

# GENERAL REPORT ON GAMBLING PROTECTION POLICIES (Aug. 2025)

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# 1. INTRODUCTION

This general report was developed within the framework of the 'Play Your Cards Right' project (2023-1-RO01-KA220-VET-000160621), co-funded by the Erasmus+ Programme of the European Union and implemented by a consortium led by Asociatia Educatie Pentru Viata Reala (Romania), in partnership with Produções Fixe Unipessoal Lda (Portugal), Asociatia Aliat pentru Sanatate Mintala (Romania), Ayuntamiento de Ceutí (Spain) and Klinika za psihijatriju Vrapce (Croatia).

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Historically, taxation, licensing and fraud prevention have been the most important aspects considered by regulators when creating the institutional arrangements underpinning gambling activity. However, the recent regulation focus has moved towards mitigating the risks and negative aspects of gambling and understanding the variety of gambling harms and addictions.

The gambling protection regulations have not always been as widespread or as politically significant as they are today. Twenty years ago, when most of the states in Europe started liberalizing gambling, very few safeguards were put in place since the gambling harms were not well understood. As gambling became widespread and its impact became more visible, the regulations for reducing harm gradually began to take shape.

The European Union attempted to create a unified gambling protection regulation at the beginning of the 2010s, culminating with Recommendation 478 from 2014 on principles for the protection of consumers and players of online gambling services and for the prevention of minors from gambling online. But after 2018, the Expert Group on Online Gambling which was working under The Directorate General for Internal Market, Industry, Entrepreneurship and SMEs was disbanded and DG GROW has decided against re-forming it despite calls from national regulators to do so. This also reflects the larger change of perspective on gambling from seeing it as a normal service industry that should be part of the Single Market for goods and services to conceptualizing it as an industry creating important public health problems that should be tackled together with other public health issues.

In such a context of rapid increase in the harm caused by the modern industry of gambling and the necessity to improve population protection, in this General Research Report on Gambling

Policies, we first created a **descriptive methodology to map the different gambling protection policies in all four countries** part of the 'Play Your Cards Right' project, that has 3 main roles:

1. create a policy map framework that captures the broad range of policy options from which various countries can choose in 2024,
2. group these policies in meaningful ways to increase their understanding, and
3. evaluate through this lens the gambling protection system of each of the four countries taking part in this project.

The policies map is a descriptive approach to enable policymakers and stakeholders to understand the entire gambling protection landscape from a larger European perspective and to potentially identify gambling harm protection gaps.

The complementary effort to this broad policy map is to identify a set of good practices for policies focused on gambling harm reduction. Our approach is centered on analyzing the literature in this domain and combining these policy evaluation results with the specific experiences of the four countries taking part in this project. This effort is important as the literature and regulatory experiences in the four countries taking part in this project show small effects from most of the protection policies in contemporary use by the European countries.

**The main methodological instrument** that we proposed in this sense is a **simplified index of effective policies in gambling harm reduction**. Thus, we created in this research activity an innovative toolkit called **Gambling Protection Index (GPI)**. This best policies framework evaluates how performant a country is when it comes to meaningfully protecting its citizens from the harmful effects of gambling and on which domains it should focus its efforts in the near future.

Therefore, the specific results of this project are:

1. Two methodological instruments in this document, one meant to map comprehensively the gambling protection policies (the policy mapping framework), and the second one meant to evaluate compliance with a set of good practices for public policies on preventing gambling harms (the GPI).
2. Comparative analysis of the public policies of the 4 countries where this project takes place.
3. Recommendations on how to improve public policies in each country to better protect their citizens.
4. Four brief country reports based on presenting their policy frameworks through the lens of the comprehensive gambling protection policy map framework and evaluating their performance through the Gambling Protection Index. *It's time to reduce the accessibility of gambling and increase the accessibility of support for those facing gambling addictions.*

## 2. GAMBLING POLICIES – MAPPING FRAMEWORK

By gambling protection public policies we understand the system of laws, regulatory measures, courses of action, and funding priorities concerning the protection of the public from the deleterious effects of gambling promulgated by a governmental entity or its representatives. To map these gambling protection policies, we first wanted to depict the general regulatory framework of gambling in a state, identifying the main institutions supervising and regulating the domain, the body of laws governing gambling, and the political salience of the gambling harm protection.

- *What are the main laws and regulations on gambling?*
- *Is there a public department (a Gambling Commission) dedicated to regulating gambling and supervising the industry?*
- *What other public departments have responsibilities related to the gambling industry?*
- *Are there discussions in Parliament around future gambling regulation?*

Given that the modern gambling industry has similar characteristics all over the world, and that gambling regulatory environments use a similar inventory of policies, there have been several attempts to sum up and compare these country level regulations. Most of them are authored by legal professionals hired by commercial organizations and are specifically geared for the needs of the gambling industry. One of the most exhaustive is the VIXIO gambling compliance database, a commercial endeavor (VIXIO 2024). There are also a number of more accessible presentations of the regulatory environment for gambling in Europe (SCALEO 2024) (IDG 2024).

**Our study belongs to a different type of activity meant to understand and outline the gambling regulatory framework from a harm reduction perspective.** Similar efforts to map and evaluate the gambling protection environment generally appear in articles published in specialty journals such as *International Gambling Studies*, *Journal of Gambling Studies*, *Addiction*, *Research & Theory* or even in important public health journals such as *The Lancet Public Health*.

The gambling protection policies themselves are a peculiar collection of measures that are characterized by the feature that at a cursory evaluation they appear to reduce gambling harms in the general population or for a specific group of people. Some of these measures even have a specific name, such as *mandatory player identification* or *self-exclusion*, while most of

them can be described only by their content such as *restricting famous people from appearing in gambling marketing materials*.

Organizing such a variety of measures is a challenging task. When it comes to categorizing similar public health policies, Chater and Loewenstein (2023) encourage a distinction between individual-frame perspectives and system-frame perspectives. Individual-frame perspectives are those that focus on individual frailties and vulnerabilities that are deemed responsible for the harms gambling engender. System-frame perspectives pay attention instead to the system of rules, norms, and institutions usually studied by economists, sociologists, legal scholars, and political scientists. Ukhova et al (2024) drew upon these analytical categories while trying to review global legislative changes in gambling policy and to map the prevalence of gambling harm prevention policies.

Livingstone (2023) suggests that public health offers us the categories in which to group the measure for reducing gambling harm. That is, public health responses to non-communicable diseases (of which gambling addiction is part) can be envisioned to embody **‘upstream’, ‘midstream’ and ‘downstream’ interventions**. Upstream measures focus on preventing the development of such addictions in the first place. These interventions are largely preventive. Midstream interventions assist those who are becoming gamblers to develop awareness of the development of an addiction to manage or otherwise address it. Downstream measures include access to treatment and support, including financial and relationship counselling.

On the other hand, Regan et al. (2022) used a less theoretically imbued strategy and created pragmatic groupings for their 103 universal and targeted policies for gambling harm reduction. They chose 7 domains to group these measures, as follows: price and taxation; availability; accessibility; marketing, advertising, promotion, and sponsorship; environment and technology; information and education; and treatment and support.

Following mostly a pragmatic strategy, in order to understand in broad terms how each country regulates the gambling industry to reduce harm, **we grouped these protection policies into five topics**: policies on **harm measurement**, policies on **gambling marketing protections**, policies specific to **land-based gambling** (slot machines venues, casinos), policies specific to **online gambling**, and policies related to **treatment and support**.

The first topic includes policies on harm measurement, research, and data transparency. These measurement and transparency allow the state to understand the evolution of gambling harm and the effect of its policies.

