

**The Swedish Gambling
Authority's situation report
– online gambling outside the
licensed market**

April 2025

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Summary

The Swedish Gambling Authority finds that there is an extensive offering of unlicensed online gambling and that it is relatively easily accessible to players seeking this type of gambling. In previous reports, the Swedish Gambling Authority estimated that the channelling rate for competitive gambling within the licensed market was 86 per cent in 2023.¹

The Swedish Gambling Authority finds that, in this context, it is a relatively small group of the total player population that demands unlicensed gambling. Given the nature of this demand, it is not necessarily appropriate for all such gambling to be channelled to the licensed market. For protection purposes, this may apply in particular to unlicensed gambling consumed by people who have gambling problems and/or have opted for exclusion in the national self-exclusion register Spelpaus.se, as well as other categories of players who are at particularly serious risk from unlicensed gambling, such as minors and young people. Nor is it desirable, for obvious reasons, to channel cash flows that are criminal in nature or border on criminality into the licensed market.

The Swedish Gambling Authority has developed methods for identifying unlicensed gambling sites where Swedes gamble. The assessment is that the Authority currently has a good overview of the gambling sites where such gambling takes place. However, the Authority cannot take action against all such unlicensed gambling sites, as the so-called targeting criterion in the Gambling Act (2018:1138) must be met for the gambling to be considered illegal. This means that the gambling site must be marketed to Sweden or designed for the Swedish market. A high proportion of the gambling that currently takes place from Sweden on the unlicensed market is therefore not considered illegal under the Gambling Act. The Government has therefore appointed a letter investigator (an inquiry (HR2025/00344)) to review the Gambling Act's scope of application. This inquiry is to report by 17 September 2025 at the latest.

The exchange of experiences and information between gambling authorities in other countries is an important element in the work to combat illegal gambling.

¹Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*.

All countries face challenges in relation to online gambling that takes place outside their own licensed market and challenges in measuring the proportion of such gambling.

Gambling regulations and their scope of application vary between countries. The Swedish Gambling Authority finds that countries that only have a two-tier market, compared to Sweden, which has a *de facto* three-tier market (one licensed, one unlicensed legal and one unlicensed illegal), can work more effectively to channel online gambling to the licensed market. Such regulation is not only important for clarity in the scope of application itself, but also for other regulation aimed at limiting the supply, availability and demand for unlicensed online gambling. These countries also have solutions that are currently lacking in Sweden, such as DNS blocking of illegal gambling sites, payment blocking and collaboration with third parties (e.g. search engines, hosting service providers). Some countries have also criminalised participation in illegal gambling. However, it is difficult to assess how effective such measures actually are, as in many cases they have not been evaluated. The Swedish Gambling Authority's general view is that there are no universal solutions. Instead, it is important to combine different measures related to both supply and demand to increase channelling.

Despite the problems with the current scope of application, the Swedish Gambling Authority finds that the Authority's interventions, where possible, are important and effective. It is therefore important not to lose momentum in the ongoing work, even if changes to key elements of the regulations are being investigated.

In order for Swedish gambling regulation to be more effective in limiting the supply, availability and demand for unlicensed online gambling, the Authority sees certain issues as particularly urgent.

The Swedish Gambling Authority recommends the following:

- **The Government should urgently prepare the proposals put forward by the appointed research officer in their forthcoming report on the**

Gambling Act's scope of application and the consequential amendments that such a change would entail.

- **The Government Offices of Sweden should continue to actively monitor developments regarding preliminary rulings in the Court of Justice of the European Union (CJEU) and, where necessary, intervene in such cases based on the importance of safeguarding Swedish interests regarding how EU regulations should be applied.**

The Swedish Gambling Authority intends to carry out the following:

- **Depending on the outcome of the inquiry into the Gambling Act's scope of application, submit any necessary proposals for legislative amendments that could give the Authority additional tools in its work to combat illegal gambling.**
- **Within the framework of current regulations, develop its methods for investigating cases of illegal gambling.**
- **Develop information and communication regarding the content of the Authority's decisions on prohibiting illegal gambling to relevant actors, such as payment service providers.**
- **Continue to monitor the development of skin betting and lottery-like elements in computer games (e.g. loot boxes) and take action against operators that provide or promote such illegal activities, and disseminate this knowledge to other authorities.**
- **Continue to develop the method for calculating the channelling rate by annually updating, quality assuring and publishing the measurements.**
- **Monitor developments regarding payment solutions for unlicensed gambling and disseminate this knowledge in collaboration with the Swedish Financial Supervisory Authority, law enforcement authorities and the Swedish Tax Agency.**

- **Through various analytical methods, continue to expand the Authority's knowledge of the underlying factors driving demand for unlicensed gambling.**
- **Continue with targeted information campaigns aimed at young players and other target groups, including the broad group that currently lacks sufficient knowledge about the Swedish licence and the risks of unlicensed gambling. With this in mind, the Swedish Gambling Authority also intends to review how licence holders make it clear that their operations are licensed in Sweden.**
- **In 2025, further develop Spelpaus.se in terms of both different self-exclusion periods and how the information on Spelpaus.se is formulated so that people with gambling problems can come into contact with other actors who can offer the necessary support.**
- **In collaboration with other authorities and other actors, contribute knowledge about the target groups that play outside the licensing system and the risks this entails. Where such demand is based on criminal activity, such as tax evasion or money laundering, continue to collaborate with the Swedish Tax Agency and law enforcement authorities.**
- **Develop methods, particularly technical methods, to detect the marketing of illegal gambling. This is because various forms of marketing attract or steer Swedish players to gambling alternatives outside the licensed market.**
- **Continue to monitor developments in how gambling is marketed and share this knowledge in collaboration with, among others, the Swedish Consumer Agency, law enforcement authorities and gambling authorities in other countries.**
- **Continue to be an active participant in existing international multilateral partnerships (GREF and IAGR) with the aim of gathering relevant knowledge to develop the Swedish gambling market. In addition, work for coordinated and/or joint measures to influence various relevant actors (e.g. submissions to social forums).**

- **To the extent possible, work to ensure that issues related to illegal gambling are addressed in the EU's intensified anti-money laundering efforts and the Council of Europe's work to combat match fixing.**

1 Starting points

This section begins by setting out some key starting points that are important for a basic understanding of the work to combat online gambling outside the licensed market and why such work is important, but complex.

1.1 It is important that Swedes gamble within the licensed market

All gambling for money involves risks. Gambling for money should therefore be provided in a healthy and safe manner under public control. An important starting point for Swedish gambling regulation is that unlicensed operators should be excluded of the gambling market. This makes it possible to channel gambling to offers from responsible, reliable and controllable operators, which is a prerequisite for achieving strong consumer protection for Swedish players.²

Licence holders in Sweden must meet high standards for gambling operations, and ensure that social and health considerations are taken into account to protect players from excessive gambling and help them reduce their gambling when there is reason to do so (duty of care). The exclusion of unlicensed gambling companies also helps to protect licence holders from unfair competition. A given starting point for excluding unlicensed gambling from the Swedish gambling market is that the relevant authorities and other market players actively take measures to this end.³

The risk of money laundering in the licensed gambling market is high.⁴ This risk is considered to be even higher in the unlicensed market, where activities are generally conducted with little or no supervision.⁵ There is therefore a risk that serious organised crime in Sweden is exploiting unlicensed gambling activities to launder criminally acquired funds. Although this is conceivable, the Swedish Gambling Authority has no evidence that organised crime is operating or owns

² Government bill 2017/18:220, pp. 82, 85, 90 and 91.

³ Government bill 2021/22:242 p. 30 f.

⁴ Coordinating Function for Measures to Combat Money Laundering and Terrorist Financing, *Nationell riskbedömning av penningtvätt och finansiering av terrorism i Sverige (2020/2021)*, p. 6.

⁵ Swedish Gambling Authority, *Slutredovisning av uppdrag om att se över hur samarbetet för att bekämpa olaglig spelverksamhet kan stärkas*, p. 4.

online gambling activities targeting Sweden. Instead, such activities are believed to be carried out by financial technology (fintech) companies abroad that see an opportunity to make money quickly and easily with relatively low operating costs.

1.2 Not all unlicensed online gambling is illegal in Sweden

It is important to distinguish between unlicensed gambling and illegal gambling. For online gambling to be considered illegal under the Gambling Act, the unlicensed activity must be targeted at the Swedish market.

According to the legislative history of the Gambling Act, the fact that the gambling site through which the gambling is provided is accessible from Sweden, i.e. that the gambling site accepts Swedish players, is not sufficient for the targeting criterion to be considered met. The website must also be designed for the Swedish market. Whether the targeting criterion is met is determined by an overall assessment, where relevant circumstances may include whether the gambling site contains Swedish text or offers deposits and winnings in Swedish currency.⁶ Assessment of whether the targeting criterion is met in an individual case is often complex. The assessment must be made by the Swedish Gambling Authority and gambling companies, but in some cases also by actors who lack specialist knowledge of the gambling industry, such as the police and prosecutors, as well as actors covered by the provisions on the ban on promotion (Chapter 19, Section 2 of the Gambling Act) and the requirement to block card payments (Chapter 13, Section 1 of the Gambling Ordinance 2018:1475).

The Swedish Gambling Authority estimates that approximately two-thirds of gambling by Swedes on the unlicensed market takes place on gambling sites that, according to the Gambling Act, do not target Sweden.

On 19 January 2025, the Ministry of Finance commissioned a research officer to analyse and give an opinion on how the scope of the Gambling Act can be clarified and expanded, for example by changing the targeting criterion (HR2025/00355). The report is to be submitted to the Government Offices of

⁶ Government bill 2017/18:220, pp. 290.

Sweden on 17 September 2025. The purpose of the assignment is to exclude unlicensed gambling in a simpler and more effective way than is possible under current regulations.

1.3 A cross-border product with specific regulatory challenges for gambling authorities in all countries

For many years, the gambling sector in Sweden and around the world has been characterised by a high degree of digitalisation and technological innovation. The majority of gambling in Sweden and internationally now takes place online. There are many unlicensed gambling sites online that have no direct or visible connection to Sweden. These gambling sites are often administered from other countries within and outside the EU/EEA. Gambling sites that state that they operate under a licence from the gambling authority in Curaçao are particularly common. Even though they do not have a licence in Sweden, many companies accept Swedish players as customers.

In the absence of actual international regulation in the gambling sector, including at the EU level, the cross-border nature of online gambling services poses particular challenges. Related areas, such as the regulation of payment transfers, are regulated at the EU level through harmonised regulations, which contributes to increased complexity and conflicts of objectives between the principles of free movement of services and capital and the Member States' need to protect their national regulations and consumers. At the global level, the option of making transactions in cryptocurrency on unlicensed gambling sites is a natural part of the offering.

Based on meetings and cooperation with gambling authorities in other jurisdictions within and outside the EU, it is clear that Sweden is not alone in facing challenges in limiting unlicensed gambling or measuring the extent of such gambling. International exchanges of experience and information between authorities in different countries are therefore important for the Swedish Gambling Authority.

2 Incidence and availability of online gambling outside the licensed market

The Swedish Gambling Authority currently has a good overview of which unlicensed gambling sites Swedes gamble on, what kind of gambling is offered, and how accessible these gambling alternatives are in practice for Swedish players.

