4. Prof.dr.sc. Renata Glavak Tkalić: <https://www.croris.hr/osobe/profil/3308>
5. Prof.dr.sc. Zoran Zoričić: <https://www.croris.hr/osobe/profil/2138>.

In addition to the people mentioned above, there are also valuable research works by individual scientists and/or doctoral students who have dealt with topics related to gambling and gambling disorder in their research and publications.

There is no systematic national fund for gambling research in Croatia, so all research is funded through individually agreed collaborations and/or projects.

## GAMBLING MARKETING PROTECTION POLICIES

As already mentioned, the biggest legal changes have been made in the area of gambling advertising, but they have not yet come into force. As a reminder, the new Law on Games of Chance was enforced on 1.5.2025, but according to the transitional and final provisions, the advertising restrictions will come into force on 1.1.2026.

In order to clearly understand the current legal framework that has been in place in Croatia for many years in relation to the upcoming changes, the following table below presents the most important provisions related to gambling advertising.

AREA AND TYPE/METHOD OF ADVERTISING	<ul style="list-style-type: none"> <li>Before amendments to the Law on Games of Chance (1.5.2025); enforced 31.12.2025.</li> </ul>	After amendments to the Law on Games of Chance (1.5.2025); to be enforced 1.1.2026.
<b>Advertising on public areas (e.g. posters, billboards, electronic posters, etc.)</b>	It is not specified and is not limited, nor regulated in any particular way.	According to the new Article 67 c. (paragraph 1) gambling advertising on all publicly visible surfaces is prohibited.  The only exception (paragraph 3.) refers to advertising on the outside of premises where gambling is available, which does not invite people to gamble.
<b>Advertising in print media (newspapers, magazines, etc.)</b>	Very narrowly defined prohibition. Prohibited only in printed material intended for children and young people, and the prohibition also	The prohibition has been expanded, and according to Article 67a, gambling advertising is prohibited in all media, content and events intended for children and young people, and the

	<p>applies to the service provider and publisher (Article 67).</p>	<p>prohibition applies to gambling operators, media service providers, electronic publication providers, publishers and event organizers.</p> <p>Also, Article 67b (paragraph 2) prohibits gambling advertising in printed media, which also applies to operators, media service providers, electronic publication providers, advertising service providers and publishers.</p> <p>An exception to this provision, which completely prohibits advertising in printed media, is the advertising of low-risk lottery games, which include games in which the gambler learns the outcome of the game no more than once a day, and instant and express lottery games that use paper lottery tickets.</p>
<p><b>Advertising in electronic media (TV, radio, portals, Internet)</b></p>	<p>Very narrowly defined prohibition.</p> <p>Prohibited only in radio and television broadcasts intended for children and young people, and the prohibition also applies to the service provider and publisher (Article 67).</p>	<p>The prohibition is expanded in the provision, and according to Article 67.a it is prohibited to advertise gambling, content and at events intended for children and youth, and the prohibition applies to gambling operators, media service providers, providers of electronic publications, publishers and event organizers.</p> <p>Also, Article 67 b (paragraph 1) prohibits gambling advertising in</p>

		<p>all audiovisual and radio programs and the contents of electronic publications between 6:00 a.m. and 11 p.m., and the ban applies to operators, media service providers, providers of electronic publications, publishers and event organizers.</p> <p>An exception to this provision, which completely prohibits advertising between 6:00 a.m. and 11:00 p.m., is the advertising of low-risk lottery games, which include games where the gambler learns the outcome of the game up to once a day and instant and express lottery games that use paper tickets.</p> <p>In addition to the above, advertising is permitted on the websites of gambling operators. This is also an exception.</p>
<ul style="list-style-type: none"> <li>• <b>External visibility of Land based Gambling Venues</b></li> </ul>	<p>It is not regulated.</p>	<p>The new Article 67 (paragraph 6) stipulates that the Government of the Republic of Croatia shall, by decree, determine the external design and advertising on the external parts of Land based Gambling Venues, but according to Article 20 of the Transitional and Final Provisions from the Official Gazette 72/25, the deadline for this provision is 90 days from the date of entry into force of this Act.</p>