- *Is there a strategy to monitor the prevalence of problematic gambling at a societal level?*
- *Is research funded and organized to monitor the social problems created by gambling?*

- *Is data collected and publicly available on gambling behavior and gross gambling revenue?*

The second topic incorporates policies for restricting gambling marketing. This domain is one of the most dynamic, a host of European countries introducing marketing restrictions in the last five years, some of them going as far as banning almost all gambling advertising.

- *Is daytime gambling advertising allowed on broadcast media (TV, Radio)?*
- *Is internet advertising allowed during daytime?*
- *Can gambling be advertised at sporting events?*
- *Can the gambling industry market itself through sports sponsorship?*
- *Are there content restrictions for ads? Like not allowing exaggerating the chances of winning or presenting participation in gambling as the way to solve financial and personal problems or improving social status.*
- *Can famous people promote gambling products or organizations?*
- *Are there restrictions on marketing campaigns for gambling organizations' usage of billboards, wallscape or mural?*

The third topic includes policies regulating land-based gambling, that is the casinos, bingo halls, slot machines venues, betting parlors, etc. Most of these policies specify certain spatial requirements for the placement of gambling venues or deal with player self-exclusion and mandatory identification.

- *What is the general availability of land-based gambling, specifically measured by the number of EGMs (electronic gambling machines) per capita?*
- *Are there restrictions for land-based gambling spatial density?*
- *What are the rules governing the spatial distribution of gambling establishments?*
- *Can EGMs and other gambling services be located on the same premises?*
- *Is there mandatory player identification for access to the gambling services on the land-based premises?*
- *Can minors gamble on land-based premises?*
- *Can people self-exclude from access to land-based gambling facilities?*

The fourth topic includes policies regulating online gambling. Most of these policies deal with know your customer, minors' protection, self-exclusion, or access to unlicensed gambling providers.

- *Can children engage in online gambling? Are they targeted by ads for gambling?*
- *Can people gamble on sites not licensed to provide gambling services in your country?*
- *Is there a possibility for individuals to voluntarily exclude themselves from access to online gambling?*

The fifth topic comprises policies regulating treatment and support for those who deal with gambling addiction and other problems related to gambling.

- *Do public healthcare services offer support and treatment options for gambling-related issues?*
- *Does the private health system offer treatment and support solutions?*
- *Is treatment for gambling problems paid for by public funds?*

## 3. GAMBLING PROTECTION INDEX

### 3.1 Modern Gambling and the Gambling Establishment

One of the best descriptions of the modern world of gambling can be found in Jim Orford's works. He uses the term Gambling Establishment to label the industry and its allies inside and outside government, that is the organizations selling gambling services, the government institutions supporting them, the network of media and advertising actors promoting it, the business support firms acting for them (Orford 2019). Using similar strategies all around the world, trans-national gambling operators built such national level gambling establishments, powerful coalitions which collectively have been responsible for the modern growth in gambling in most countries and therefore for the harm it is causing (de Lacy-Vawdon, Vandenberg, and Livingstone 2023)

An important aspect of the modern world of gambling is that the product that is being pushed by this coalition is a novel one. The EGMs in 2025 are sophisticated and high-powered

machines, being more colorful, shinier, sounding better, having new games and offering much more engaging experiences than the slots of the 1990s. Then there are the many ways in which gambling can be offered online, the greater diversity of sports betting offering or the choice to gamble on numerous events 24 hours a day, the constant TV advertisements and online bonuses and promotions. In a way, comparing the gambling experiences of 2020s to their precursors from 20 or 40 years ago it's like comparing the contemporary smartphone and its ecosystems to the mobile phones of the 1990s. (Nikkinen, Marionneau, and Egerer 2022)

Modern gambling is characterized by large investments in marketing, new gambling products designed to be as immersive as possible, extreme accessibility through online delivery, and insistence on creating coalitions with sports teams and mass-media. **This well-designed, high-speed and high-powered addictive product, supported by a large coalition of social actors proves to have a spectacular impact on the societies upon which it is being unleashed. Unfortunately, not a positive one.**

### 3.2 Gambling Harm and Total Consumption Model

Until a few years ago, the only harm from gambling that enjoyed large recognition was addiction to gambling. Recent research shows instead that the negative impacts of gambling on health and wellbeing are more significant than previously recognized. These negative effects go beyond those experienced by the population who could be diagnosed with the clinically defined Gambling Disorder from the DSM-5 or those who would get a high score on Problem Gambling Severity Index (PSGI). Even people who engage less intensively with gambling have negative health, well-being and leisure outcomes. Similarly, gambling is associated with higher rates of future unemployment and physical disability across the involvement spectrum. Even apparently moderate and non-problematic gambling measured through percentage of total spend dedicated to gambling has also been recently highlighted as associated with financial distress or health issues (Muggleton et al. 2021). Following sports betting deregulation in the United States we see rapid financial situation deterioration especially for low-income gamblers' families (Baker et al. 2024). In the summer of 2024, the Brazilians were directly using 20% of their welfare income (Bolsa Familia) to gamble online all the while also accumulating small loans with very high interest. (Martha Viotti Beck 2024)

In an effort to categorize the effects of gambling, Browne (2016) observes that **harm from gambling occurs at three broad levels**. At one level is **the harm to the person who gambles**, the effect of gambling on their health, emotional state, relationships, financial situation, employment status. At the next level is **the harm that occurs to the family and friends of the person who**

**gamblers**, who are referred to in literature as concerned significant others. But there's also another level at which **harm is manifested and this is the community**.

To evaluate the different types of gambling policies and their impact on societies we rely heavily on a model of the relationship between total consumption of gambling at the society level and gambling harm at the society level called the total consumption model (TCM). As with many other concepts used to evaluate the impact of gambling on society, it originates from alcohol epidemiology. There, it posits a close relationship between total consumption of alcohol and prevalence of heavy drinkers in a society. In the alcohol epidemiology literature, empirical evidence in support of the extended TCM is very strong (Norström and Ramstedt 2005). In the field gambling the main review papers analyzing the evidence for this connection are Rowstow (2019) and Kesaite et al (2024). Kesaite concludes that *Rosow previously highlighted the small, but consistent body of evidence supporting the application of the TCM to gambling. Our review extends and updates this work, finding further evidence for some of the central tenets which underlie this theory.*

### 3.3 Gambling Protection Index

Building upon the codifications from the previous chapter, we evaluate the policies aimed at protecting society from the harm created by the modern gambling establishment and organize the efficient ones into a composite index. Such an index tries to offer a succinct view of effective gambling regulations in different countries and helps outline the different domains of gambling regulation more easily. The Gambling Protection Index can help both with the comparisons between countries and when updated on a regular basis, give an overview of the evolution of the harm protection situation over time. Moreover, we hope this index allows stakeholders to design better policies to prevent or mitigate risks and should encourage positive developments.

This policy index approach has been deployed in many domains, the most informative for our purpose being those indexes meant to evaluate the alcohol policies for different countries. One of the first attempts to standardize the measurement and presentation of alcohol policies dates from 2007, the Alcohol Policy Index (Brand et al. 2007) while probably the most recent one is from 2021, the International Alcohol Control (IAC) policy index (Casswell et al. 2022). The latter index aims to reduce the number of dimensions evaluated and focuses only on those having a significant effect.