These gambling sites that offer betting and commercial online gambling are backed by gambling companies that are licensed in another EU country, licensed in a third country, or are completely unlicensed. However, the current wording of the Gambling Act prevents the Swedish Gambling Authority from intervening against such unlicensed gambling sites where Swedes play, unless the targeting criterion set out in the Gambling Act is met (see section 1.2).

In autumn 2024, the Swedish Gambling Authority reported a measure of the channelling rate for 2023. The Swedish Gambling Authority's assessment was that the public sector had control over the gambling market and that the channelling rate was 86 per cent. However, the channelling rate for commercial online gambling was estimated to be lower than for other forms of gambling.

In this chapter, the Swedish Gambling Authority wishes to highlight the following:

- The Authority's work to calculate the channelling rate, and why such calculations are important.
- The Authority's methods for identifying unlicensed gambling sites.
- The nature, extent and availability of unlicensed gambling.
- The availability of unlicensed gambling based on payment flows.
- The availability of gambling software on unlicensed gambling sites.
- The Swedish Gambling Authority's opportunities and difficulties in taking action against unlicensed operators.

2.1 The channelling rate was 86 per cent in 2023 – but the measure is subject to debate

One of the objectives of gambling policy is to ensure a sound and safe gambling market under public control. In Sweden, as in other countries, the question of whether the public sector has control over the gambling market is obviously a key issue. In Sweden, the issue is also the subject of discussions and debates initiated mainly by industry representatives.⁷ Such discussions often use different calculations of what is known as the channelling rate. In addition to the assessments made by the Swedish Gambling Authority below, several different measures developed by various private actors feature in the debate.

There is no established definition of the term channelling rate, but in Sweden it has been used as a measure of the proportion of gambling by Swedes on the competitive part of the gambling market that takes place within the licensing system.⁸

Due to factors such as the lack of complete information on cross-border payment transactions from players in Sweden directly, or via foreign accounts, to gambling sites outside the licensed market, it is not possible to calculate exactly how much money goes to gambling sites without a Swedish licence. Such calculations can only be based on incomplete information and qualified assumptions. However, government authorities and private actors are constantly developing their methods to be able to make as balanced assessments of the channelling rate as possible.

In the Authority's appropriation directions for 2024, the Swedish Gambling Authority was tasked with developing a method for calculating the channelling rate and proposing an indicator for reporting the channelling rate in the budget bill. The budget bill uses the indicator (channelling rate) to assess the results of public control over the gambling market.

When reporting on the assignment, the Swedish Gambling Authority used several methods: a survey of players, measurement of internet traffic, turnover

⁷ Macedo, "Europe's illegal gambling market: What's the solution?".

⁸ Swedish Agency for Public Management, *Utvärdering av omregleringen av spelmarknaden*.

data from gambling software permit holders, and data from the analysis company H2 Gambling Capital. The results showed that the channelling rate varies depending on the method and type of gambling, with betting generally having a higher channelling rate than online casinos/commercial online gambling. The Swedish Gambling Authority assessed the channelling rate for 2023 as 86 per cent.⁹

Illegal forms of gambling, such as pyramid schemes and skin betting, were not included in the measurement of channelling rate. However, in its regular activities, the Swedish Gambling Authority analyses skin betting as part of its analyses of the extent of unlicensed gambling in general and in its work to identify and take action against unlicensed gambling sites targeting Sweden.

The Swedish Gambling Authority estimates that the majority of gambling outside the licensed market takes place on gambling sites that do not target Sweden. For example, the Authority's measurements of internet traffic show that only 6 per cent of traffic to unlicensed gambling sites from Sweden in 2024 went to gambling sites that the Swedish Gambling Authority had issued an injunction against. In this context, however, it should be noted that gambling sites may be illegal even if the Swedish Gambling Authority has not issued an injunction against them, as the prohibition on providing gambling without the required licence follows directly from the law, and the proportion may therefore be higher than 6 per cent.

Continued development of channelling rate measurement and the implementation of new measurements are important for assessing the achievement of objectives in this area. The Swedish Gambling Authority will report the channelling rate for 2024 in the second quarter of 2025. The Authority also intends to initiate and actively participate in the exchange of experiences on this issue with gambling authorities in other countries.

2.2 There are countless gambling sites online

There is a wide variety of options available for anyone who wants to gamble online outside the licensing system. For example, the company Vixio Gambling

⁹ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*.

Compliance has a database of more than 100,000 gambling sites that, in some jurisdiction, have been blocked or subject to a ban or similar intervention by the authorities.

There are also established comparison sites on the internet that are well known to players and continuously review gambling sites that offer betting and commercial online gambling. One such operator, well known to players, has reviewed 6,000 gambling sites on its website. Based on the site's search filter, almost a quarter of these (approximately 1,400) currently accept players from Sweden. The company behind the comparison site states that it has more than 80 full-time employees and additional part-time employees who, among other things, continuously scan the internet for new gambling sites and review them. The company's website also has forums where players from all over the world, including Sweden, share and discuss various issues related to online gambling and different gambling sites. The site also has a mechanism for handling complaints against gambling companies.

The wide range of online gambling sites is partly attributed to the ease of setting up a functioning online gambling operation and, in some jurisdictions, the ease of obtaining a licence for such an operation. According to information available, it is possible to purchase ready-made 'packages' for gambling operations, including software, compliance and licences, in Curaçao for USD 25,000.¹⁰

The wide range of sites available does not consist solely of sites operated by small operators; many unlicensed gambling sites are run by large operators with well-known brands. Some of these are highly visible to Swedes who follow international sports and other major events through sponsorship.

¹⁰ Martin Purbrick, Chairperson of the Council on Anti-Illegal Betting and Related Crime, International Federation of Horseracing Authorities (lecture, Council of Europe, Strasbourg, 14 November 2024).

2.3 The Swedish Gambling Authority has a good overview of the unlicensed gambling sites that Swedes gamble on

Since the re-regulation, the Swedish Gambling Authority has prioritised efforts to combat illegal gambling. In this work, the Authority has continuously developed its ability to identify unlicensed gambling sites that Swedes gamble on. The Swedish Gambling Authority believes that it currently has a good overview of where gambling outside the licensed market takes place and how accessible such gambling sites are to players in terms of factors such as deposits and withdrawals of money.

The Swedish Gambling Authority uses various methods to identify unlicensed online gambling sites. An important method for identifying relevant entities subject to supervision and prioritising efforts is ongoing estimates of internet traffic. However, it is important to mention that estimating internet traffic is a relatively new method for the Swedish Gambling Authority and other gambling authorities. The method is therefore still under development. Moreover, such estimates do not provide a complete picture of Swedes' gambling outside the licensing system. The Swedish Gambling Authority therefore supplements its analysis with other methods and sources. These include reviewing tips submitted to the Swedish Gambling Authority about alleged illegal gambling sites, actively monitoring relevant discussion forums and social media, web scraping, keyword analysis using SEO optimisation tools¹¹ and information from other authorities in Sweden and abroad.

In early 2025, the Swedish Gambling Authority monitored internet traffic from Sweden to approximately 1,100 gambling sites belonging to over 325 gambling companies that do not have a licence in Sweden. The Swedish Gambling Authority has already assessed that more than 60 of these gambling companies target Sweden, which has resulted in the Swedish Gambling Authority deciding to ban these companies. The Swedish Gambling Authority has opened supervisory cases against just over 50 additional companies, but has closed the cases without taking any action because the companies were not deemed to be

¹¹ Search engine optimisation (SEO) is the process of improving a website's visibility in search engines by using relevant keywords and strategies. One of its functions analyses search terms, which in this case aims to show information about the occurrence of websites among specific search terms. The Swedish Gambling Authority uses the digital marketing tool Semrush for SEO.

targeting Sweden. In relation to the approximately 1,100 gambling sites that the Swedish Gambling Authority actively monitors, the Authority's supervision has covered approximately 65 per cent of the total internet traffic to these sites, calculated based on traffic in 2024. The assessment is that the indications of illegal gambling against individual companies based on the targeting criterion are weak for the majority of the remaining internet traffic. However, the Swedish Gambling Authority is continuously opening new supervisory cases and making new decisions on bans. Since spring 2024, cases specifically concerning skin betting have been part of the Swedish Gambling Authority's supervision and are also reflected in the fact that the Authority currently has ten active bans against companies that provide skin betting.

The Swedish Gambling Authority has followed up on the effect of its ban decisions by comparing internet traffic to banned gambling sites before and after a ban. Of the companies banned in 2023 and 2024, traffic from Sweden to the companies' gambling sites has decreased by an average of approximately 40 per cent. However, the results should be interpreted with some caution, as the Swedish Gambling Authority has a relatively limited data set. Nevertheless, the results support the claim that the Swedish Gambling Authority's ban decisions are important and have a guiding effect, not least for related sectors such as gambling software providers and payment intermediaries. The bans are particularly important in this context, as there are interpretation issues regarding the scope of the Gambling Act and the difference between unlicensed and illegal gambling.

It is also common for gambling companies that the Swedish Gambling Authority has contacted in a supervisory case to choose to geoblock Swedish IP-addresses from accessing their gambling site, as early as in the communication phase, or in close connection with a decision to impose a ban. In such cases, the Swedish Gambling Authority closes the supervisory case or revokes the ban on the grounds that the company can no longer be considered to be targeting Sweden.

2.4 Which gambling sites without a Swedish licence do Swedes gamble on?

Unlicensed gambling sites offering betting or commercial online gambling that Swedes gamble on can be divided into three different categories based on where the gambling company behind the gambling site has its licence. The gambling companies behind the gambling sites may be licensed in another EU Member State, licensed in a country outside the EU (third country), or have no licence at all. In the unlicensed market, there are relatively few sites that only offer betting. However, it is common for betting to be offered alongside commercial online gambling.

Over the years, the Swedish Gambling Authority has noted that certain unlicensed gambling companies, which the Swedish Gambling Authority has found have a significant number of Swedish players, regularly change their country of licence. There are also cases where such gambling companies conduct essentially the same business under several different company names/companies and licences.

In addition to gambling sites offering betting and commercial online gambling, the Swedish Gambling Authority has increasingly had to include websites offering skin betting in its work to combat illegal gambling. The Authority finds that certain activities of this type are to be regarded as gambling for money.¹² The Swedish Gambling Authority estimates that internet traffic from Sweden to unlicensed gambling sites offering skin betting accounted for 49 and 41 per cent of the total internet traffic to unlicensed gambling sites in 2023 and 2024, respectively.

2.4.1 Gambling companies licensed in another EU Member State

A significant proportion of Swedish gamblers choose to gamble with operators licensed in another EU Member State. Studies conducted by the Swedish Gambling Authority show that approximately 13 per cent of internet traffic to unlicensed gambling sites in 2024 went to companies with such a licence. The

¹² Swedish Gambling Authority, 'Skinbetting, skin-gambling'.

majority of the traffic went to gambling sites licensed in Malta, but also to gambling sites provided by gambling companies licensed in Cyprus and Estonia.

Discussions on various gambling forums clearly show that companies with an EU gambling licence, particularly those in Malta, are considered safer for players than, for example, gambling companies outside the EU/EEA. In this context, safer means that players seem to experience greater security in the gambling itself, i.e. that it is not manipulated and that the chances of winning are greater compared to gambling sites operated by companies licensed in third countries.