		<p>As this regulation is not yet available at the time of writing, it is unknown how the external visibility of the premises will be regulated exactly.</p> <p>The only known provision is the new Article 67. c (paragraph 4), which states that the external appearance of land-based Gambling Venues must be such that it prevents insight into gambling tables, slot machines, self-service betting terminals and the offer and results of betting games.</p>
<p><b>Participation of famous people in advertisements</b></p>	<p>It is not regulated by the Law on Games of Chance.</p> <p>It is only mentioned in the Ordinance on the Protection of Minors in Electronic Media (explained below), however this provision applies only and exclusively to electronic media, and not to posters and printed media.</p> <p>Therefore, according to the (still) current legal framework, celebrities are allowed to appear in</p>	<p>New Article 67 d. (paragraph 2) stipulates that the appearance of famous persons and persons of media influence is not allowed in gambling advertising, audiovisual and radio programs, contents of electronic publications, printed media and on publicly visible surfaces.</p> <p>This significantly emphasizes this prohibition, and it is important that it is included in the law and that it is not only part of the ordinance (as it has been so far), as a by-law.</p>

	advertisements on posters, in public areas and in printed media	
<b>"Influencer" posts on social networks</b>	It is not regulated, nor is it specified anywhere in legal acts.	The new Article 67. d. (paragraph 3) prohibits content creators on social networks from promoting gambling, advertising gambling, and live streaming gambling.
<b>Advertising bonuses and promotions</b>	It is not regulated, nor is it specified in legal acts anywhere.	The new Article 67. b (paragraph 8) imposes a ban on advertising that invites people to gamble by offering bonuses, free spins and similar benefits. According to the new Law, this is only permitted on the websites of operators.
<b>Sponsored advertising</b>	It is not regulated, nor is it specified in legal acts anywhere.	The new Article 67. d. (paragraph 1) stipulates that sponsored advertising by gambling operators may contain the company name, a display of the logo and recognizable service marks of the operator, but may not contain other features that invite or refer to gambling.

Specific content on how advertising in electronic media (television, radio, Internet) may look is prescribed to a lesser extent (very briefly and in principle) by the Electronic Media Act (Official Gazette 111/21, 114/22), while more detailed provisions on the appearance and content of advertising are laid down in Articles 12 and 13 of the corresponding Ordinance on the Protection of Minors in Electronic Media (Official Gazette 106/22).

The Electronic Media Act stipulates that audiovisual communication relating to games of chance may not be broadcast in programs intended for children (Article 21, paragraph 10) and that audiovisual commercial communication relating to games of chance (gambling) must contain a warning about the risk of developing gambling disorder (Article 21, paragraph 11). Article 24 (paragraph 1) stipulates that audiovisual media services and radio programs, as well as the

content of electronic publications, may not in any way incite, promote or glorify violence and crime or encourage citizens, especially children and adolescents, to consume tobacco products, alcohol, drugs or other forms of addiction. As we can see, gambling disorder is not specified, but it is interpreted by the part of the provision that speaks of "...all other forms of addiction". Paragraph 2 of the same article states that audiovisual media services and radio programs and the content of electronic publications which may seriously impair the physical, mental or moral development of minors, in particular those involving gratuitous violence, are not permitted. In a broader context, this may also refer to the wider harms associated with a gambling and potentially anti-social lifestyle.

As regards specific content, Article 12 (paragraph 3) of the Ordinance on the Protection of Minors in Electronic Media stipulates that the audiovisual commercial communications related to gambling may not:

- claim that gambling is free from the risk of financial loss,
- use popular figures who are role models for young people and figures of media influence,
- use fictional or animated characters from popular culture,
- contain claims that gambling marks the transition from adolescence to adulthood,
- provide false or unrealistic information about the probability of winning, suggest that skill can influence the outcome of the game,
- suggest that gambling is an important part of every individual's everyday life,
- suggest that gambling can be a solution to personal, professional or educational problems,
- suggest that gambling can lead to sexual success or contribute to a person's attractiveness,
- depict, justify or encourage criminal or antisocial behavior,
- target or be specifically directed at minors in such a way that they are particularly attractive to children and young people, reflecting or connecting with youth culture.