Based on these alcohol control indexes, the way that the World Health Organization organizes alcohol policies in its Global Information System on Alcohol and Health (GISAH) and on the above efforts to categorize the different types of gambling protection measures, we propose

the following four domains for grouping the gambling protection measures including the measures proven to have a significant gambling harm reduction effect:

1. **Measurement, Research, Data Transparency** - Does the regulator collect data on gambling behavior and gross gambling revenue AND share it with the media and the research community? (Yes - 1/ No - 0).
2. **Marketing Controls** - Is gambling marketing to the general public banned completely other than at most a couple of hours during late night or through the search engines with keywords strictly related to gambling? (Yes - 1/ No - 0). ; Are promotional messages and financial inducements allowed for those who are already clients of gambling providers? (Yes - 0/ No - 1).
3. **Gambling Venues and EGM Restrictions** - What percentage of the population live more than 5 kilometers away from any EGM? (estimated percentage)
4. **Treatment and Support for Gamblers with Problems** - What percentage of the population live within 50 kilometers of a specialized addiction clinic? (estimated percentage).

#### 1. Measurement, Research, Data Transparency

On this subdomain we include measures such as organizing and funding surveys to understand the prevalence and spectrum of gambling addiction and other harmful gambling behaviors, financing research projects in order to evaluate or find solutions for improving puntual gambling behavior problems, data collection on gross gambling revenue for each type of gambling activity, collecting and making gambling behavior data transparent and accessible to both the research community and media organizations. To reduce and control gambling harm and addiction, research and data are essential instruments for most regulators.

We select a complex measure from the above list for inclusion in this index. This complex measure captures the important aspect of gambling data collection and transparency by the government:

- Does the regulator collect data on gambling behavior AND gross gambling revenue AND share it with the media and the research community? Yes/No.

## 2. Marketing Controls

On this subdomain we include a large number of measures such as daytime broadcast advertising bans, social media advertising restrictions, outdoor advertising restrictions, ad content restrictions, such as interdictions to presenting participation in gambling as the way to solve financial and personal problems or improving the social status, minors targeting bans, etc.

As the more detailed analysis from the dedicated chapter shows, most of these measures have low efficacy as the large marketing budgets of the gambling organizations can easily find new channels and modalities to reach the population and entice them to engage with their products. Blocking a marketing channel will not have meaningful effects on reducing gambling harm.

We selected only two specific measures in this subdomain for inclusion in the index, as they are the only ones with proven significant impact on reducing harm:

- *Is gambling marketing to the general public banned completely other than just a couple of hours during late night or through the search engines with keywords strictly related to gambling? Yes/No.*
- *Are promotional messages and financial inducements allowed for those who are already clients of gambling providers? Yes/No.*

## 3. Gambling venues and EGM restrictions

On this subdomain we include policy measures such as restricting gambling venues spatial density, restricting gambling venue hours, banning smoking and alcohol in gambling locations, banning minors from gambling in these venues, restricting EGMs to special locations (casinos), restricting the number of venues, restricting the number of EGMs, mandatory player identification, daily loss limits for EGMs.

While all these measures have a small positive effect, we can confidently identify only one essential measure that reduces the harmful effects of gambling, and that is the reduced availability of access to gambling venues. At one end of the availability spectrum, we have slot machines available in any bar or coffee shop while on the other end of the spectrum we have slot machines located only in special casinos placed outside the cities.

In order to succinctly measure the restricted availability of gambling we propose to evaluate the availability of slot machines by estimating the ease of physical access to an EGM for a regular citizen:

- *What percentage of the population live more than 5 kilometers away from any EGM? (estimated percentage)*

#### 4. Treatment and support for problem gamblers

As the epidemic of gambling problems is a relatively recent phenomenon, we don't have a history of trying different policy solutions for supporting those affected by it. Fortunately, at an individual level we understand what kind of therapeutic help and medication solutions to offer to those affected. There are a large number of barriers to seeking treatment and support for gambling problems, but none are larger than the lack of specialized treatment or its availability only in one or two large cities.

In order to succinctly measure the access to treatment and support for gambling problems, we propose to evaluate treatment availability by estimating the ease of physical access to a specialized addiction clinic for a regular citizen:

- *What percentage of the population live within 50 kilometers of a specialized addiction clinic? (estimated percentage)*

### 3.4 Marketing Controls

#### Literature review

The gambling industry uses the various toolkits of marketing for many goals. Of course, it aims to directly acquire clients who should sign up today and start engaging with their products. It also aims to keep these clients spending. But there are many less direct goals that the industry uses marketing for. One such functionality that the gambling establishment deploys marketing for is the normalization of gambling in society. And the results are obvious all over the world, as the social acceptability of gambling has increased significantly while the risks of this behavior have been underestimated until recently. Most obviously it also tries to embed gambling as an 'everyday' activity aligned with the experience of sport.

Another functionality of gambling marketing is to present and solidify the images and narratives that that gambling is fun, an effortless way to win money, and that everyone is gambling.

In recent discussions about gambling marketing, there has been an overwhelming focus on televised sport. While this is important, gambling marketing is much broader than this and includes a range of direct and indirect strategies including various promotions, incentives, sponsorships, and corporate social responsibility and public relations initiatives. We note that in this context, there has been significant investment in other areas of public health (such as junk food, alcohol, and tobacco) to map and monitor marketing and its impact on population groups [Alcohol and Drug Foundation 2021; Australian Medical Association 2012; Carpenter, Wayne & Connolly 2005; Mackay et al. 2011; Wood et al. 2020]. There has not been a similar focus or

commitment in relation to gambling, not even from government agencies tasked with preventing or minimizing gambling harm.

In 2023, after completing a very thorough review of online gambling and gambling advertising in Australia, The Standing Committee on Social Policy and Legal Affairs of the Parliament of Australia after receiving powerful evidence from people with lived experience of online gambling harm, from academic and health experts, and community organizations recommended that:

*“The Committee recommends the Australian Government, with the cooperation of the states and territories, implement a comprehensive ban on all forms of advertising for online gambling, to be introduced in four phases, over three years, commencing immediately:*

*Phase One: prohibition of all online gambling inducements and inducement advertising, and all advertising of online gambling on social media and online platforms. Removal of the exemption for advertising online gambling during news and current affairs broadcasts. Prohibition of advertising online gambling on commercial radio between 8.30-9.00am and 3.30-4.00pm (school drop off and pick up).*

*Phase Two: prohibition of all online gambling advertising and commentary on odds, during and an hour either side of a sports broadcast. Prohibition on all in-stadia advertising, including logos on players’ uniforms.*

*Phase Three: prohibition of all broadcast online gambling advertising between the hours of 6.00am and 10.00pm.*

*Phase Four: by the end of year three, prohibition on all online gambling advertising and sponsorship.” (House of Representatives Standing Committee on Social Policy and Legal Affairs, Parliament of Australia 2023)*

In 2023, after evaluating the evidence on gambling harm and effective measures, Belgium joined the ranks of countries banning most forms of advertising for the gambling industry. One of the most interesting aspects is that it reiterates inside the law why such drastic measures are required:

*Advertising for gambling has at least three major effects: 1. 1. Advertising plays an important role in recruiting new players; 2. 2. Advertising influences gambling behavior and encourages players to engage in more intensive playing behavior; 3. 3. Advertising increases the chance of relapsing among gambling addicts. Advertising also ensures a normalization of gambling in society. Advertising proposes gambling as socially and culturally accepted behavior and a legitimate leisure activity. This is detrimental for the more vulnerable groups, such as minors, young people and gambling addicts.*