However, the Swedish Gambling Authority finds that consumer protection on these gambling sites is generally significantly weaker than in the Swedish licensed market. For example, the Swedish Gambling Authority has not observed anything comparable to the Swedish duty of care in this category of gambling sites. The existence and extent of bonuses are also greater than what is permitted in Sweden. So-called cashbacks and VIP programmes are also common.

Gambling companies licensed in other EU countries often take advantage of the free movement of payment services within the EU by offering deposits and withdrawals through the Single Euro Payments Area (SEPA), which makes it as quick and easy to send money from a Swedish bank to a European bank as between two Swedish banks. In addition, there are various forms of digital wallets established within the EU and, in some cases, pure instant banking solutions comparable to those available in the Swedish licensed market, which means that deposits in particular can be made in real time. This can be problematic in that consumers may find it difficult to distinguish between licensed and unlicensed gambling sites, given that the same or similar payment solutions are offered (for more on payment solutions, see section 2.5).

Companies licensed in other EU countries generally market themselves in English, and their gambling sites usually lack other clear indications that they are targeting Swedish players (i.e. they do not contain information in Swedish, allow deposits and withdrawals in Swedish currency or offer targeted offers to Swedish players). Overall, they appear to operate in a grey area that makes it

difficult for the Swedish Gambling Authority to claim that their activities target Sweden as set out in the Gambling Act.

2.4.2 Operators licensed in third countries

Gambling companies licensed in third countries¹³, such as Curaçao and Anjouan, pose a significant challenge in the fight to combat illegal gambling. In 2024, approximately 45 per cent of all traffic to unlicensed gambling sites went to sites that stated that the gambling company behind the site was licensed in a third country. Of the total traffic to unlicensed gambling sites, Curaçao accounted for 38 per cent, while Anjouan accounted for 5 per cent.

The Swedish Gambling Authority finds that these jurisdictions have very low requirements for supervision and consumer protection, and operate under minimal regulations compared to those in Sweden. Gambling companies licensed in these jurisdictions pose a significant risk to Swedish players, as they often lack any measures for responsible gambling.

It is much more common for gambling companies licensed in third countries to explicitly target the Swedish market through marketing or gambling sites in Swedish. The gambling sites often have a relatively wide range of gambling products and generous bonuses, which can attract Swedish players. The vast majority of the Swedish Gambling Authority's injunctions apply to this category of gambling company.

The Swedish Gambling Authority has also noted that some of the gambling companies in this category administer their payments via payment agents in Cyprus, i.e. within the EU. In a review conducted by the Authority in December 2024, approximately half of the companies whose gambling sites are monitored by the Swedish Gambling Authority had traffic to a payment agent within the EU for the purpose of handling payments. In 99 per cent of cases, the payment agent was registered in Cyprus. By using a payment agent within the EU, such gambling companies gain access to the payment systems available within the

¹³ 'Third countries' are traditionally considered to be countries outside the EU/EEA. The United Kingdom has not been considered a third country in this context, even though it should formally be considered a third country following its withdrawal from the EU in 2021.

EU, which can create a facade of operating within more regulated structures. However, payments are often masked as other types of transactions, such as e-commerce, to prevent banks or supervisory authorities from identifying the transactions as gambling-related.

According to information available to the Swedish Gambling Authority, Curaçao offers a type of licence that covers all forms of online gambling, making it easy for gambling companies to offer several different gambling services under the same licence.

Anjouan offers even lower requirements and a fast licensing process, which is attractive to smaller operators and start-ups that want to avoid stricter rules in other jurisdictions.

The Swedish Gambling Authority has indications that a small number of Swedish players are betting large sums in the Asian market. Gambling in the Asian market is mostly unregulated and takes place through special agents who place bets on behalf of the player, which means that such gambling is difficult to detect. In an international context, specific risks are often mentioned regarding the Asian market's links to match fixing.¹⁴ Gambling on the Asian market is something that the Swedish Gambling Authority finds difficult to identify through, for example, internet traffic and forum monitoring, as it does not generate volumes of such traffic or is not openly discussed by players on forums.

For the Swedish Gambling Authority and supervisory authorities in other comparable countries, gambling companies operating from third countries pose a particular challenge. Licences in these jurisdictions are often summarily regulated, and access to legal assistance for Swedish authorities, for example to impose fines, is practically non-existent.

2.4.3 Operators without a licence in any jurisdiction

There are also online gambling sites operated by gambling companies that do not have a licence in any jurisdiction, i.e. they operate outside any form of

¹⁴ Sportradar, 'Asian betting' (presentation, Sportradar, London, October 2023).

regulation and supervision. These operators often market their services aggressively through social media and independent affiliates, which poses particularly serious risks to Swedish consumers.

Such gambling sites are sometimes designed to attract Swedish players by offering Swedish language options and the possibility to play with Swedish kronor (SEK).

As these operators are not licensed, they are not subject to any requirements from a gambling authority or similar body to comply with regulations on responsible gambling, personal data protection or safe gambling. This entails a high risk for players, who may lose both their deposited funds and any winnings without any real possibility of legal redress. In addition, payment methods such as cryptocurrencies or anonymised transactions are often used, which poses particular challenges in efforts to intervene against their activities.

In contacts with other gambling authorities, it has emerged that such operators often have flexible technical solutions that make it easy for them to avoid blocking and other measures that authorities in different jurisdictions may take, depending on the circumstances. For example, gambling sites are often accessible via several different domains and servers, which poses particular challenges for gambling and other supervisory authorities.

2.4.4 Gambling sites offering skin betting

Skins are virtual items that can be resold on various platforms for money. They can have different values depending on factors such as how rare they are to collectors. There are websites where so-called 'skin betting' or 'skin gambling' takes place. Here, skins are used as stakes and/or winnings in games that are decided by chance and can therefore be considered gambling for money. The Swedish Gambling Authority does not issue licences or permits for such activities, but investigates such gambling sites as part of its work to combat illegal gambling. This form of gambling is particularly popular among young people.

The Swedish Gambling Authority estimates that internet traffic from Sweden to unlicensed gambling sites offering skin betting accounted for 49 and 41 per cent of the total internet traffic to unlicensed gambling sites in 2023 and 2024, respectively. A few skin betting websites have very high internet traffic from Sweden. Of the ten most visited unlicensed gambling sites in 2024, six engaged in skin betting. In connection with supervision of unlicensed gambling sites operating traditional online casino activities that was conducted in autumn 2024, the Swedish Gambling Authority noted that some of these sites allowed deposits with skins even though the sites did not market themselves as skin betting sites.

The companies that operate such websites where, according to the Swedish Gambling Authority, gambling for money takes place through skin betting, generally do not have a gambling licence in any jurisdiction. The companies that run these sites are based both inside and outside the EU. The Swedish Gambling Authority has noticed that these sites rarely have proper age checks, which means that minors might be gambling for money by means of skin betting, which is a really serious issue.

The Swedish Gambling Authority already has a developed exchange of experiences in skin betting in place with other authorities, including the Public Health Agency of Sweden and the Swedish Agency for the Media.

2.5 The ability to deposit and withdraw money from unlicensed gambling sites – a crucial issue for accessibility

The ability of players to deposit money on unlicensed gambling sites and have their winnings paid out is a crucial factor in assessing the accessibility of unlicensed gambling. According to survey data from November 2024, the risk of not receiving winnings is the most significant reason why players avoid gambling sites without a Swedish licence.¹⁵ The Swedish Gambling Authority's monitoring of internet forums also shows that players are particularly interested in effective, secure and familiar instant banking solutions that allow identification via BankID. Instant banking solutions are also emphasised in affiliate marketing. Players often state in forums that they try to avoid gambling

¹⁵ Swedish Gambling Authority, *Allmänheten om spel 2024*, p. 55.

sites with inflexible withdrawals and high exchange fees.¹⁶ Generally speaking, many Swedish players on unlicensed sites seem to want to use the same payment services as on the licensed market, although there are exceptions, such as those who want to make deposits with cryptocurrency.¹⁷

In spring 2024, the Swedish Gambling Authority conducted a survey of the payment methods that Swedish players can use for deposits and withdrawals to the unlicensed market. The survey was part of the background material for reporting on a government assignment (Fi2024/01052) to review how cooperation with the Swedish Financial Supervisory Authority can be strengthened to combat illegal gambling on the Swedish gambling market. The assessment is that, generally speaking, the same types of payment methods remain in use today and, in some cases, have been further developed. A number of supervisory cases handled during the autumn of 2024 confirm this picture.

It is clear that there are currently many different ways for a Swedish player to deposit and withdraw money from an unlicensed gambling company. Rapid technological developments have led to a number of new payment channels and services being provided by both new and established operators. This has developed in parallel with the gradual liberalisation of the payment market within the EU.

It is not possible to analyse in detail the various EU legal acts related to payments within the scope of this report. However, the Swedish Gambling Authority finds that developments within the EU mean that payments to and from unlicensed gambling companies are and will continue to be relatively simple in the future. An additional challenge is that unlicensed gambling sites often have several independent payment solutions at their disposal.

Payment solutions

¹⁶ Unlicensed websites generally do not offer SEK as a currency.

¹⁷ Swedish Gambling Authority, *Slutredovisning av uppdrag om att se över hur samarbetet för att bekämpa olaglig spelverksamhet kan stärkas*, p. 22.

For card payments, Visa and Mastercard are generally accepted on all unlicensed gambling sites investigated by the Swedish Gambling Authority. Other payment services commonly used alongside card payments are as follows.

E-wallets

E-wallets play a central role in the unlicensed gambling market by enabling fast transfers (in principle in real time) and greater anonymity. The initial transfer when using e-wallets does not take place between the player and the gambling site, but between the player and the e-wallet. The money is then transferred to the gambling site by the player from the e-wallet. Some e-wallets support cryptocurrencies, such as Bitcoin and Ethereum, which provides an additional layer of anonymity and accessibility for the player. Some e-wallets also offer the holder the option of having a payment card issued by the e-wallet company, including virtual single-use cards. Most of the e-wallets noted by the Swedish Gambling Authority are not supervised by the Swedish Financial Supervisory Authority.

Neobanks

Neobanks is a collective term for companies that provide digital banking services without traditional bank branches. These can be companies with banking licences, payment service providers or e-money institutions of various kinds. Like traditional banks, neobanks are also required to hold a licence in Sweden. However, Swedish consumers can also become customers of foreign neobanks. Under certain conditions, foreign neobanks may operate in the Swedish market without a licence from the Swedish Financial Supervisory Authority. A basic requirement is that the company has an operating licence issued by the competent authority in the country in which the company is based. In such cases, the foreign neobank is not subject to direct supervision by the Swedish Financial Supervisory Authority, but is supervised by the relevant licensing authority in the country in which the company has its head office.