Article 13 of the same Ordinance stipulates that the advertisements must also either display a visual symbol of the category "18" for the entire duration of the advertisement, or provide an audible warning stating "The following content is not suitable for minors under the age of 18".

As for sponsorships, as can be seen from the table above, they are not prohibited in Croatia, but from 1.1.2026 the appearance and content of sponsorship advertising will be limited. The same applies to sporting events. Accordingly, in the following period, after 1.1.2026, we can expect that sponsorship advertisements by gambling operators will be visible at sporting events, both in the form of posters (billboards) and on athletes' jerseys and sports equipment.

# PROTECTION POLICIES FOR GAMING MACHINES AND GAMING HALLS

To understand this area, as well as the next chapter related to online gambling, it is necessary to understand the basic legal framework of the gaming industry in Croatia. According to the Law on Games of Chance (Article 5, paragraph 1), games of chance are divided into four groups:

1. Lottery games
2. Casino games
3. Betting games
4. Games on automatic machines (EGMs).

Within each group, there are different individual types of games. For example, lottery games include lottery tickets, lotto games, bingo, but also some quick lottery games. Casino games include games such as roulette, table games with dice or cards, and the like. Betting games are most widespread in the context of sports betting, but there is also an offer of betting on various other events (for example, the Eurosong competition, the Oscars, political elections, and the like), as well as betting on lottery numbers. EGMs include 'slot-machines' with a random number generator or some other random events, generated in advance by software. They can also simulate races or some other casino games (roulette, card games etc.).

Hrvatska Lutrija, d.o.o., as a state-owned company, has a monopoly over lottery games, i.e. the state has granted the exclusive right to operate lottery games only to its state-owned company. Other private gambling operators can obtain the right to operate (the so-called license for operating) based on a verified proposal from the Ministry of Finance of the Republic of Croatia (after analyzing all legal prerequisites), and based on a decision of the Government of the Republic of Croatia. Decisions of the Government of the Republic of Croatia define the maximum number of rights that can be granted, which actually means the maximum number of companies (private operators) that can be licensed to operate games of chance.

This text uses the latest official information from the presentation at the session of the Government of the Republic of Croatia in March 2025, when amendments to the Law on Games of Chance were presented<sup>1</sup>.

The right to provide games in casinos can be granted to a maximum of 20 gambling operators, and a total of 18 operating rights have been granted (95% market utilization). The right to provide and operate betting games can also be granted to 20 operators, and 6 have been granted (35%

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<sup>1</sup> [https://vlada.gov.hr/UserDocImages/2016/Sjednice/2025/Ozujak/70\\_sjednica\\_VRH/70%20-%203%20Prezentacija.pdf](https://vlada.gov.hr/UserDocImages/2016/Sjednice/2025/Ozujak/70_sjednica_VRH/70%20-%203%20Prezentacija.pdf)

of the market), while the right to provide gambling on slot machines can be granted to a maximum of 55 gambling operators, and 40 have been granted (75% market utilization).

Although the Croatian government has regulated the maximum number of licenses for the right to operate games of chance, it has not regulated and limited the maximum number of gambling venues. The maximum number of gaming venues is also not regulated in relation to the size of a place and/or the local community. This has enabled the market in relation to land-based gambling venues to expand according to the principles of supply and demand. It is also important to emphasize that there is no maximum possible number of Games on automatic machines per person (the so-called number of EGMs per capita).

As a result, today gambling is available at a total of 6,301 venues, and specifically, the following distribution is involved:

- 23 casinos
- 388 EGM venues
- 1,288 betting shops
- 3,683 self-service betting terminals in catering establishments (the so-called betting machines)
- 919 EGMs at betting shops.

The Ministry of Finance, Tax Administration, of the Republic of Croatia does not report on the number of EGMs per capita, but the latest available information can be found on this website (Slot Machines by Country<sup>2</sup>) and in a report from 2019<sup>3</sup>, which states that Croatia had 9,466 EGMs in 2019, which is 447 people per machine (the estimated population of the Republic of Croatia at that time was 4,227,746). It should be noted that the population estimate from the 2011 census was probably used here, while the 2021 census of the Republic of Croatia states that there has been a significant decrease (by 413,056 people; -9.64%), i.e. that Croatia now (officially in 2021) has 3,871,833 people.