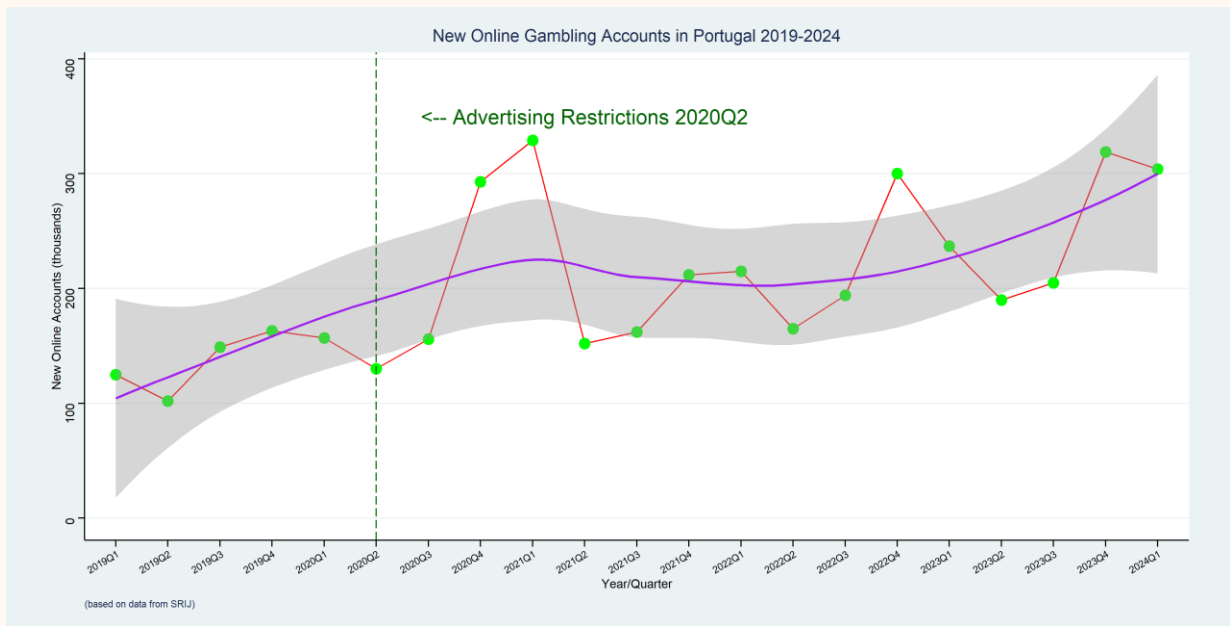
## Comparison of the Impact of Gambling Marketing Policies Changes in Portugal and Spain

In early 2020, Portugal undertook what it claimed to be a major change in its rules on gambling advertising. A newspaper article from that period presents the context in which the gambling supervising authority (SRIJ), consulting the gambling operators, created a new advertising framework.

*“According to the newspaper Público, the SRIJ designed the new manual after listening to the associations of casinos, bingos, betting and online gambling operators. In addition to limiting advertising hours, the new set of rules also lists several “recommendations” such as the fact that advertisements should not suggest that gambling can “develop personal qualities”, be “a solution to financial problems” or even “create the illusion that a person can win large amounts from gambling and betting”. It is also stated that all advertisements must include a reference to the entities that deal with gambling addiction and that, on social networks, these advertisers must activate mechanisms that allow limiting access to minors.” (Fernandes 2020)*

Portugal collects and makes public information about the main indicators of its gambling market. Therefore, we can evaluate the effects of these regulatory changes by reading the trajectories of some of the most important indicators of total gambling consumption in the Portuguese society.

One first indicator, which should be directly influenced by effective marketing restrictions, is the number of new accounts created with online gambling operators. Surprisingly, (or rather unsurprisingly for a policy basically created together with the industry it claims to regulate) we do not notice here any impact. The number of accounts created each quarter increased almost monotonously from about 130.000 in the second quarter of 2020, when the gambling marketing regulatory framework become more restrictive, to 304.000 in the first quarter of 2024.



A second indicator for the overall gambling activity of the Portuguese society is the number of active online accounts each quarter. Here we see a similar explosive growth, from 433.000 active accounts in the second quarter of 2020 to about 1.100.000 accounts in the first quarter of 2024.



The third indicator we explore also presents a spectacular evolution. From just 68 million gross revenues for the online gambling industry in the second quarter of 2020 we reach an explosive 260 million in the first quarter of 2024.

Overall, the marketing restrictions appear to have had no positive impact on protecting the Portuguese society from the harm associated with the new gambling industry.

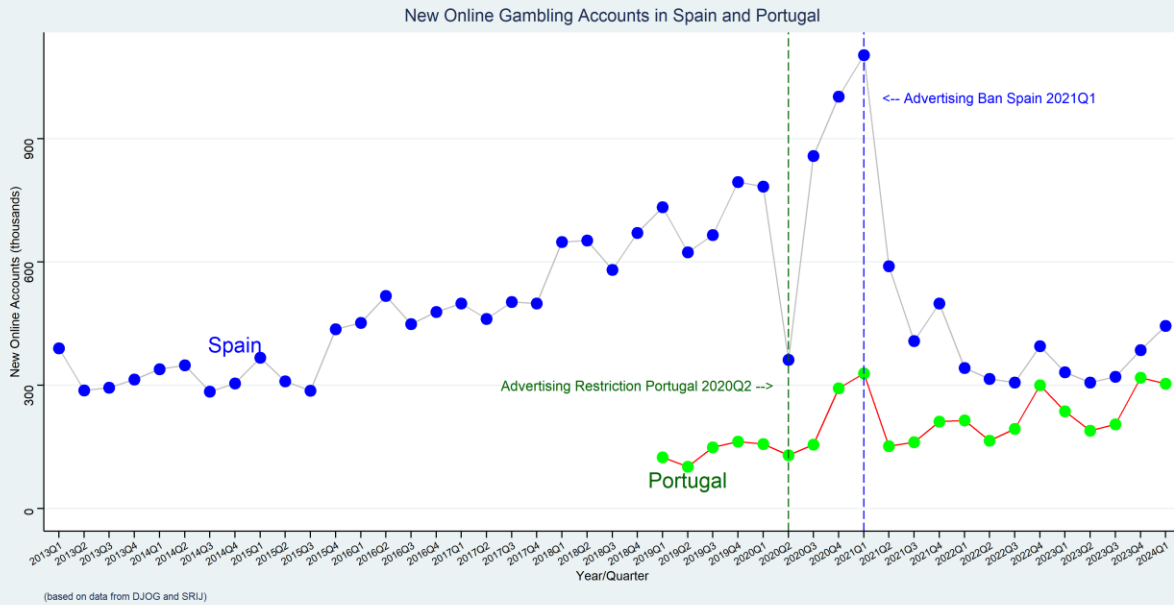
At this point, one might suggest that maybe society has changed, technology is taking over our lives, people are more and more inclined to chase fun through gambling, and basically there's not much one government can do to protect its citizens.