There are a large number of neobanks in the EU and the rest of the world that accept Swedish citizens as customers. In its national risk assessment for 2023/2024, the national Coordinating Function for Measures to Combat Money Laundering and Terrorist Financing assessed that the threats and vulnerabilities

related to neobanks are high and significant. The assessments are based on a number of identified threats and vulnerabilities, such as:

- the large number of parties and jurisdictions involved in transactions,
- difficulties in tracing transactions, lack of physical meetings in connection with the verification and customer identification process,
- the possibility of concealing the actual account holder, sender and recipient through, among other things, the use of account proxies.¹⁸

Cryptocurrencies

Cryptocurrencies are commonly found on unlicensed gambling sites. Withdrawals and deposits are offered in the most well-known cryptocurrencies, including Bitcoin, Litecoin and Ethereum. The Swedish Gambling Authority has also noted skin betting sites where cryptocurrency is essentially the only means of payment. At present, it is not possible for gambling companies licensed in Sweden to offer gambling with cryptocurrency. A special form of gambling in which customers can pay with cryptocurrency is known as decentralised casinos. A decentralised casino is an online casino game based on decentralised technology, usually a blockchain. The technology allows players to play casino games with cryptocurrencies without having to rely on a third party, such as a bank or a traditional payment service. The EU's Markets in Crypto-Assets regulation, the MiCA regulation, came into force in 2024.

Account-to-account payment solutions

Account-to-account payment solutions (also known as instant banking) are usually verified using Swedish electronic identification, primarily BankID. The Swedish Gambling Authority finds that certain gambling companies licensed in Estonia and Malta, but not in Sweden, have from time to time had access to various payment solutions of this type for several years. The Swedish Gambling Authority judges that gambling sites that have been able to offer such solutions have been particularly popular among Swedish players. On 6 July 2023, the Swedish Gambling Authority took action against a Swedish payment service provider that offered such a service to unlicensed gambling companies by

¹⁸ Coordinating Function for Measures to Combat Money Laundering and Terrorist Financing. *Nationell riskbedömning 2023/2024 – Neobanker.*

issuing a ban on promotion coupled with a fine. However, the ban was lifted by a ruling of the Administrative Court of Appeal on 7 February 2025 (KR 1859-24).

SEPA payments

SEPA (Single Euro Payments Area) payments are a system designed to facilitate cross-border payments in euros. The aim of SEPA is to make payments within the EU simpler, faster and cheaper. In practice, this means that you can make a payment or transfer in euros in the same way as a domestic payment, regardless of whether the recipient is in the same country or another country within the EU. Regular SEPA payments can take up to one working day. There is also a service called SEPA Instant Payments, which allows payments to be made in seconds, 24 hours a day, seven days a week. SEPA Instant Payments are expected to expand in the future. The Swedish Gambling Authority's assessment is that SEPA payments are mainly used for withdrawals to Swedish bank accounts from unlicensed gambling sites.

Card payments

For card payments, payment service providers subject to the Payment Services Act (2010:751) pursuant to the Gambling Ordinance shall reject payment orders where payment cards are used and the payment is approved through the use of the retail code for gambling, Merchant Category Code (MCC) 7995¹⁹. However, this does not apply if the payment order relates to an activity that is licensed or where such a licence is not required under the Gambling Act, i.e. is not illegal under the current targeting criterion in the Gambling Act.

However, the Swedish Gambling Authority has found that some unlicensed gambling companies use incorrect MCC codes to circumvent such payment blocks. For example, for card payments it may appear that the card payer is purchasing beauty products instead of gambling services. This arrangement means that payment service providers cannot see that the card payments are for gambling and therefore cannot reject the transactions as specified in the Gambling Ordinance. The Swedish Gambling Authority has brought the practice of using incorrect MCC codes to the attention of the Swedish Financial

¹⁹ MCC code 7995 is used for gambling activities.

Supervisory Authority and has also raised the issue with gambling authorities in other countries.

The fact that some foreign e-wallets issue payment cards to Swedish consumers poses further challenges for blocking payments to unlicensed gambling sites, as the deposit is then made from a payment card issued abroad that is not covered by Swedish gambling regulation.

In general, the work of restricting and stopping payments is also made more difficult by the interpretation problems that exist between what is unlicensed and illegal gambling.

2.6 Certain issues related to the supply of gambling software

On 1 July 2023, a permit requirement for gambling software was introduced in Sweden. The purpose of the permit requirement is to reduce the supply of gambling on the illegal market, as permit holders are not permitted to supply their gambling software to operators without the necessary licence. A reduced supply of gambling software should make gambling sites without the necessary licence less attractive. Permit holders are not allowed to appear on websites that do not have the necessary licence.²⁰ At present, approximately 190 gambling software providers have a permit for gambling software on the Swedish gambling market.

The Swedish Gambling Authority finds that the reform has had a positive impact on reducing the attractiveness of the illegal segment of the unlicensed market in particular. However, there are challenges in that the Authority's follow-up and supervision have shown that compliance with the reform has not been satisfactory. Some of the problems are rooted in ambiguities regarding the scope of the Gambling Act with regard to the difference between unlicensed and illegal gambling, but cannot be explained by this alone.

The Authority has therefore implemented a number of measures to improve compliance, including preventive supervision in the form of an information

²⁰ The Swedish Gambling Authority's decision in case 24Si77. The decision has been appealed to the Administrative Court.

letter to all permit holders and supervision through inspections of a number of permit holders. Despite this, the Swedish Gambling Authority found that permit holders' gambling software was still being used by operators without the necessary licence. In January 2025, the Swedish Gambling Authority therefore called all permit holders to meetings to explain and discuss the implications of the prohibition on providing gambling software to operators who do not have the necessary licence and that the Authority may initiate strict supervision of permit holders who do not comply with the rules. One thing that emerged from the meetings is that permit holders feel that, in addition to ambiguities regarding the scope of application, there are other difficulties in interpreting the legislation. For example, the fact that several permit holders geoblock gambling software provided to unlicensed gambling companies was discussed. The Swedish Gambling Authority has assessed that geoblocking is not a sufficient measure, and the issue is currently being examined in court. In addition, it emerged that there are problems within the industry with piracy and breach of contract between parties.

It is important to note that even though the most popular games today are covered by gambling software permits, there is a significant proportion of operators providing gambling software who have chosen not to apply for a permit in Sweden. They are therefore only available on the illegal market. A small number of permit holders have also withdrawn their licences, stating that operating on the Swedish market has not been profitable enough.

2.7 The Swedish Gambling Authority cannot take action against all unlicensed gambling sites where Swedes gamble

As mentioned earlier (see section 1.2), there is a legal difference between unlicensed gambling and illegal gambling. For online gambling to be considered illegal, it is crucial that the unlicensed activity is targeted at the Swedish market. In supervisory matters, the Swedish Gambling Authority has the burden of proof that this is the case. Although it still occurs, it is not as common today for unlicensed gambling companies to use gambling sites in Swedish, Swedish currency or other similar obvious links to Sweden compared to what was the case shortly after re-regulation of the gambling market. However, many unlicensed gambling sites continue to accept Swedish players as customers.

In summary, the targeting criterion has proven difficult to apply in practice, which complicates efforts to combat illegal gambling. In other words, there is a grey area in the gambling market in terms of supply and availability. This grey area makes it difficult for the Swedish Gambling Authority to use other tools, including restricting or stopping payments. It also means that the permit requirement for gambling software does not contribute sufficiently to the objective of increased channelling.

The grey area is exploited by certain gambling companies that do not want to comply with the Gambling Act's requirements regarding, among other things, responsible gambling, which entails major risks for Swedish consumers and problems from a competition standpoint. The issue has been raised by the Swedish Gambling Authority in its report on a government assignment (Fi2024/01052) and also by the Swedish National Audit Office (RiR 2024:19).

As mentioned earlier (section 1.2), the Government has appointed an inquiry to, among other things:

- analyse and give an opinion on how the scope of the Gambling Act can be clarified and expanded, for example by changing the targeting criterion,
- take particular account of the fact that the proposal should help to curb payment flows between Swedish consumers and unlicensed gambling companies,
- give a special account of the effects that an expanded scope of application would have on gambling regulation and other legislation, and
- submit the necessary legislative proposals.

The report is to be submitted to the Government Offices of Sweden on 17 September 2025.

2.8 The Swedish Gambling Authority's assessment

The offering of online gambling outside the licensed market is extensive and relatively easily accessible to Swedish players. Whether online gambling is subject to licensing is determined by the Gambling Act's scope of application and the so-called targeting criterion. The problems highlighted regarding the application of the targeting criterion mean that, in practice, there is a three-tier market (a licensed, an unlicensed legal and an unlicensed illegal market). This is problematic and can be exploited by gambling companies that do not want to comply with the requirements of the Gambling Act, which may result in issues such as poorer consumer protection and distorted competition. The current scope of application also leads to uncertainty in the application and effectiveness of other regulations in the area, such as the permit requirement for gambling software and the possibility of restricting payment flows to gambling sites without a Swedish licence.

Notwithstanding the above problems, the Swedish Gambling Authority's work, within the current scope of application, has had an effect in limiting the supply of unlicensed gambling. The Authority's work should therefore be further developed. The Swedish Gambling Authority also intends to develop its methods for calculating the channelling rate on the Swedish gambling market.

The Swedish Gambling Authority welcomes the investigation into the Gambling Act's scope of application. A change in scope will hopefully lead to more effective work to combat illegal gambling. However, the Authority would like to emphasise that a change in scope is not in itself a universal solution to combating illegal gambling. Instead, it is crucial to have a broad range of tools to effectively combat illegal gambling.

The Swedish Gambling Authority recommends the following:

- **The Government should urgently prepare the forthcoming proposals put forward by the appointed letter investigator on the Gambling Act's scope of application and the consequential amendments that such a change would entail.**

The Swedish Gambling Authority intends to carry out the following:

- **Depending on the outcome of the inquiry into the Gambling Act's scope of application, submit any necessary proposals for legislative amendments that could give the Authority additional tools in its work to combat illegal gambling.**
- **Within the framework of current regulations, develop its methods for investigating cases of illegal gambling.**
- **Develop information and communication regarding the content of the Authority's decisions on prohibiting illegal gambling to relevant actors, such as payment service providers.**
- **Continue to monitor the development of skin betting and lottery-like elements in computer games (e.g. loot boxes) and take action against operators that provide or promote such illegal activities, and disseminate this knowledge to other authorities.**
- **Continue to develop the method for calculating the channelling rate by annually updating, quality assuring and publishing the measurements.**
- **Monitor developments regarding payment solutions for unlicensed gambling and disseminate this knowledge in collaboration with the Swedish Financial Supervisory Authority, law enforcement authorities and the Swedish Tax Agency.**

3 Why is there demand for gambling outside the licensed system?

In the previous chapter, the Swedish Gambling Authority presented its view on the supply and availability of unlicensed gambling. This chapter highlights the reasons why Swedish players demand unlicensed gambling and the groups within which such demand exists.²¹

3.1 Relatively few people are estimated to gamble outside the licensing system

In its report on the channelling rate, the Swedish Gambling Authority estimated that approximately 14 per cent of online gambling in 2023 took place outside the licensed market.²² This estimate referred to the proportion of Swedes' gambling on the competitive part of the gambling market that takes place within the licensing system. Thus, there is a clear demand in Sweden for the type of gambling offered on the unlicensed market.

However, the Swedish Gambling Authority's assessment is that, in this context, it is a relatively small group of the total gambling population that accounts for gambling outside the licensed market.²³ There are indications that some of these individuals gamble for relatively large amounts of money compared to the average player in the licensed market.

The Swedish Gambling Authority's assessment of the number of players who gamble on unlicensed gambling sites at any given time is based on fragmented knowledge. The Authority will therefore continue to develop its methods for

²¹ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 29.