In relation to land-based gambling venues, Croatia only legally regulates the distances between the venues of the gambling operator (of certain types of gambling games) and some facilities. Until recently, these distances were regulated by the Ordinance on spatial and technical conditions for operating games of chance in casinos, on slot machines and betting points (Official Gazette 38/10, 130/10, 69/11, 15/12, 151/14, 36/20). With the amendments to this Ordinance in Official Gazette 72/25, the provisions relating to the distance were removed, but this is due to the alignment with the new amendments to the Law on Games of Chance from 2025, which states that distances will be regulated by a special Regulation (which has not yet been introduced, author's note).

Accordingly, this text will present the current rules according to the provisions of the above-mentioned Ordinance until 2025, which actually reflects the current situation and distances we are witnessing in the Croatian context.

In order to understand the extremely wide availability of gambling in Croatia, it is necessary to understand the amendments to the aforementioned Ordinance over the past 15 years, which is why the table below lists the years when the Ordinance was enforced, along with provisions for betting venues, casinos and EGMs, and a comment on the consequences of such a solution.

<p><b>The Ordinance on Spatial and Technical Conditions for Organizing Games of Chance in Casinos, EGMs and Betting Sites</b></p> <p><b>*shown by year, with a comment on the aforementioned provision</b></p>	<p><b>Betting venues (includes self-service betting terminals in catering establishments)</b></p>	<p><b>Casinos and EGMs (includes EGMs in betting shops)</b></p>
<p><b>2010</b></p>	<ul style="list-style-type: none"> <li>▪ Betting venues /shops must be located at least 200 m away from educational institutions (primary and secondary schools)</li> </ul>	<ul style="list-style-type: none"> <li>▪ casinos and EGM venues must be at least 500 m away from other casinos, EGM venues, educational and religious facilities</li> </ul>
<p><b>comment</b></p>	<p>The regulation does not include a wide range of educational institutions (for example, kindergartens, student dormitories), nor the mutual distance between betting venues</p>	<p>Educational and religious facilities are not specified in the Ordinance, which has led to diverse interpretations and difficulties/inconsistencies in application.</p>
<p><b>2012</b></p>	<ul style="list-style-type: none"> <li>▪ Betting venues must be located at least 200 m away from regular elementary (fifth to eighth grade) and secondary schools</li> </ul>	<ul style="list-style-type: none"> <li>▪ Casinos and EGM venues must be at least 500 m away from other casinos and slot venues</li> </ul>
<p><b>comment</b></p>	<p>The provision is significantly liberalized and further</p>	<p>The provision is significantly liberalized in such a way that</p>

	excludes smaller primary school areas that only have students from the first to fourth grades.	educational and religious facilities are completely excluded. This results in the opening of slot machine clubs near schools, even in buildings right next to schools.
<b>2020</b>	<ul style="list-style-type: none"> <li>▪ Betting venues must be located at least 200 m away from educational institutions and religious buildings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Casinos and EGM venues must be located at least 500 m away from other casinos, slot machine venues, educational and religious facilities.</li> </ul>
<b>Comments and consequences of the application</b>	<p>The Ordinance specifies educational and religious facilities in more detail, which allows for a more correct application of the provision. A stricter principle, i.e. more restrictions, is being restored.</p> <p>The legislator has consistently ignored other institutions in which there is no doubt that there are persons vulnerable to the development of gambling-related problems, and/or institutions that (by analogy with religious institutions) should be taken care of for 'moral' (or some other value-based) reasons. These include, for example, social welfare institutions (especially institutions for children without adequate parental care and institutions for children and young people with behavioral problems - educational institutions), as well as psychiatric clinics where addicts are treated, therapeutic communities for addicts, and the like.</p> <p>There are no restrictions on lottery games.</p> <p>Land-based venues can also be opened in premises of apartment buildings if more than 50% of the co-ownership share of the individual building agrees to this. This has resulted</p>	