**But fortunately, even in our small policy analysis universe of only 4 countries, we can see how good policies perform in limiting the harm and explosion of online gambling. In the fall of 2020, Spain changed completely its rules for gambling marketing. Most marketing, including TV advertising and online advertising, was limited to 4 hours during late night:**

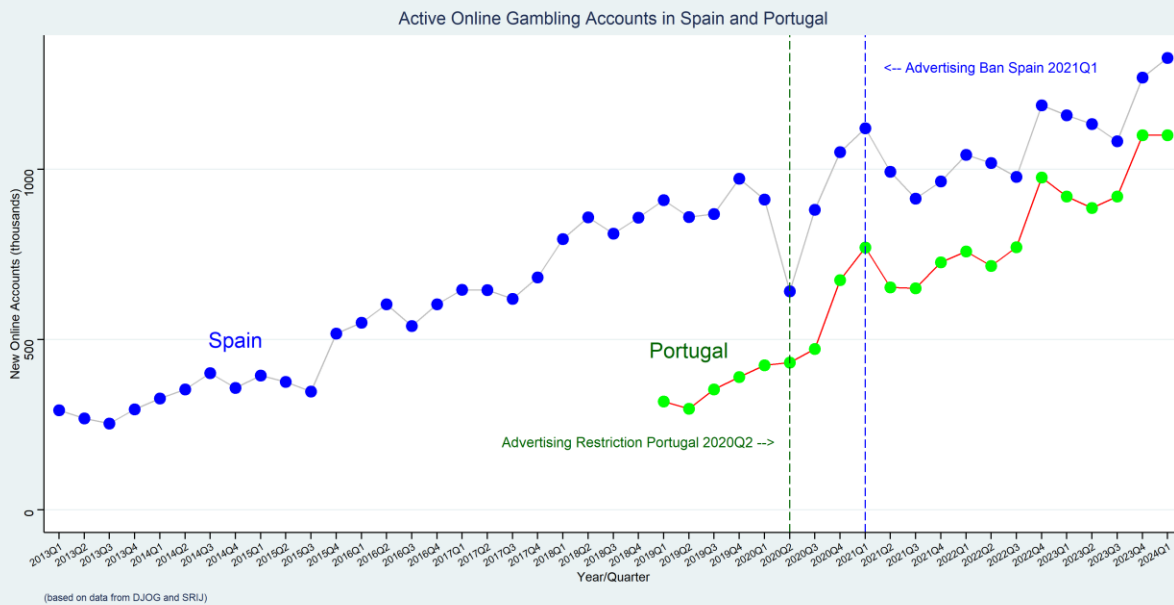
- *Broadcast advertising for online gambling and betting will only be allowed between 1AM and 5AM.*
- *It is thus prohibited to broadcast gambling advertising during sporting events that take place outside these hours.*
- *The offering of bonuses or similar promotions to attract new players is prohibited.*
- *Sports clubs may not sign sponsorship contracts with online gambling or betting operators that would display advertising on shirts, equipment, or stadium billboards.*
- *Outdoor advertising must follow the provisions of the Royal Decree and the regulations established by each Autonomous Community.*
- *Advertising on the internet must be done through the web pages of the game operators.*

As this new gambling marketing framework replaced a very liberal one, its effects on several online gambling prevalence indicators became immediately noticeable. Most visibly, **the number of new online accounts was reduced by almost two thirds compared with the previous period of basically unrestricted gambling marketing.**

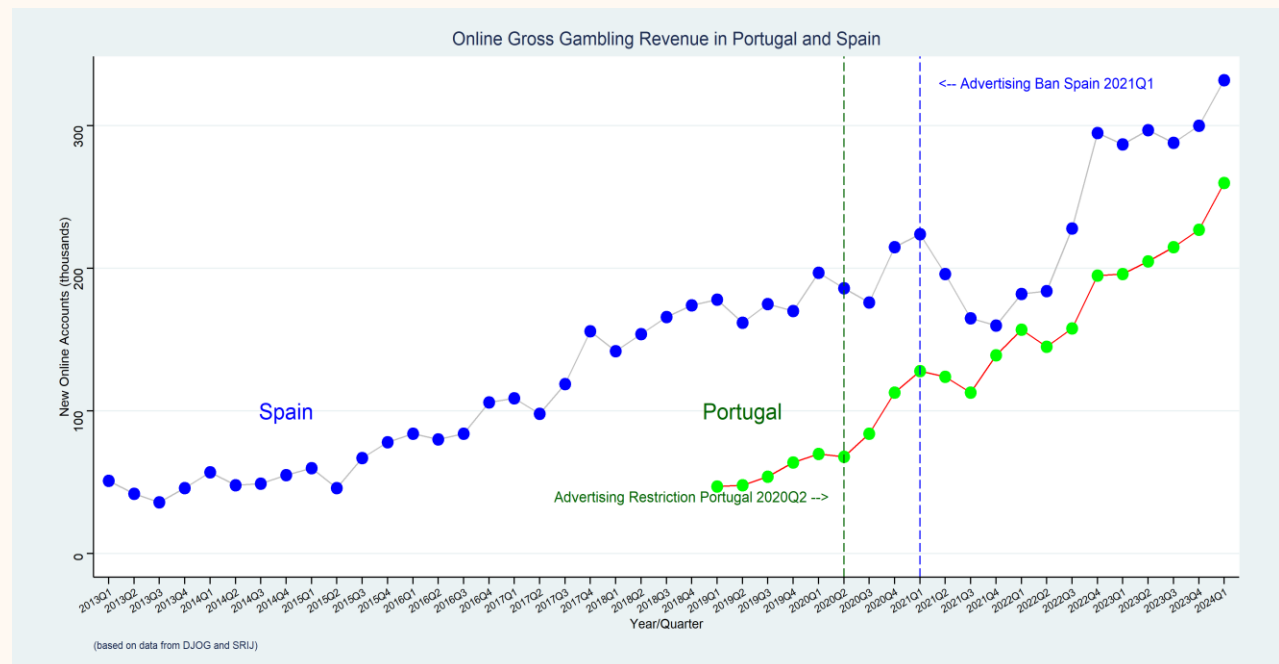
While the gambling marketing restrictions from Portugal did not have any visible influence on the number of new gambling accounts, the effective gambling marketing rule changes from Spain immediately impacted the rate at which new online gambling accounts were created. We have identified a situation where a country with a population 4.5 times larger but with effective marketing restriction has almost the same number of new online gambling accounts created each quarter as Portugal, while 5 years before, when the gambling marketing policies were similar, the ratio was much higher.



A second effect of implementing effective gambling harm protection measures in Spain is the plateauing of online gambling activity as measured by the number of monthly active accounts. Here again, Portugal has almost the same number of active online gambling accounts as a country with a population 4.5 times larger, when 5 years ago the ratio was more or less similar to that of their populations.



The previous situation is also confirmed by the gross gambling revenue (GGR) for the online gambling industry. Portugal's online GGR increased rapidly, and almost caught up with Spain's online GGR as the gambling industry in Portugal was basically allowed to deploy all its marketing tricks through almost the entire variety of communication channels available to any normal industry.



Even if Spain managed to stabilize its online gambling market in 2021 by implementing good gambling marketing policies, recent data show that the amount of money spent on online gambling started to increase again. In parallel, the marketing spending of the online gambling industry for financial incentives reached half of its marketing expenditure.

While financial incentives and promotions were banned for new clients, the 2020 Spanish gambling marketing framework allows promotions to be offered to customers that have had an account open for at least 30 days and have been appropriately verified. And we see a change of direction for the online gambling operators in Spain towards increasing their marketing push to those people who already have an account with them.

While the public marketing restrictions in Spain proved to be highly effective in protecting the general public who didn't have an account with the gambling operators, it abandoned the few millions of citizens who already had an online gambling account. And exactly among this population the harm from gambling is already high.

**Belgium is one of the first countries tackling this issue of enticing account holders to gamble. Their new gambling framework includes a ban on gambling inducements, such as**

**bonuses or free bets even for customers.** This move is aimed at curbing the allure of gambling and reducing the risk of gambling addiction among the population and also protects those who already engage in gambling.

Our selection of the two indicators for efficient gambling marketing regulation follows the suggestions of the Australian Parliament Commission, the analysis of the effect of policy changes in Portugal and Spain, and the larger scientific consensus forming around the necessity to drastically reduce the promotion of gambling in order to reduce the societal level gambling harm.