²² The analysis is based on data from surveys regarding players and gambling, conducted by the Swedish Gambling Authority/Enkätfabriken and by external actors. All of the surveys are quantitative. There are no supplementary qualitative surveys in which players are asked why they gamble unlicensed, which means that the analysis cannot be considered complete. However, the Swedish Gambling Authority has observed discussions on social media and forums about unlicensed gambling and reviewed online marketing, which has been used to supplement the analysis. In short, there is a lot of uncertainty in the assumption.

²³ 3 per cent according to the Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 19. 6 per cent according to the Swedish Gambling Authority, *Allmänheten om spel 2024*, p. 51.

understanding the underlying factors that create demand for such gambling and the extent of this demand. Such knowledge is important, not least from a preventive perspective, such as the design of targeted information campaigns and other targeted measures aimed at specific target groups.

3.2 Why do people gamble outside the licensing system?

The Swedish Gambling Authority has identified a number of factors that cause Swedish players to gamble on unlicensed gambling sites. These factors can be divided into push and pull factors. Some factors arise because players no longer have the option of gambling on the licensed market. Other factors are those that exist outside the licensed market and, in this sense, attract or draw players to unlicensed gambling. In practice, it is of course likely that there is interplay between different factors, or that different factors are applicable to individual players to a greater or lesser extent.

In the Swedish Gambling Authority's assessment, some turnover outside the licensed market is driven by factors that are not directly related to gambling. This may, for example, involve individuals who want to convert assets in cryptocurrency into conventional currencies via gambling sites, which can then be transferred to bank accounts in Sweden, or it may involve pure money laundering.

The most prominent push factors are gambling companies imposing limits on unprofitable customers and self-exclusion in the national self-exclusion system, Spelpaus.se. Pull factors that attract or draw Swedish players to the unlicensed market include marketing (e.g. bonus offers and VIP programmes) and differences, in a broad sense, between the offerings available on the licensed market and the unlicensed market. Marketing and traffic steering may also be reasons why people unknowingly gamble on unlicensed gambling sites.

3.2.1 Some players are limited by gambling companies with a Swedish licence

According to the Swedish Gambling Authority's survey of the gambling habits of the Swedish population conducted in the summer of 2024, 13 per cent of those

who stated that they had gambled on unlicensed gambling sites said that they did so because companies with a Swedish licence had imposed limits on their gambling.²⁴ Imposing limits means that the size of the stakes in the game is limited by the gambling company. A limit on stakes can, of course, be a responsible gambling measure, but in this case it may instead be a situation where a player is considered unprofitable for the company due to the player's skill in relation to betting. The Swedish Gambling Authority finds that only one of the companies with a Swedish betting licence currently does not limit players for such reasons. The possibility of limiting is not regulated in gambling legislation, but rather in the terms and conditions of the gambling companies.

Persons subjected to a limit by a gambling company can seek out other gambling companies and gambling sites to continue gambling at the same level as before the limitation. The Swedish Gambling Authority finds that there are Swedish players who, in practice, have exhausted the gambling opportunities on the Swedish licensed market and therefore only have the unlicensed market to turn to. The number of such individuals is likely to be very small, but the extent of their gambling is likely to be substantial.

3.2.2 Self-exclusion in the national self-exclusion register, Spelpaus.se

At the turn of the year 2024/2025, just over 120,000 people were registered in the national self-exclusion register, Spelpaus.se. Self-exclusion means that the person cannot engage in gambling that requires registration with a licence holder in Sweden. The number of people excluded via Spelpaus.se has increased steadily since its inception in 2019. The Swedish Gambling Authority currently sees an increase of approximately 20,000 people per year. More men than women are self-excluding from gambling. According to several surveys, those who have self-excluded via Spelpaus.se represent a significant proportion of those who have gambled on gambling sites without a Swedish licence.²⁵

²⁴ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

²⁵ 25 per cent according to the Swedish Gambling Authority, *Spelvanor online 2023*, p. 35 and 11 per cent according to the Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

However, most of those who are excluded via Spelpaus.se do not gamble at all during their self-exclusion period.²⁶

It is obviously problematic that people who are excluded via Spelpaus.se gamble on the unlicensed market, especially if they have self-excluded due to gambling problems. Some people need more support than just self-exclusion. The Swedish Gambling Authority is working to make it easier for at-risk individuals to get further help and support. One example of such a measure is providing clear references to contact details of support organisations on Spelpaus.se.

Industry representatives have suggested that players who have registered for self-exclusion should be contacted by actors who can provide support, such as the Swedish gambling helpline Stödlinjen. This raises issues that fall outside the remit of the Swedish Gambling Authority. The proposal also raises complex questions about the most effective methods of providing support to people with gambling problems, as well as legal issues concerning personal privacy. The Swedish Gambling Authority will continue to disseminate available knowledge on gambling-related issues in collaboration with other authorities acting within the scope of their mandates in relation to gambling.

3.2.3 Demand triggered by bonus offers on the unlicensed market

Bonus offers are a central part of the marketing of unlicensed gambling sites. Several surveys conducted by the Swedish Gambling Authority show that bonus offers from unlicensed gambling sites are one of the main reasons why Swedish players gamble on such sites. In the Swedish Gambling Authority's survey from the summer of 2024, 19 per cent of those who stated that they had played on unlicensed gambling sites said that the reason was better bonus offers compared to the licensed market.²⁷

There is a wide range of websites that compare bonuses offered by different gambling companies, and much of the marketing surrounding unlicensed

²⁶ Swedish Gambling Authority, *Kunskap om och utveckling av självavstängningsregistret (Spelpaus.se)*, p. 11.

²⁷ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

gambling sites focuses on bonuses. Industry representatives also often cite the stricter Swedish bonus regulations that apply to the licensed market as a reason why players gamble outside the licensed system.

3.2.4 Demand triggered by an offering that is not available on the Swedish gambling market

In the Swedish Gambling Authority's survey conducted in the summer of 2024, 13 per cent of those who had gambled on unlicensed gambling sites stated that they had done so because of a different range of games compared to the licensed market.²⁸

It is difficult for the Swedish Gambling Authority to compare the range of games available on the licensed and unlicensed markets, as the range of different games is extensive. However, as in many industries, it is clear that certain games are more popular than others and are expected to be part of the standard offering of an online casino. The Swedish Gambling Authority is aware that there are certain games that are currently popular among Swedish players but, for various reasons, are not available on the Swedish market.

All games on the Swedish market must be certified and meet certain criteria. Games that do not meet the criteria may not be offered on the licensed market, but may of course be available from companies without a Swedish licence. Certain types of games, such as skin betting games, cannot be licensed under current legislation.

Games on the licensed market must also come from a provider that has a gambling software permit.²⁹ However, those who have a gambling software permit may not provide games to operators that operate illegally in Sweden.³⁰ The purpose of the legislative change is to gather the in-demand games among operators with a Swedish licence and thus increase channelling.³¹

²⁸ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

²⁹ Chapter 11, Section 6a of the Gambling Act.

³⁰ Chapter 11, Section 6e of the Gambling Act.

³¹ Government bill 2021/22:242, p. 33.

3.2.5 Alleged higher return to player (RTP)

In the Swedish Gambling Authority's survey conducted in the summer of 2024, 19 per cent of those who had gambled unlicensed stated that they had done so because of better chances of winning/return to player (RTP).³² RTP describes the percentage of all money wagered that a game pays back to players, on average. RTP varies between different games and for the same game on different gambling sites. This applies both within and between the respective markets and between different companies. In the licensed market, the size of the RTP for online gambling is not regulated in the Gambling Act.

Based on discussions between Swedish players on various forums regarding gambling on unlicensed sites, the general perception seems to be that many unlicensed gambling sites have a relatively low RTP on games compared to the licensed market. However, it is not possible for the Swedish Gambling Authority to assess the actual situation regarding differences in RTP between licensed and unlicensed gambling sites due to the extensive range of games on offer.

3.2.6 The possibility of converting cryptocurrency into Swedish kronor (SEK)

According to survey data from summer 2024, a notable proportion (13 per cent) of those who gamble on sites without a Swedish licence state that they do so because the unlicensed market offers other payment options, such as cryptocurrency.³³ This suggests that some players choose to play unlicensed because they can then convert their cryptocurrency holdings, which is not possible on the licensed market. The possibility of making deposits with cryptocurrency and withdrawals via SEPA transfers is often highlighted in marketing for illegal gambling and in discussions on various forums.

A further 13 per cent state that they gamble on unlicensed gambling sites because these sites offer skin betting, i.e. deposits, bets and/or withdrawals can be made using so-called skins from computer games.³⁴

³² Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

³³ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

³⁴ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

3.2.7 Demand based on players' desire for low levels of control and oversight

Section 2.4.2 discussed the particular challenges the Swedish Gambling Authority faces in monitoring gambling in the Asian market, even though there are indications that a small number of Swedish players are generating very large amounts of revenue there. Such gambling takes place in the shadows and is difficult to detect. The gambling sector is also a high-risk sector³⁵ for money laundering, and the risk is considered particularly high in the unlicensed market.³⁶

A study by a British industry organisation cites greater anonymity and fewer checks on players as reasons for gambling outside the licensed system.³⁷ In the Swedish Gambling Authority's survey conducted in the summer of 2024, 11 per cent of those who had gambled unlicensed stated that they gambled on sites without a Swedish licence in order to avoid having to identify themselves.³⁸ This may include, for example, people with gambling problems or others who want to avoid questions about their gambling and/or finances, as licensed companies ask questions as part of their efforts to promote responsible gambling or in their work to prevent money laundering. These questions are unavoidable and important given the obligations imposed on licensed gambling companies under Swedish law.

3.2.8 Gambling on unlicensed sites due to lack of knowledge

Studies conducted by the Swedish Gambling Authority show that Swedish players are generally considered to have a low level of knowledge about the Swedish gambling licence. In a 2023 survey, approximately one third of respondents were aware that Sweden introduced a licensing system on 1 January 2019. Of those asked, 90 per cent said they could not tell whether a

³⁵ Coordinating Function for Measures to Combat Money Laundering and Terrorist Financing, *Nationell riskbedömning av penningtvätt och finansiering av terrorism i Sverige (2020/2021)*, p. 6.

³⁶ Swedish Gambling Authority, *Slutredovisning av uppdrag om att se över hur samarbetet för att bekämpa olaglig spelverksamhet kan stärkas*, p. 4.

³⁷ Betting and Gaming Council, *The size and economic costs of black market gambling in Great Britain*, p. 5.

³⁸ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

gambling site had a Swedish licence or not.³⁹ However, the results vary greatly between different surveys. In the Swedish Gambling Authority's survey conducted in the summer of 2024, 22 per cent stated that they had gambled on an unlicensed site because they did not know whether it had a Swedish licence.⁴⁰ Overall, it is considered likely that gambling on unlicensed gambling sites occurs without the player being aware of whether the gambling site has a Swedish licence or not, and that marketing and/or traffic steering have likely played a role in the player ending up on an unlicensed gambling site in the first place.

In several of the Swedish Gambling Authority's surveys,⁴¹ free-text responses also show that players who believe they have gambled on unlicensed websites have actually gambled on websites with a Swedish licence. Thus, it is difficult to know how large a proportion of players gamble outside the licensing system by mistake. Although half of the players are unaware of any advantages of playing on websites with a Swedish licence,⁴² the vast majority still play within the licensing system.⁴³ Players with less confidence in the Swedish Gambling Authority gamble on unlicensed gambling sites to a greater extent.⁴⁴ The assessment is that efforts to increase knowledge about Swedish gambling licences and their advantages may, to some extent, steer players towards consciously choosing websites with a Swedish licence.