	<p>in the opening of numerous betting venues and slot machine venues in apartment buildings.</p> <p>From 2012 to 2020, it was allowed to open slot machine venues and casinos near educational and religious facilities, many of them are still active, regardless of the amendments to the Ordinance from 2020, due to the impossibility of retroactive application of the legal act.</p> <p>The aforementioned places will remain open as long as they have a valid license, according to the then applicable legal framework. Only after the expiration of the license is it expected that there will no longer be venues of these gambling operators near educational and religious facilities.</p> <p>I repeat, the new amendments to the Law on Games of Chance provide for the adoption of a Regulation that will regulate distances (Article 13, paragraph 6 of the Law on Games of Chance 72/2025).</p>
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As is evident from the previously presented statistics, slot machines (EGMs) can also be placed at betting venues, and self-service betting terminals (so-called betting machines) can be placed in catering establishments.

According to the new amendments to the Law on Games of Chance (Article 46, paragraph 2; 72/2025), self-service terminals (betting machines) are no longer allowed in catering establishments. They have been removed as an option, and now this paragraph reads "Payments for betting games are accepted at betting venues and via self-service terminals at betting venues, in the premises of casinos and slot machine venues". This provision comes into force on 01.01.2026. This means that betting machines will no longer be able to be located in catering establishments (3,683 of them), and there will be no "merger" of the catering industry and the betting industry in the same way. They will only be available in places where gambling is provided, but not lottery games.

Unlike some other European countries (e.g. Finland), EGMs cannot be available in stores or other venues. Only kiosks have the option of offering lottery games via electronic terminals,

since Hrvatska Lutrija, d.o.o., has the right to provide a sales network for lottery games through partners. In Croatia, this mostly concerns kiosks, gas stations and post offices.

Minors have been prohibited from gambling since 2010 (all types of gambling; in the past 16 years of age was the age limit for lottery games). Both at land-based gambling venues and for registration for online gambling with licensed gambling operators in the Republic of Croatia.

However, as far as player identification is concerned, new amendments to the Law on Games of Chance have resulted in stricter regulations, which have also been strongly advocated for by mental health experts in Croatia. It is important to note that these provisions were enforced immediately, from 1.5.2025.

<b>PLAYER IDENTIFICATION by gambling venue</b>	<b>Before amendments to the Law on Games of Chance (1.5.2025); until 30.04.2025.</b>	<b>After amendments to the Law on games of chance (1.5.2025); enforced 1.5.2025.</b>
<b>Lottery venues (access to lottery games)</b>	identification only in case of doubt whether the player is of legal age or not	identification only in case of doubt as to whether the player is of legal age or not  Article 13, paragraph 2 of the Act: "In case of doubt as to whether the player is of legal age, the participant in the lottery game is obliged to prove his legal age with an identification document."
<b>Betting venues (access to betting games)</b>	identification only in case of doubt whether the player is of legal age or not	Identification is required for access to betting games (as well as slot machine games in betting shops)  Article 49, paragraph 1 of the Act: "Persons under the age of 18 are prohibited from visiting betting shops and participating in gambling."
<b>EGM venues (access to slot machine games in slot clubs)</b>	there was no mandatory identification when entering the venues, but only in case of doubt as to whether the player is of legal	mandatory identification with an ID card at the entrance

	age or not, the player could be identified (most often at the cash register when withdrawing winnings from gambling)	Article. 60, paragraph 1 of the Act: "(1) Visiting and participating in gambling operated in slot machine venues is permitted only to persons who have identified themselves."
<b>Casino (access to casino games)</b>	mandatory identification with an ID card at the entrance	mandatory identification with an ID card at the entrance  Article 43, paragraph 1 of the Act: "Visiting a casino and participating in gambling is permitted only to adults who are required to prove their identity with an identification document."

From the presented comparative overview of the legal regulations regarding player identification, it is evident that until 01.05.2025. much more flexible rules were applied. Identification at the entrance to the premises was only necessary to enter the casino. Now, in addition to the casino, it is also necessary to enter the EGM venues, while stricter forms have been set for betting venues. This certainly aims to contribute to the ban on access to the game for two groups: (1) minors and (2) self-excluded players.