### 3.5 Policies regarding gambling venues and EGM restrictions

EGMs are amongst the most harmful forms of gambling and reducing total consumption of EGM gambling and exposure to EGMs in non-casino locations is one of the best strategies to reduce gambling harm.

If some forms of gambling like lotteries are associated with low levels of harm, the percentage of people confronting with gambling disorders increases significantly when it comes to those who take part in EGM gambling (Tran et al. 2024). Moreover, there is an important distinction to be made between allowing people the freedom to engage in potentially dangerous activities such as smoking or EGM gambling and creating clusters of EGM gambling opportunities at each corner street associated also with instant credit option right next door (pawn shops, instant credit agencies) and intensely promoting such activities with numerous billboards and TV commercials, endorsed by highly valued people and influencers.

About 20 years ago, reflecting the gambling ecosystem of that time, one of the most intensively studied aspects of gambling was the relationship between the physical accessibility of slots and people's behavior. In this sense, the focus is on the characteristics of the gambling physical environment, the spatial distribution of EGM exposure. These older studies (pre-internet gambling, pre-widespread gambling advertising, pre-normalization of gambling) show gambling venue proximity as the main factor associated with gambling harms. (Vasiliadis et al. 2013)

**One of the larger studies that aimed to evaluate gambling behaviors and EGM expenditure in relation to the distance travelled to the gambling venue found that a distance of about 3.5 km represented a threshold in relation to gambling losses incurred. While the EGM gamblers who lived within this 3.5 km circle lost on average about \$2000 (Australian dollars) annually, those who had to travel more than a few kilometers lost only about \$500.** The difference is not explained only by the smaller number of trips to the gambling venues, but it also reflects gambling attachment differences. (Marshall et al. 2007) In other words, lowering the accessibility of slots by separating them from the residential areas by at least 4-5 kilometers has a major protective effect, reducing significantly the financial burden on those who gamble on EGMs.

When it comes to policies that reduced the availability of EGMs, we have many examples from the last few years. The most significant and large-scale reduction was the period of 2020-2022 when COVID lockdowns and other mandatory restrictions were associated with an important reduction in gambling losses and problematic gambling. **Large reductions in the availability of EGMs produce important reductions in gambling harm** (Hodgins and Stevens 2021; Sachdeva, Sharma, and Sarangi 2022). **At the same time, restrictions on EGMs availability entails only a very small proportion of migration to online gambling** (Marionneau et al. 2024)

Conversely, reductions in the number or types of EGMs without being associated with a large decrease in gambling venue availability does not reduce gambling harms in a significant way (Marionneau et al. 2022)

**In Piedmont, Italy, starting in 2016, significant reductions in EGMs availability and small restrictions on opening hours were connected to a sharp reduction in EGM gambling consumption, a reduction of at-risk gambling, and a reduction in help-seeking.** The reduction in the availability of gambling venues was reached by banning the placement of EGM gambling venues within a certain distance (500 meters in larger municipalities, 300 in the smaller ones) from places considered sensitive, such as schools, banks or residential facilities for the elderly. This increased considerably the residential distance from gambling venues. (IRES-Instituto di Ricerche Economiche e Sociali per il Piemonte 2021)

Our selection of a safety threshold of 5 kilometers from EGM gambling venues is a conventional one based upon the results of these studies. As an illustration of the effect of such availability reductions, strategies to limit EGM gambling only to a number of casinos prove to be very effective such as in Portugal's case or in the state of Western Australia, where a significantly lower proportion of people reported experiencing harm either directly or from another person's gambling, compared to the rest of Australia. (Russell et al. 2023)

### 3.6 Treatment and support

When it comes to evaluating the policies of problematic gambling treatment and support, we have to switch strategies. Whereas for evaluating marketing restrictions and EGM availability restrictions, we could rely on a large body of policy research and use the data collected by gambling regulators by ourselves, when evaluating treatment institutions we have to fall back on experts opinion. (McArthur et al. 2015)

While the private sector has been the first to provide solutions to the substantial increase in demand for counselling and support for gambling problems, the public healthcare sector has also responded. Policies to increase access to treatment and support for gambling harm have been developed over most of Europe in the past few years. For example, we saw the expansion

of specialized counselling projects to increase awareness of the risks and harms linked with gambling, associated with the imposition of levies on the industry to fund these initiatives.

**But no country has invested as much effort into designing and implementing a performant treatment and support system as the United Kingdom.** Their efforts included:

- researching the treatment and support needs of the gambling population (Dinos et al. 2020)
- developing a modern guideline for gambling-related harms including identification, assessment and management (<https://www.nice.org.uk/guidance/indevelopment/gid-ng10210>)
- expanding the network of specialized gambling clinics all over the country
- continuously evaluating the gambling treatment system (<https://www.gov.uk/government/publications/gambling-treatment-assessing-the-current-system-in-england/gambling-treatment-assessing-the-current-system-in-england>).

NHS (National Health System), drawing on the above-mentioned research efforts, but also on their own expert knowledge and experience of existing models of care, such as:

- the alcohol pathway for England or
- the routes to recovery pathway for substance use,
- the Improving Access to Psychological Therapies (IAPT) program, and
- existing gambling service models around the world,

developed a **gambling support system** including the **National Gambling Helpline** supplemented by a **nationwide network of specialist gambling clinics**.

We follow their lead by evaluating that the **local availability of specialized addiction treatment delivered through a specialized addiction clinic** is the best solution to help those who struggle with gambling problems. We measure this availability of care estimating the percentage of population living within 50 kilometers of a specialized addiction clinic.

## 4. COMPARATIVE ANALYSIS OF THE GAMBLING PROTECTION POLICIES IN FOUR COUNTRIES

This chapter provides a **summary comparative analysis of gambling harm protection policies in four European Union member states: Croatia, Romania, Portugal, and Spain**, represented by the four partners in this project. It draws mainly upon the four brief country reports included in this project.

The previous chapters analysis concludes with best practices policy recommendations for developing a robust and sustainable framework for gambling harm reduction. Now we map the presence or absence of specific policies and evaluate how effective the gambling harm reduction systems of each country are.

At a general level, a clear convergent trend across all four nations is **the increasing adoption of a public health paradigm to frame and address gambling-related harm**.

This shift is characterized by **stricter controls on advertising**, particularly those aimed at protecting minors, and fostering the development of robust, cross-operator **national self-exclusion systems**.

Key among these is the understanding that **youth and young adults represent a universal crisis point, demanding targeted, evidence-based interventions**. The impact gambling has on children and young adults is one of the main drivers at a political level for improving gambling harm protection policies.

**Another trend is the reduction of availability of EGM**. Portugal only allows EGMs in casinos, while Romania recently banned the placement of EGMs in small cities. Croatia just passed a new gambling protection law that will reduce the density of EGM locations.