3.3 Target group analysis based on reasons for demand

Who plays on websites without a Swedish licence? Based on the push and pull factors described above, as well as additional data on players from the Swedish Gambling Authority's surveys, it is possible to identify at least four groups for which targeted measures could be considered to limit the proportion of gambling on unlicensed gambling sites. The groups listed below are not exhaustive and overlap each other.

³⁹ Swedish Gambling Authority, *Allmänheten om spel 2023*, pp. 45 and 48.

⁴⁰ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

⁴¹ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, and Swedish Gambling Authority, *Spelvanor online 2023*.

⁴² Swedish Gambling Authority, *Allmänheten om spel 2023*, pp. 51.

⁴³ Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 29 f.

⁴⁴ Swedish Gambling Authority, *Spelvanor online 2023*, p. 57.

- Those who play outside the licensing system without knowing it.
- Those who want to play with fewer limitations and restrictions.
- Minors and young players.
- Those who are self-excluded via Spelpaus.se.

3.3.1 Those who play outside the licensing system without knowing it

As mentioned above, awareness of the Swedish licence is low. Although most people gamble on the licensed gambling market, there is a group of players who play outside the licensed system without knowing it. The Swedish Gambling Authority does not know how large this group is, as it is difficult to measure through the surveys available in this area. Generally speaking, it is easier for players to find gambling sites with a Swedish licence, partly because they have broader marketing opportunities.

3.3.2 Those who want to play with fewer limitations and restrictions

According to several studies, factors such as more bonus offers, different odds, a wider range of games, different types of games, restrictions/limitations imposed by licensed companies, other payment options (e.g. cryptocurrency) and anonymity are common⁴⁵ reasons why players choose unlicensed gambling sites.⁴⁶ A common factor among these players is that they want things that are restricted on the Swedish market. Similar reasons are also given in other comparable countries, such as Denmark.⁴⁷

This group also includes players who want to avoid the gambling company having insight into their gambling. Such players may consider measures such as income checks to be restrictive. Industry representatives often highlight the fact that players turn to the unlicensed market because of the regulations on the licensed market as a problem.

⁴⁵ Reported by at least 10 per cent of respondents.

⁴⁶ For example, Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*; Swedish Gambling Authority, *Spelvanor online 2023*; Public Health Agency of Sweden, *Swelogs 2021*.

⁴⁷ Danish Gambling Authority, *Onlinespil i Danmark*, p. 16.

The restrictions imposed in the regulations are mainly due to various measures for consumer protection and to combat money laundering and match fixing. Players who demand fewer restrictions can be assumed to be more likely to have a gambling problem than other players, given that gambling problems are characterised by difficulties in limiting one's gambling.⁴⁸ An increase in the number of people with gambling problems may lead to more people self-excluding via Spelpaus.se and thus more people seeking gambling outside the licensed system.

A high level of consumer protection within the licensing system may therefore lead to lower channelling. Restrictions aimed at combating money laundering and match fixing are also important to prevent the licensed market from being exploited by criminals. It is not possible to accurately gauge the number of people who use gambling for other criminal activities, but it is important to bear this group in mind and try to exclude them from gambling on the licensed market.

Certain difficult trade-offs are therefore required in the regulation of the licensed market in order to maintain a high level of consumer protection and to combat money laundering and match fixing, while at the same time ensuring that players are not tempted to seek out unlicensed alternatives. The fact that money laundering regulations are regulated at the EU level and, in principle, fully harmonised in key areas from 10 July 2027 will likely contribute to this.

There will probably always be a group that finds it attractive to gamble outside the licensed system. This group will be very difficult to channel.

3.3.3 Minors and young players

Gambling among minors and young people has increased since re-regulation of the gambling market.⁴⁹ In the licensed market, 18 per cent of all gambling

⁴⁸ Public Health Agency of Sweden, *DSM-5*.

⁴⁹ Swedish Council for Information on Alcohol and Other Drugs (CAN), *Nationell skolundersökning 2024*, p. 6.

accounts belong to young players (aged 18–24).⁵⁰ A larger proportion of young people (aged 18–29) gamble on unlicensed gambling sites compared to older age groups, although the majority of young people still gamble on licensed gambling sites.⁵¹

In the unlicensed market, there are rarely requirements for verified age checks, which makes it easy for minors to gamble with unlicensed operators. In the Swedish Gambling Authority's survey of young players (aged 18–29), 26 per cent of those who had gambled before the age of 18 had done so online on gambling sites that did not require age verification. Of those in this age group who self-excluded via Spelpaus.se, the corresponding figure was 44 per cent. In free-text responses, skin betting was cited as the first type of gambling that young people played before the age of 18. This is also supported by interviews of young people conducted by the Swedish Gambling Authority. Those interviewed consider skin betting and loot boxes to be a gateway from computer games into gambling for money.⁵² Skin betting, which is only available on the unlicensed market, is played almost exclusively by young players.⁵³ Eight per cent of 16–17-year-olds and six per cent of 18–19-year-olds say they have gambled using skins.⁵⁴

According to a survey by a British industry organisation, young people also use VPN tunnels, social media and cryptocurrency more for their gambling – gambling behaviours that generally involve gambling outside the licensed system.⁵⁵

3.3.4 Those who are self-excluded via Spelpaus.se

According to several surveys, those who have self-excluded represent a significant proportion of those who have gambled on gambling sites without a

⁵⁰ Licensed gambling companies' reporting to the Swedish Gambling Authority, second half of 2023.

⁵¹ Swedish Gambling Authority, *Allmänheten om spel 2024*, p. 52.

⁵² Swedish Gambling Authority, *Att kartlägga de bakomliggande faktorerna till att ungas spelande ökar och hur sådant spelande finansieras samt att följa utvecklingen av ungas spelande*.

⁵³ Public Health Agency of Sweden, *Swelogs 2021*, p. 44.

⁵⁴ Public Health Agency of Sweden, *USUF 2021*, p. 37.

⁵⁵ Betting and Gaming Council, *The size and economic costs of black market gambling in Great Britain*, p. 5.

Swedish licence.⁵⁶ Currently, just over 124,000 people are excluded via the national self-exclusion system, Spelpaus.se.⁵⁷ The most common reason people give for self-exclusion is problems with limiting their gambling.⁵⁸

As part of a government assignment (2023), the Swedish Gambling Authority has investigated the extent to which people who are self-excluded via Spelpaus.se have gambled during their self-exclusion period. In the survey conducted as part of the report, 41 per cent of respondents said that they had gambled during the self-exclusion period,⁵⁹ of which 37 per cent had gambled on unlicensed gambling sites.⁶⁰

3.4 The taxation of gambling winnings – not sufficiently dissuasive to limit demand

Under Chapter 8, Section 3 of the Income Tax Act (1999:1229), gambling winnings are tax-exempt for the player under the following conditions.

- The gambling is provided by an operator licensed under the Gambling Act and the gambling is subject to licensing.
- The gambling is provided in Sweden and is exempt from licensing requirements under the Gambling Act.
- The gambling is provided in a country within the European Economic Area (EEA) and does not require licensing in Sweden.

Gambling winnings provided by gambling companies within the EU/EEA, such as companies based in Malta or Estonia, are therefore tax-free if they are not considered to be targeted at the Swedish market. The Swedish Tax Agency and the player must therefore assess whether the activity is targeted at the Swedish

⁵⁶ 25 per cent according to the Swedish Gambling Authority, *Spelvanor online 2023*, p. 35 and 11 per cent according to the Swedish Gambling Authority, *Den offentliga kontrollen över spelmarknaden*, p. 9.

⁵⁷ 1 April 2025.

⁵⁸ Swedish Gambling Authority, *Kunskap om och utveckling av självavstängningsregistret (Spelpaus.se)*, p. 9 f.

⁵⁹ Swedish Gambling Authority, *Kunskap om och utveckling av självavstängningsregistret (Spelpaus.se)*, p. 21.

⁶⁰ *Ibid.*, p. 11.

market or not. Gambling from operators outside the EEA, such as Curaçao, are always taxed if the winnings exceed SEK 100, regardless of which market the gambling targets. Those who gamble via these operators must always take the tax consequences into account.⁶¹

These rules create a tax advantage for those who choose licensed gambling companies or companies within the EU/EEA that do not specifically target the Swedish market. At the same time, this means that players who gamble via unlicensed operators outside the EU/EEA, or gambling companies that target the Swedish market without holding a Swedish licence, are liable to pay tax on their winnings.⁶²

The tax difference between gambling with licensed versus unlicensed operators can affect players' behaviour in several ways.

- The tax exemption for gambling with licensed operators makes them more attractive to players who want to avoid administrative and financial penalties. This strengthens the channelling rate and is an important tool for directing players to the regulated market.
- Since winnings from unlicensed operators within the EU/EEA that do not target the Swedish market are also tax-free, this may encourage some players to seek out these alternatives.
- Unlicensed operators outside the EU/EEA, such as Curaçao, should be less attractive due to the tax liability on winnings.

It is important to emphasise that the tax advantages for licensed operators can only be maintained if the Swedish Tax Agency is able to effectively tax winnings that are subject to tax. In order to maintain the channelling rate, the supervision and taxation of winnings from unlicensed operators, particularly those outside the EU/EEA, must be effective and consistent.

Through its monitoring of the external environment, the Swedish Gambling Authority has noted that players repeatedly discuss whether or not they need to

⁶¹ Swedish Tax Agency, *Vinster i spel och tävlingar*.

⁶² Ibid.

pay tax on winnings, depending on which gambling site they choose to gamble on. Gambling sites licensed within the EU/EEA are often marketed as tax-free. According to discussions on forums and social media, many of these players seem to believe that they themselves must declare these gambling winnings in order to be taxed on them. If they avoid doing so, they believe it is unlikely that the Swedish Tax Agency will discover their failure to declare their gambling winnings.

Through the cooperation between the Swedish Gambling Authority and the Swedish Tax Agency, it has emerged that the Gambling Act's scope of application, with its targeting criterion, poses challenges from an income taxation perspective, and that a very small number of players declare winnings from taxable unlicensed gambling.

3.5 The Swedish Gambling Authority's assessment

The overall situation regarding demand for unlicensed gambling is complex and raises questions about factors such as the importance of having an attractive, modern, healthy and secure Swedish licensed market that adapts to the rapid developments in the gambling sector and new products while maintaining a high level of consumer protection. The licensed market should not compete with the unlicensed market by lowering its levels of consumer protection, gambling-related safety, and efforts to prevent money laundering and other mandatory considerations. However, it remains important to continue to develop understanding of demand and, where possible, take targeted measures to develop the regulatory framework in relation to the target groups that consume, or will consume, unlicensed gambling, whether consciously or unconsciously. Targeted information campaigns by the Swedish Gambling Authority and other authorities are important to raise awareness of the risks of unlicensed gambling and thereby limit demand for such gambling.