As for the self-exclusion procedure for players, it has existed as an option for some time, but the current amendments to the Law on Games of Chance (72/2025) have made significant changes in this area.

Until these changes in 2025, which will ensure full functionality by the end of 2025, players who wanted to exclude themselves from gambling could do so with each individual gambling operator. The self-exclusion procedure was also not developed at the national level, but was left to each gambling operator individually, with the necessary approval of the Ministry of Finance for this procedure. In practical terms, this meant that a gambler could exclude themselves from gambling with one operator (be blocked by them), and thus satisfy the form towards others who are exerting pressure to abstain from gambling (for example, family members, psychiatrists, etc.), while in fact they had open accounts with other operators and the possibility of gambling with other operators.

With such a solution, for many years the system and procedure of self-exclusion was only a form, without practical significance that would really, at the national level, ensure the procedure of excluding a gambler and blocking his access to gambling.

Now, with the amendments to the Law on Games of Chance (72/2025), the prerequisites for (self)exclusion at the national level have been created, by introducing a register of excluded gamblers. This is a novelty that still needs to be fully operationally organized, in full functionality, but this process is expected to be completed by the end of 2025. The text below is reproduced in full from Article 67. e. of the Law on Games of Chance (72/25), which also shows that other persons will also be able, without the consent of the gambler, to submit a request for exclusion from gambling.

### **Procedure for self-exclusion of gamblers and the register of excluded gamblers**

#### **Article 67.e (OG 72/25)**

- (1) A gambler participating in gambling referred to in Article 5, paragraph 1, items 2, 3 and 4 of this Act and remote lottery games may request exclusion from gambling by submitting a request via the exclusion form to the operator in writing or electronically, as well as electronically directly to the register of excluded gamblers.
- (2) A request via the exclusion form, with the consent of the gambler referred to in paragraph 1 of this Article, may also be submitted directly to the register by an authorized employee of the Croatian Institute for Social Work, family protection institutions and health institutions dealing with mental health protection and addiction treatment.
- (3) The request referred to in paragraph 2 of this Article, without the consent of the gambler, may also be submitted by the body competent for the implementation of protective measures and special obligations imposed in court proceedings.
- (4) The operator, the authorized employee of the institution referred to in paragraph 2 of this Article and the body referred to in paragraph 3 of this Article shall be obliged to submit data on excluded gamblers to the register immediately upon receipt of the request for exclusion, and no later than 24 hours from receipt.
- (5) The operator shall ensure that the gambler referred to in paragraphs 1, 2 and 3 of this Article does not participate in gambling.
- (6) The Croatian Institute of Public Health shall establish and maintain a register of excluded gamblers containing data on excluded gamblers.
- (7) The Minister of Finance shall prescribe in regulations the content of the exclusion form and the method of excluding gamblers.
- (8) The Minister of Health, with the prior consent of the Minister of Finance, shall prescribe in regulations the content and method of keeping the register of excluded gamblers and the data that the register must contain.

It is important to emphasize that the (self-)exclusion procedure for all Croatian legal and licensed operators applies equally to both land-based outlets and online gambling.

## REMOTE GAMBLING RESTRICTIONS (ONLINE)

In the Republic of Croatia, companies that have the right to operate land-based gambling (licensed operators are based on a decision of the Government of the Republic of Croatia) may be granted the right to operate online games, or online gambling, through interactive sales channels, according to specially defined rules.

For the purposes of this text, it is important to summarily state that, (1) if the operator does not have the right to operate land-based gambling, (2) does not meet certain conditions in relation to the number of branches, and (3) does not pay an additional annual fee for online operating, it cannot obtain a license for online operating.

The registration procedure for online games of chance (online gambling) requires clear identification of the gambler, and during the registration procedure, the data is checked by the Tax Administration of the Ministry of Finance based on the personal identification number of citizens (OIB number), which ensures the gambler's age. Of course, there is information about the mechanisms by which minors have abused someone else's identity for registration and online gambling. However, formally and legally, minors are prohibited from participating in all types of gambling, in all modalities (both on land and online).