Table 1: Gambling Protection Policies in Four Countries – (a value of '1' indicates the presence of a specific gambling protection policy within a given country, whereas a value of '0' indicates its absence)

|   |   |   | <i>Croatia</i> | <i>Portugal</i> | <i>Romania</i> | <i>Spain</i> |
|---|---|---|----------------|-----------------|----------------|--------------|
| <i>Measurement, Research, Data Transparency</i> | Problematic gambling monitoring         | <i>Is there a strategy to monitor the prevalence of problematic gambling at a societal level?</i> | 1              | 1               | 0              | 1            |
|   | Gambling research funding               | <i>Is research funded and organized to monitor the social problems created by gambling?</i>       | 0              | 1               | 0              | 1            |
|   | Data transparency                       | <i>Are data collected and publicly available on gambling behavior and gross revenue?</i>          | 0              | 1               | 0              | 1            |
| <i>Marketing</i>                                | Daytime TV Restrictions                 | <i>Is daytime gambling advertising allowed on broadcast media (TV, Radio)?</i>                    | 0              | 1               | 0              | 1            |
|   | Daytime internet marketing restrictions | <i>Is internet advertising allowed during daytime?</i>  | 0              | 0               | 0              | 1            |

|  |   |  |   |   |   |   |
|--|---|--|---|---|---|---|
|  | Sporting events marketing restrictions        | <i>Can gambling be advertised at sporting events?</i>  | 0 | 0 | 0 | 1 |
|  | Sports sponsorship restrictions               | <i>Can the gambling industry market itself through sports sponsorship?</i>   | 0 | 0 | 0 | 1 |
|  | Advertising content restrictions              | <i>Are there content restrictions for ads? Like not allowing exaggerating the chances of winning or presenting participation in gambling as the way to solve financial and personal problems or improving social status.</i> | 1 | 1 | 1 | 1 |
|  | Famous people marketing gambling restrictions | <i>Can famous people appear in the marketing products of gambling organizations?</i>   | 0 | 1 | 0 | 1 |
|  | Outdoor advertising restrictions              | <i>Are there restrictions on marketing campaigns for gambling</i>  | 1 | 0 | 0 | 1 |

|                            |                                 |   |      |      |        |        |
|----------------------------|---------------------------------|---|------|------|--------|--------|
|                            |                                 | <i>organizations' usage of billboards, wallscape or mural?</i>  |      |      |        |        |
| <i>Land-based gambling</i> | EGM penetration                 | <i>What is the general availability of land-based gambling, specifically measured by the number of EGMs per capita?</i> | High | Low  | High   | High   |
|                            | EGM spatial density             | <i>Are there restrictions for land-based gambling spatial density?</i>  | High | Low  | High   | High   |
|                            | EGM location restrictions       | <i>What are the rules governing the spatial distribution of gambling establishments?</i>                                | Low  | High | Medium | Medium |
|                            | Multi-product premises          | <i>Can EGMs and other gambling services be found on the same premises?</i>  | 0    | 0    | 0      | 0      |
|                            | Mandatory player identification | <i>Is there mandatory player identification for access to the</i>   | 1    | 1    | 1      | 1      |

|                        |                                       |   |   |   |   |   |
|------------------------|---------------------------------------|---|---|---|---|---|
|                        |                                       | <i>gambling services on the land-based premises?</i>  |   |   |   |   |
|                        | Minors on gambling premises           | <i>Can minors gamble on land-based premises?</i>  | 1 | 1 | 1 | 1 |
|                        | Self-exclusion from gambling premises | <i>Can people self-exclude from access to land-based gambling facilities?</i>                               | 1 | 1 | 1 | 1 |
| <i>Online gambling</i> | Minors in online gambling             | <i>Can children engage in online gambling? Are they targeted by ads for gambling?</i>                       | 1 | 1 | 1 | 1 |
|                        | Unlicensed                            | <i>Can people gamble on sites not licensed to provide gambling services in your country?</i>                | 0 | 0 | 0 | 0 |
|                        | Self-exclusion                        | <i>Is there an option for individuals to voluntarily exclude themselves from access to online gambling?</i> | 1 | 1 | 1 | 1 |

|                              |  |   |   |   |   |   |
|------------------------------|--|---|---|---|---|---|
| <i>Treatment and support</i> | Public healthcare solutions for gambling problems  | <i>Do public healthcare services offer support and treatment options for gambling-related issues?</i> | 1 | 1 | 0 | 1 |
|                              | Private healthcare solutions for gambling problems | <i>Does the private health care system offer treatment and support solutions?</i>                     | 1 | 1 | 1 | 1 |
|                              | Public funding for treatment                       | <i>Is treatment for gambling problems paid for by public funds?</i>                                   | 1 | 1 | 0 | 1 |

When it comes to evaluating the effectiveness of the gambling protection policies framework, we notice both performant systems like Spain and low effective protection systems like Romania, but also countries that engage in radical transformations like Croatia.

**Croatia** is about to dramatically improve its system for preventing gambling harm. As of June 2025, there are very few effective protections in place. However, new laws adopted in April 2025 will create a much stronger system starting in 2026.

**Table 2: Croatia GPI**

| <i>Domain</i>                                   | <i>Indicator</i>   |
|---|--|
| <i>Measurement, Research, Data Transparency</i> | Does the regulator collect data on gambling behavior and gross gambling revenue AND share it with the media and the research community? NO 0 |

|   |  |     |     |
|---|--|-----|-----|
| <i>Marketing Controls</i>                               | Is gambling marketing to the general public banned completely other than at most a couple of hours during late night or through search engines with keywords strictly related to gambling? | NO  | 0   |
|   | Are promotional messages and financial inducements allowed for those who are already clients of gambling providers?  | YES | 0   |
| <i>Gambling Venues and EGM Restrictions</i>             | What percentage of the population live more than 5 kilometers away from any EGM? (estimated percentage)  | 10% | 0.1 |
| <i>Treatment and Support for Gamblers with Problems</i> | What percentage of the population live within 50 kilometers of a specialized addiction clinic? (estimated percentage)  | 50% | 0.5 |
| <i>Total</i>  |  |     | 0.6 |

**Portugal** maintains a balanced approach, with a reduced availability of EGMs complementing a systematic approach to monitoring the gambling harm but with insufficient protections when it comes to online gambling and gambling marketing.

**Table 3: Portugal GPI**

| <i>Domain</i>                                   | <i>Indicator</i>   |     |   |
|---|--|-----|---|
| <i>Measurement, Research, Data Transparency</i> | Does the regulator collect data on gambling behavior and gross gambling revenue AND share it with the media and the research community?  | YES | 1 |
| <i>Marketing Controls</i>                       | Is gambling marketing to the general public banned completely other than at most a couple of hours during late night or through search engines with keywords strictly related to gambling? | NO  | 0 |
|   | Are promotional messages and financial inducements allowed for those who are already clients of gambling providers?  | YES | 0 |

|   |   |     |     |
|---|---|-----|-----|
| <i>Gambling Venues and EGM Restrictions</i>             | What percentage of the population live more than 5 kilometers away from any EGM? (estimated percentage)               | 10% | 0.1 |
| <i>Treatment and Support for Gamblers with Problems</i> | What percentage of the population live within 50 kilometers of a specialized addiction clinic? (estimated percentage) | 0%  | 0   |
| <i>Total</i>  |   |     | 1.1 |

**Romania's** framework is characterized by very limited and fragmentary efforts to protect its population and is also confronted by significant institutional challenges regarding its gambling authority that have undermined regulatory credibility. As of 2025, almost none of the effective gambling protection policies are implemented.

**Table 4: Romania GPI**

| <i>Domain</i>                                   | <i>Indicator</i>   |     |     |
|---|--|-----|-----|
| <i>Measurement, Research, Data Transparency</i> | Does the regulator collect data on gambling behavior and gross gambling revenue AND share it with the media and the research community?  | NO  | 0   |
| <i>Marketing Controls</i>                       | Is gambling marketing to the general public banned completely other than at most a couple of hours during late night or through search engines with keywords strictly related to gambling? | NO  | 0   |
|   | Are promotional messages and financial inducements allowed for those who are already clients of gambling providers?  | YES | 0   |
| <i>Gambling Venues and EGM Restrictions</i>     | What percentage of the population live more than 5 kilometers away from any EGM? (estimated percentage)  | 50% | 0.5 |

|   |   |    |     |
|---|---|----|-----|
| <i>Treatment and Support for Gamblers with Problems</i> | What percentage of the population live within 50 kilometers of a specialized addiction clinic? (estimated percentage) | 0% | 0   |
| <i>Total</i>  |   |    | 0.5 |

**Spain** represents a successful, data-driven system, but whose regulatory trajectory is now being influenced by judicial review. Nevertheless, it already implements a large number of effective gambling protection policies and current political conversations aim to further improve the situation.