The Swedish Gambling Authority intends to carry out the following:

- **Through various analytical methods, continue to expand the Authority's knowledge of the underlying factors driving demand for unlicensed gambling.**

- **Continue with targeted information campaigns aimed at young players and other target groups, including the broad group that currently lacks sufficient knowledge about the Swedish licence and the risks of unlicensed gambling. With this in mind, the Swedish Gambling Authority also intends to review how licence holders make it clear that their operations are licensed in Sweden.**
- **In 2025, further develop Spelpaus.se in terms of both different self-exclusion periods and how the information on Spelpaus.se is formulated so that people with gambling problems can come into contact with other actors who can offer the necessary support.**
- **In collaboration with other authorities and other actors, contribute knowledge about the target groups that play outside the licensing system and the risks this entails. Where such demand is based on criminal activity, such as tax evasion or money laundering, continue to collaborate with the Swedish Tax Agency and law enforcement authorities.**

4 Marketing of unlicensed gambling sites

Marketing and traffic steering are key mechanisms used to attract and steer Swedish players to gambling alternatives outside the licensed market. These mechanisms make the unlicensed market more accessible to players by making the offering visible while stimulating demand. This section aims to deepen the understanding of various mechanisms used, such as affiliate marketing, comparison sites, the use of cookies and direct marketing.

4.1 Affiliate sites and comparison sites

Affiliate sites and comparison sites (see also section 2.2) play a significant role in driving traffic to unlicensed gambling sites. Such sites often appear in the search results of various search engines.

These sites act as intermediaries and are often created for the purpose of comparing different gambling sites for potential players. Affiliate sites often have a financial relationship with the unlicensed gambling companies and receive compensation for each player they manage to direct to the gambling company's gambling sites, for example through clicks on links or by players registering and starting to play.

Comparison sites also help drive players to unlicensed gambling companies by presenting their gambling sites as attractive alternatives to licensed operators. These sites often highlight advantages such as generous bonuses, the absence of Swedish gambling restrictions and easy deposit options, which attract players looking for less regulated alternatives. The fact that these sites often appear to be independent and comparative boosts their credibility, which can make it more difficult for consumers to identify them as part of a marketing strategy for unlicensed operators.

Marketing, including affiliate marketing, is the most common ground that the Swedish Gambling Authority cites in its bans when finding that an unlicensed gambling company has illegally targeted Sweden, and it is something that the Swedish Gambling Authority constantly monitors.

4.2 Use of cookies and data collection

Cookies and data collection are other important tools that unlicensed gambling companies and their affiliates use to enhance traffic management. Cookies are small text files that are stored on a user's device when they visit a website, enabling the tracking of a player's online behaviour and the customisation of advertising based on the player's preferences and behaviour patterns. By collecting data on which websites a player visits, how much time they spend there and what interactions they make, marketing can become increasingly targeted and effective over time.

Unlicensed operators and affiliates use such data to create tailored offers and promotions that can attract players to their gambling sites. This method creates a more personalised experience and increases the risk that players will continue to choose unlicensed alternatives.

4.3 Social media and targeted advertising

Social media is another effective tool used by unlicensed gambling companies and their affiliates to market their gambling sites. Platforms such as Facebook, Instagram and TikTok offer opportunities to target advertising directly at Swedish players based on their interests, behaviour and demographic information. This enables unlicensed gambling companies to reach a large target audience and market their products without appearing on traditional marketing channels.

It is particularly problematic that these operators can disguise their advertisements as other types of posts or offers, making it difficult for consumers to recognise them as advertising. This leads to a situation where Swedish players are unknowingly exposed to advertisements for unlicensed gambling alternatives, which undermines efforts to channel players to the licensed market.

4.4 Direct marketing through anonymous text messages and emails

Another method used to reach Swedish players is direct marketing through anonymous text messages and emails. These messages often contain offers of generous bonuses, quick deposits and links to unlicensed gambling sites. They can be designed in such a way that they appear to come from a legitimate source, making it difficult for consumers to identify the sender. These messages can be sent either directly from the gambling operator or via affiliates who distribute their specific affiliate links. The problem with these messages is that they are often difficult to trace and it is not clear who is behind them. A common example is a text message with text like: 'Play now and get a 100% bonus! Click here: [link]'. In this way, unlicensed operators can send targeted messages in Swedish, which creates a sense of legitimacy.

4.5 Marketing of skin betting

Marketing for websites that offer skin betting mainly takes place via streamers and/or influencers. According to the Swedish Gambling Authority, marketing on social media was particularly intense during 2023–2024, which was a likely reason why the Swedish Gambling Authority measured particularly high levels of internet traffic to sites offering skin betting during this period. According to the Swedish Gambling Authority's measurements, internet traffic from Sweden increased steadily during 2023, reaching around 9 million visits in January 2024.

The Swedish Gambling Authority identified around 30 Swedish-speaking influencers who promoted such gambling sites, mainly via streams on the video-sharing platform Twitch. However, the number of visits to such gambling sites declined sharply in March and April 2024.

This may be attributable to a March 2024 ban issued by the Swedish Gambling Authority on three gambling companies offering skin betting in Sweden, and a series of investigative reports on skin betting and casino streaming broadcast by SVT in mid-April. In April 2024, only a few Swedish streamers were promoting skin betting. In the latter part of 2024, some streamers resumed their marketing, some of whom began streaming in English instead of Swedish. This can be

assumed to be in order to continue marketing to an international audience and thus circumvent the risk of committing illegal promotion in Sweden.

4.6 Action against actors promoting illegal gambling

On 1 January 2023, an administrative ban on promoting illegal gambling was introduced in the Gambling Act, giving the Swedish Gambling Authority the opportunity to take action against actors who promote participation in illegal gambling for the purpose of acquisition.⁶³

This may, for example, concern those who market gambling without the necessary licence, gambling software suppliers who deliver to operators who do not have the necessary licence, or payment service providers who go beyond their normal payment assignment to deliver to operators who do not have a Swedish licence. Other actors may also be subject to the ban on promotion. Seven cases have been opened since its introduction. One of these resulted in a decision by the Swedish Gambling Authority on 6 July 2023 to impose a ban coupled with a fine on a payment service provider. However, the ban was lifted by a ruling of the Administrative Court of Appeal on 7 February 2025 (KR 1859-24) (see also section 2.5).

The Swedish Gambling Authority works continuously with promotion cases. Depending on the circumstances, supervision may also include – in addition to the above – subjects such as influencers, owners of affiliate sites or hosting service providers that have provided web addresses to companies engaged in illegal gambling. Payment agents that handle payment transactions for illegal operators are also considered potential subjects of supervision.

Generally speaking, supervision regarding the promotion of illegal gambling can be considered an effective tool against Swedish companies, as an injunction in such cases can be coupled with a fine.⁶⁴ One challenge is that it is generally difficult to determine who is behind an affiliate site, i.e. who should be the recipient of the injunction. There are also legal challenges regarding how the

⁶³ Chapter 3, Section 7 of the Gambling Act.

⁶⁴ There are a number of practical difficulties associated with coupling decisions with fines aimed at foreign operators, such as service of process and collection of the fine.

ban on promotion can be applied to certain types of payment intermediaries. Here too, the problem is linked to the question of the Gambling Act's scope of application and the current targeting criterion.

4.7 The Swedish Gambling Authority's assessment

Marketing and traffic steering are key mechanisms used to attract and steer Swedish players to gambling alternatives outside the licensed market. The Swedish Gambling Authority monitors this in various ways and takes action against such activities within the framework of the ban on promotion in the Gambling Act.

The marketing of unlicensed gambling is something that gambling authorities in all countries actively monitor and try to intervene against. International cooperation in this area is therefore particularly important. The Swedish Gambling Authority believes that a change in the Gambling Act's scope of application would make the work against marketing more effective for both the Swedish Gambling Authority and law enforcement authorities.

The Swedish Gambling Authority intends to carry out the following:

- **Develop methods, particularly technical methods, to detect the marketing of illegal gambling. This is because various forms of marketing attract or steer Swedish players to gambling alternatives outside the licensed market.**
- **Continue to monitor developments in how gambling is marketed and share this knowledge in collaboration with, among others, the Swedish Consumer Agency, law enforcement authorities and gambling authorities in other countries.**

5 Unlicensed gambling – a challenge for all regulated markets

Unlike areas such as money laundering, where there is an international regulatory framework through the Financial Action Task Force (FATF) and increasingly harmonised EU legislation, the gambling sector is an area where the supranational and international framework is underdeveloped. There is no EU legislation specifically regulating gambling. However, the gambling regulations of Member States must comply with the rules on free movement in the Treaty on the Functioning of the European Union (TFEU). According to the established case law of the Court of Justice of the European Union (CJEU), Member States have considerable discretion to choose the objectives and level of protection to be afforded to consumers and the public order in the regulation of gambling, based on their specific circumstances.⁶⁵ Today, gambling authorities cooperate in voluntary forums for the exchange of information and experience, as well as bilaterally. The European Commission has not convened any working/expert group focused on the gambling sector since 2018.

In this section, the Swedish Gambling Authority would like to highlight:

- International forums and cooperations in which the Authority participates, and how these contribute to the work to combat illegal gambling.
- Good examples from other countries identified through international cooperation, such as effective methods for restricting unlicensed gambling.
- Current legal proceedings within the EU that once again raise the issue of the compatibility of national gambling laws with EU law.

5.1 GREF – Gaming Regulators European Forum

The Gaming Regulators European Forum (GREF) is a European forum that brings together gambling authorities from various European countries. The main

⁶⁵ See, for example, the judgment in Domenico Politanò, C-225/15, EU:C:2016:645, paragraphs 39 and 40 and the judgments referred to therein.

purpose of GREF is to promote a safe and fair gambling environment by facilitating the exchange of knowledge, experiences and *best practice* between members. Although the participating countries are all European, the gambling regulations and national conditions and interests differ between the gambling authorities of the various participating countries. A central part of GREF's work is the Enforcement Working Group (EWG), which focuses on combating illegal gambling and maintaining regulated markets. The working group exchanges experiences on possible strategies to combat illegal gambling, operational issues relating to supervisory methodology and possible cooperations with payment service providers, internet service providers and social media platforms. The Swedish Gambling Authority participates in the working group and, through it, has participated in joint meetings with international search engines such as Google and other information exchanges to strengthen national efforts in this area. The assessment is that participation has provided significant added value for the Swedish Gambling Authority in the form of exchange of experiences, as well as greater weight in contacts with global companies such as Google thanks to coordinated messages from multiple European gambling authorities.⁶⁶

5.2 IAGR – International Association of Gaming Regulators

The International Association of Gaming Regulators (IAGR) is a global organisation consisting of gambling authorities from different countries and regions. IAGR's goal is to increase the effectiveness and cooperation between member authorities in order to strengthen gambling regulation globally. Through information exchange, training and cooperation, IAGR strives to develop good practices and a fair and safe gambling market. The Illegal Gambling Working Group (IGWG) is a new working group within IAGR that was established in 2024. The group's objective is to strengthen international cooperation in combating illegal gambling and to develop effective global solutions for supervisory issues. The Swedish Gambling Authority participates actively in IGWG and contributes with its experience of supervision and regulation in Sweden. IGWG is a valuable forum for the Swedish Gambling Authority, as it complements its work by providing a global perspective on

⁶⁶ See also GREF's joint declaration against illegal gambling. <https://gref.eu/news/gref-declaration-of-gambling-regulators-on-their-concerns-regarding-illegal-operators/>.

common challenges related to unlicensed gambling, even though the gambling regulations and conditions of the participating authorities vary greatly.