Children and minors should not be targeted by advertising, and the Agency for Electronic Media should first of all take care of this based on the aforementioned Law on Electronic Media (Official Gazette 111/21, 114/22) and the Ordinance on the Protection of Minors in Electronic Media (Official Gazette 106/22). It should be said here that in Croatia, there are identified ads that use a visual, logo, and/or narrative that is very attractive to children, but they were not assessed as violators of these legal acts. It is about the assessment of the profession's psychosocial profile, and the different interpretations of competent institutions in relation to mental health experts. Therefore, it is possible to conclude that it is difficult to determine whether gambling advertisements are aimed at children and minors, since they also depend on the perspective, the professional frame of reference of the evaluator.

However, there are certainly ads that are very "fringe", that is, that undeniably flirt with addressing the younger population and raising interest in gambling among children and young people.

As for the availability of unlicensed gambling operators, they pose a significant problem for the Croatian online gambling market. The Tax Administration of the Ministry of Finance publishes a

list of blocked operators on its website under the category "Illegal Conduct of Economic Activities via the Internet - Organizing Games of Chance in the Republic of Croatia<sup>2</sup>".

In addition to the financial aspect, the availability and accessibility of unlicensed gambling operators also creates a problem from a public health perspective, as it provides easy and simple access to gambling for both children/minors and (self-)excluded players.

Croatia is also addressing the issue of illegal operators through measures to block access to the websites of unlicensed operators, which was implemented by the Act on Amendments to the General Tax Act (OG 106/18) in 2019, which regulated the prevention of conducting illegal economic activities via the internet. In order to increase the effectiveness of the aforementioned measure to prevent citizens from participating in gambling with unlicensed gambling operators via the internet, the Act on Amendments to the General Tax Act (OG 152/24), which entered into force on 1 January 2025, regulated an additional expansion of prevention measures by introducing a block on payments into illegal gambling operators, which will be implemented by payment service providers.

However, it is also necessary to emphasize that in practice we encounter various available Internet sites that promote and enable gambling with illegal operators, and this poses a significant challenge.

As for the procedure for (self)exclusion from online gambling, the procedure and rules are the same for land-based and online gambling modalities, since these are licensed organizers.

## TREATMENT AND SUPPORT FOR PROBLEMATIC GAMBLING BEHAVIOR

In order to better understand treatment and support for people with gambling disorder (and/or people with gambling problems in general) in the Republic of Croatia, it is useful to differentiate treatment options according to several criteria:

### 1. Level of treatment specialization:

- 1.1. The institution has a treatment (entire protocol) specialized specifically for gambling disorder,
- 1.2. The institution deals with addictions in general (without specialization in gambling disorder) and also accepts clients with gambling disorder problems,

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<sup>2</sup> <https://porezna-uprava.gov.hr/hr/nedozvoljeno-obavljanje-gospodarske-aktivnosti-putem-interneta/3984>

1.3. The institution deals with mental health in general, so it is possible to receive services related to addictions as well.

2. Age group:

2.1. The institution accepts only adults (adults, older than 18 years of age),

2.2. The institution also accepts minors (younger than 18 years of age).

3. Financial aspect:

3.1. Services are completely free for users (financed from the state budget within the health and/or social welfare system),

3.2. Services involve payment of a participation fee (a small portion by the user),

3.3. Services are paid by the user.

As specialized institutions (or departments within institutions) that deal specifically with gambling disorder, the following places can be highlighted:

For adults (over 18 years of age) within the health system:

1. Day Hospital/ Clinic for Gambling Disorder, Sv. Ivan Psychiatric Clinic, Zagreb
2. Day Hospital/Clinic for Gambling Disorder Treatment, University Psychiatric Hospital Vrapče, Zagreb
3. Gambling Disorder Treatment Program, County Hospital for Psychiatry and Rehabilitation Insula, Rab.

The three mentioned places provide specialized protocols within the health system, which is completely free of charge for all clients (patients).


For adults (over 18 years of age) within the non-governmental sector (NGO):

- In Croatia, there are Clubs for Treated Gambling Addicts (KLOK), which provide support and a rehabilitation program.