**Table 5: Spain GPI**

| <i>Domain</i>   | <i>Indicator</i>   |     |     |
|---|--|-----|-----|
| <i>Measurement, Research, Data Transparency</i>         | Does the regulator collect data on gambling behavior and gross gambling revenue AND share it with the media and the research community?  | YES | 1   |
| <i>Marketing Controls</i>                               | Is gambling marketing to the general public banned completely other than at most a couple of hours during late night or through search engines with keywords strictly related to gambling? | YES | 1   |
|   | Are promotional messages and financial inducements allowed for those who are already clients of gambling providers?  | YES | 0   |
| <i>Gambling Venues and EGM Restrictions</i>             | What percentage of the population live more than 5 kilometers away from any EGM? (estimated percentage)  | 50% | 0.5 |
| <i>Treatment and Support for Gamblers with Problems</i> | What percentage of the population live within 50 kilometers of a specialized addiction clinic? (estimated percentage)  | 50% | 0.5 |
| <i>Total</i>  |  |     | 3.0 |

## 5. COUNTRY SPECIFIC RECOMMENDATIONS FOR IMPROVING POLICIES

### 1. CROATIA:

- **Reduce the gambling advertising impact on children**
  - a. It is necessary to more strictly check and penalize ads of the gambling industry that have visuals attractive for children and young people. The current practice is characterized by an overly relaxed approach when interpreting the visual identity of individual advertisements.
  
- **Increase treatment options all over the country**
  - a. Specialized day hospitals for the treatment of gambling addiction should be available in at least four main regions of Croatia, i.e. the four largest Croatian cities (Zagreb, Split, Rijeka and Osijek). Currently, such options are available only in Zagreb.
  
- **Block unlicensed operators**
  - a. Given the rapid increase in the importance of online gambling, the state must make additional efforts to block the accessibility of gambling with unlicensed (illegal) online operators.
  
- **Reduce or ban the marketing of gambling through sports**
  - a. Given the increasingly intensive integration of the gambling industry with the sports industry,

it is necessary to more strictly regulate (or completely disable) sponsorships of sports clubs and athletes by the gambling industry. Betting tends to become a normative behavior not only in the context of following sports, but also when playing sports, creating additional risks for children and young adults.

- **Improve the treatment and support options for children and young adults**
  - a. Young people with gambling problems, especially if they are minors, are often an invisible group, in the context of gambling as a hidden addiction. Consequently, there is a lack of specific interventions for this age group in Croatia associated with insufficient diagnostics and triage of problems related to gambling in minors.

**PORTUGAL:**

- **Improve Supervision and Law Enforcement**
  - a) Increase surveillance of illegal operators and unlicensed platforms.
  - b) Improve the application of sanctions to entities that do not comply with the rules, especially regarding advertising and the protection of minors.
- **Improve Access to Data and Transparency**
  - a. Publishing more detailed and accessible data on the impact of gambling on society.
  - b. Encouraging independent studies on the social and economic effects of gambling.
- **Improve Self-Exclusion Policies**

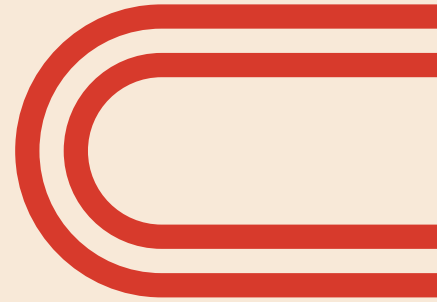
- a. Better promoting self-exclusion mechanisms so that more players are aware of the option.
- b. Better integration between physical and online operators to ensure that self-exclusion is effective on all platforms.
- **Stricter Advertising Rules**
  - a. Stricter restrictions on gambling advertising, especially at times and in media accessible to minors, especially online.
  - b. A ban on aggressive marketing strategies that encourage risky behavior.
- **Strengthen Education and Prevention Programs**
  - a. Introduction of education programs on responsible gambling in schools and among the general population.
  - b. Raising awareness about the risks of gambling and ways to prevent it.
- **Expand Access to Treatment and Support**
  - a. Greater investment in public psychological support services for problem gamblers.
  - b. Partnerships with private organizations and associations to expand treatment and support options.

**SPAIN:**

- **Strengthen Oversight and Law Enforcement**
  - a. Increase surveillance of illegal operators and unlicensed platforms.
  - b. Improve the application of sanctions to entities that do not follow the rules, especially in relation to advertising, the protection of

minors (as the statistics show, they continue to engage in gambling despite being prohibited) and the location of face-to-face premises (some very close to schools).

- **Improve Data Access and Transparency**
  - a. Publish more detailed and accessible data on the impact of gambling on society.
  - b. Encourage independent studies on the social and economic effects of gambling. As mentioned before, the last report from the Directorate General for the Regulation of Gambling dates from 2017.
- **Improvement of Self-Exclusion Policies**
  - a. To better disseminate the mechanisms of self-exclusion so that more players are aware of this option.
  - b. Improve integration between face-to-face and online operators to ensure that self-exclusion is effective across all platforms.
- **Stricter Rules on Advertising**
  - a. Impose stricter restrictions on gambling advertising: the fact that social networks and tourist events allow gambling advertising represents a clear danger, especially for young people.
  - b. Prohibit aggressive marketing strategies that encourage risky behaviors.
- **Strengthen Education and Prevention Programs**
  - a. Introduce educational programs on responsible gambling in schools and among the general population. "What's at stake" is a good



practice that could be exported to other regions.

- b. Raise awareness about the risks of gambling and ways to prevent it.
  - c. To raise awareness of the enormous danger posed by the advertising of the game by youtubers and other famous figures, to generate a negative opinion towards these practices and discourage these people from participating, thus protecting their image.
- **Expand Access to Treatment and Support**
    - a. Increase investment in public psychological support services for problem gamblers.
    - b. Establish partnerships with private organizations and associations to expand treatment and support options.
    - c. Provide different professionals with specific skills in prevention and intervention in gambling.

#### **ROMANIA:**

- **Treatment and support for problem gamblers**
  - a. In order to create support and therapeutic solutions for those with gambling addiction problems – there is an urgent need to finance treatments in private centers, which are currently the only ones that can offer services dedicated to gambling addicts, but also to create in parallel a therapeutic chain in the public system that includes mental health centers dedicated to addictions and public

funding for the training of specialists who can work in these centers.

- **Marketing restrictions**

- a. The prohibition of advertising of any kind (online, television, outdoor) on gambling outside the 1-5 hours at night has proven to be a very good measure in Spain. Other European countries such as Belgium, Bulgaria or Italy have also adopted policies in recent years to minimize the promotional activities allowed in the field of gambling.
- b. The prohibition of promotions and bonuses of any kind for both existing and new customers.

- **Reducing the accessibility of gaming machines**


- a. Banning the placement of gaming machines in small localities was a first step towards reducing accessibility to these extremely harmful forms of gambling. Moving these machines out of cities and grouping them in a small number of casinos is the next step in cleaning up the public space and reducing the damage caused by gambling.

- **Improve Data Access and Transparency**

- a. Increase data collection on the phenomenon of problem gambling and create transparency regarding the consumption of gambling services.

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