According to available information, there are a total of 6 such Clubs, and participation involves paying a membership fee, or financial participation in the costs of treatment.

For minors (under 18 years of age):

- Within the Teaching and Clinical Centre of the University of Zagreb, Faculty of Education and Rehabilitation Sciences, there is a Cabinet for Risky Online Behavior and Behavioral Addictions (Zagreb).



Within this Cabinet, a specialized team for behavioral addictions offers counselling and treatment to minors who have developed gambling-related problems. The cabinet's services require a participation fee from the user.

(2) Institutions that generally deal with addictions (without specialization in gambling), but also accept clients (users) who have problems with gambling disorder

- County public health institutes (20 in total in Croatia)
- Psychiatric departments at hospitals
- Therapeutic communities (9 in total in Croatia)

These are places that have their own organizational units (or teams of experts) specialized in addictions in general.

As part of providing treatment interventions for addicts, there is also the possibility of treating gambling disorder. Although they do not have a specific specialization, in recent years.

These are mostly institutions that accept adults (18+), with the exception of one therapeutic community that accepts users from the age of 16.

The treatment is completely free of charge, i.e. the costs are covered by the health system (public health institute, psychiatric departments in hospitals) or the social welfare system (therapeutic communities).

(3) Institutions that generally deal with mental health, but it is also possible to obtain services related to addiction or gambling disorder.

In Croatia, there are organizations that provide psychosocial assistance and support on a general level to people with mental health problems and/or other problems of individual, family, educational, and wider social functioning.

The catalogue of institutions listed by the Croatian Institute of Public Health<sup>3</sup>, which can also provide assistance with gambling-related problems, includes the following institutions:

- Family centers (each county has its own, there are 20 in total in Croatia)
- Red Cross
- Counselling centers (most often these are city institutions)

Most of these institutions provide free counselling.

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<sup>3</sup> <https://ovisnosti.hzjz.hr/korisni-kontakti/?ovisnost=kocka>

In addition to the above, there are also private psychotherapists and/or clinics/offices that provide psychotherapy services, also enabling therapeutic work in the area of gambling-related problems, but to the knowledge of the author of this text, no one specializes in this area.

In conclusion, in Croatia, there is a possibility of receiving free psychosocial assistance and/or treatment for gambling disorder, but especially outside the City of Zagreb (the capital of Croatia), there is a lack of specialized institutions and/or specialized teams of experts with treatment protocols specific to this area. A major shortcoming is also the lack of availability of interventions in Croatia for young people who have gambling problems.

# RECOMMENDATIONS FOR IMPROVING POLICIES TO PROTECT THE POPULATION AGAINST HARMFUL GAMBLING BEHAVIORS

Based on the above, **the following recommendations for Croatia** can be derived, which aim to improve the regulation of the gambling industry, strengthen socially responsible gambling and ensure appropriate interventions:

1. There is a need to **more strictly regulate, monitor, and penalize gambling industry advertising that is attractive to children and young people**. Current practice in relation to the Agency for Electronic Media has shown an overly lax approach to interpreting the visual identity of individual advertisements.
2. **Specialized day clinics for the treatment of gambling disorder should be available at least in the four main regions of Croatia**, i.e. in the four largest Croatian cities (Zagreb, Split, Rijeka, and Osijek). There are currently two-day clinics only in the capital Zagreb.
3. In view of the increasing shift in gambling towards online gambling, the state must make **additional efforts to block access to gambling by unlicensed (illegal) online gambling operators** more intensively.

4. In view of the increasingly close links between the gambling industry and the sports industry, it is necessary to **strictly regulate (or completely ban) the sponsorship of sports clubs and athletes by the gambling industry**. Sports betting thus becomes a normative behavior in the context of following sports, but also playing sports, which poses a particular risk to children, adolescents and young adults.
  
5. **Young people with gambling problems, especially if they are minors**, are often an insufficiently detected group, as gambling is a hidden addiction. As a result, there are no **specific interventions for this age group in Croatia**, but there is also insufficient diagnosis and triage of gambling-related problems in minors.