5.3 Cooperation with Nordic gambling authorities

The Swedish Gambling Authority also cooperates closely with other Nordic gambling authorities. Regular meetings are held at several levels, including at the director general level, to exchange information and coordinate efforts. Although the Nordic countries' gambling regulations differ, for example Norway has a monopoly and Finland is in the process of introducing a licensing system, Nordic cooperation is extensive and a priority. The Swedish Gambling Authority gains practical benefits from this cooperation in the form of the exchange of information and joint problem solving.

5.4 Memorandum of Understanding (MoU)

The Swedish Gambling Authority has entered into bilateral agreements, known as Memoranda of Understanding (MoUs), with the gambling authorities in Gibraltar, Malta, the Netherlands and the United Kingdom. The agreements regulate cooperation and the exchange of information with the gambling authority in each country. The Swedish Gambling Authority intends to develop its work within and with the MoUs in the coming years.

5.5 Experiences from other comparable countries

Based on, among other things, the exchange of experiences within GREF and in bilateral contacts, the Swedish Gambling Authority finds that the Netherlands, Denmark and the United Kingdom have gambling regulations comparable to those in Sweden. However, it is also important to highlight good examples from other countries. In all comparisons, however, it is important to remember that, despite similarities in national gambling regulations, there may be cultural and other reasons why factors such as consumption patterns and demand for gambling differ. The Swedish Gambling Authority also finds that there is generally a lack of robust and up-to-date evaluations of different countries' regulations.

5.5.1 Denmark

The Danish gambling market underwent re-regulation in 2012.⁶⁷ Danish and Swedish gambling legislation have many similarities. Among other things, the scope of application for illegal gambling is similar – gambling must be targeted at the Danish market in order to be subject to licensing.⁶⁸

Unlike in Sweden, the Danish Gambling Authority has the power to order internet service providers to block illegal websites in the DNS.⁶⁹ The orders are handled in court and blocking may only be used if the gambling site continues to target the Danish market after communication with the Danish Gambling Authority. However, the Danish Gambling Authority is aware that players still gamble on certain DNS-blocked gambling sites using VPN solutions.⁷⁰

Unlike the Swedish Gambling Authority, the Danish Gambling Authority has taken action against gambling sites that offer gambling with the digital currency 'Robux' in the computer game Roblox,⁷¹ as well as against the marketing of gambling on social media.⁷² To make social media monitoring more efficient, the Danish authority uses a tool that automatically records live broadcasts.⁷³ They also work with Apple and Google to remove apps with illegal gambling activities from Apple's app stores⁷⁴ and work with Facebook to delete marketing.

5.5.2 The Netherlands

In October 2021, the Dutch gambling market was re-regulated into a licensed market. In connection with the re-regulation, the scope of illegal gambling was changed from a targeting criterion to a participant perspective.⁷⁵ This means

⁶⁷ Danish Gambling Authority, *The gambling market in numbers 2023*, p. 3.

⁶⁸ Danish Gambling Authority, 'Ulovligt spil'.

⁶⁹ Danish Gambling Authority, *Report on illegal gambling 2023*, p. 8.

⁷⁰ Contact with the Danish Gambling Authority.

⁷¹ Danish Gambling Authority, 'Spillemyndigheden har fået blokeret 79 ulovlige spilsider'.

⁷² Danish Gambling Authority, 'Streamer får bøde for at formidle spil ulovligt'.

⁷³ Contact with the Danish Gambling Authority.

⁷⁴ Danish Gambling Authority, *Report on illegal gambling 2023*, p. 9.

⁷⁵ The Netherlands Gambling Authority, 'Ksa: nieuwe aanpak illegale online kansspelaanbieders'.

that as soon as Dutch consumers can access and gamble on a website, the game is considered to be provided in the Netherlands and requires a licence.

The Netherlands Gambling Authority has been able to collect penalty fees from gambling companies based in Malta and Curaçao, which is interesting.⁷⁶ As a last resort, the Authority also has the power to order various actors (hosting service providers, internet service providers) to block websites that either engage in or promote illegal gambling activities.⁷⁷ They also cooperate with the hosting service provider Cloudflare, which provides information about the owners of affiliates.⁷⁸

The Netherlands Gambling Authority has conducted supervision of at least 50 affiliates that have targeted marketing for unlicensed gambling activities at the Dutch market. The Authority has intervened by sending information notices on the promotion of illegal gambling,⁷⁹ and by shutting down affiliates that have marketed gambling without the necessary licence.⁸⁰ To identify the owners of gambling sites, the Netherlands Gambling Authority uses OSINT data and information from hosting service providers. This is combined with contacts with the gambling authorities of other countries and authorities responsible for company registration.

In the Netherlands, the definition of gambling is similar to that in Sweden.⁸¹ Unlike in Sweden, the Netherlands Gambling Authority has defined the loot boxes in the game Counter-Strike as gambling for money. As a result, skin trading on Steam was restricted in the Netherlands, which could make skin betting more difficult as it is enabled via Steam's marketplace.⁸²

⁷⁶ Contact with the Netherlands Gambling Authority.

⁷⁷ GREF, *Enforcement Working Group*, p. 65.

⁷⁸ The Netherlands Gambling Authority, 'Kanspelautoriteit en Cloudflare maken afspraken over aanpak illegale aanbieders'.

⁷⁹ The Netherlands Gambling Authority, 'Ksa attendeert affiliatewebsites op regels voor reclame kansspelen'.

⁸⁰ The Netherlands Gambling Authority, 'Kansspelautoriteit verscherpt aanpak reclame op internet voor kansspelen zonder vergunning'.

⁸¹ Netherlands Gambling Law, Article 1(1)(a).

⁸² Xiao & Henderson, 'Illegal video game loot boxes with transferable content on steam: a longitudinal study on their presence and non-enforcement of gambling law', 498–524.

5.5.3 United Kingdom

The UK Gambling Act's scope of application for illegal gambling activities is based on a participant perspective. It is sufficient for the game to be available to persons in the United Kingdom for it to be considered subject to licensing.⁸³

Virtual currencies are permitted on the licensed market in the United Kingdom,⁸⁴ and some crypto casinos sponsor teams in the English Premier League.⁸⁵ Such gambling sites have high internet traffic from Sweden, even though they do not actively target Sweden. However, Swedish players do not have access to games under the UK licence, but they do have access to the companies' licences in Curaçao and Anjouan.

The UK Gambling Commission is working with, inter alia, the hosting service provider GoDaddy to remove gambling sites that engage in illegal gambling activities and with the search engine Google to remove search results that lead to such gambling sites. In 2023, 113 websites with 28,000 URLs were removed from Google in the UK through this cooperation.⁸⁶ Payment service providers also block payments to websites that engage in illegal gambling activities.⁸⁷ Going forward, the UK Gambling Commission plans to interact with gambling software permit holders to ensure that they stop providing software to illegal websites. Contact with licence holders is also planned for this purpose.⁸⁸

5.6 Other observations on international trends

The Swedish Gambling Authority also monitors developments in countries other than those mentioned above with regard to efforts to combat illegal gambling. Internationally, the main measures discussed to combat illegal gambling are blocking websites, blocking payments and cooperation with third parties (e.g.

⁸³ Gambling Act 2005, Section 33 and 36(3); Gambling Licensing and Advertising Act 2014 Extended Licensing Scope.

⁸⁴ Elliot & Kaftan, 'Gambling Laws and Regulations UK 2025'.

⁸⁵ bc.game, stake.com, rollbit.com.

⁸⁶ Gambling Commission, 'Sarah Gardner speech' (presenter, KPMG Gibraltar pre-summit DEI seminar, Gibraltar, July 2024).

⁸⁷ Gambling Commission (2023) High Stakes: Gambling Reform for the Digital Age.

⁸⁸ Gambling Commission, 'Illegal Markets' (presentation, IAGR conference, Rome, October 2024).

search engines, hosting providers). Some countries have also criminalised participation in illegal gambling.⁸⁹

In Germany, it is the companies that are taxed instead of the players. This means that the owners of companies that engage in illegal gambling are guilty of tax offences in Germany, which has caused some companies to leave the German market.⁹⁰ There are greater opportunities for international legal assistance related to tax law.⁹¹

In France, in addition to blocking and sanctions, information campaigns against illegal gambling are also conducted. In October 2024, the National Gambling Authority of France (ANJ) launched a campaign to inform the public about the risks of gambling on websites that provide illegal gambling.⁹² In 2023, the ANJ also conducted a survey of illegal offerings and found around 100 mobile apps offering illegal gambling, 14 of which had traffic from French users.⁹³ This shows that illegal gambling can take various forms, such as mobile apps. Mobile apps are a channel that has been less prominent in Sweden to date (the Swedish Gambling Authority has rarely identified unlicensed mobile apps on the Swedish market).

5.7 The relationship between EU law and national gambling regulations has once again been brought before the CJEU

According to case law from the CJEU, gambling constitutes a service within the meaning of the EU Treaty. Lotteries, slot machines, etc. constitute goods when they are sold separately from the service. The fundamental principles of the EU

⁸⁹ European Commission, *Evaluation of Regulatory tools for Enforcing Online Gambling Rules and Channelling Demand towards Controlled Offers* ; GREF, *Enforcement Working Group* ; Regulus partners, *Reducing online gambling black markets*; Contact with other gambling authorities in various forums (e.g. GREF, IAGR).

⁹⁰ Regulus partners, *Reducing online gambling black markets*, p. 34.

⁹¹ See e.g. OECD (2023). *Convention on Mutual Administrative Assistance in Tax Matters*. <https://www.oecd.org/tax/exchange-of-tax-information/convention-on-mutual-administrative-assistance-in-tax-matters.htm> and European Union (2023). *Council Directive on Administrative Cooperation in the field of taxation (DAC)*. https://taxation-customs.ec.europa.eu/direct-administrative-cooperation-field-taxation-dac_en

⁹² ANJ, 'Casinos en ligne : l'ANJ lance une campagne d'information pour rappeler l'illégalité et la dangerosité de ces sites de jeux non autorisés en France'.

⁹³ ANJ, *Etude sur l'offre illégale de jeux d'argent et de hasard en ligne accessible en France*, p. 15.

Treaty, including the free movement of services and goods, therefore apply to the gambling market. However, according to the established case law of the CJEU, Member States have considerable discretion to choose the objectives and level of protection to be afforded to consumers and the public order in the regulation of gambling, based on their specific circumstances.⁹⁴ Following a number of preliminary rulings by the CJEU, which form the basis for current practice in this area, the period 2018–2023 was uneventful in terms of new judgments from the CJEU. The question is whether this was only temporary.

The judgment in the request for a preliminary ruling in Case C-695/21 has attracted some attention among gambling authorities in the EU.⁹⁵ The case concerned fines that the Belgian gambling authority had imposed on three companies operating gambling halls with games of chance in the Netherlands for advertising their gambling halls in Belgium. On 2 March 2023, the CJEU ruled that Belgian legislation was contrary to Article 56 of the TFEU. In Belgium, domestic gambling halls that have been granted an exemption were allowed to engage in certain advertising despite a general ban, while foreign operators were not granted a similar exemption for the same purpose. This was considered discriminatory and therefore incompatible with the free movement of services.

The Swedish Gambling Authority has noted that there are also reports that national courts have requested or are in the process of requesting preliminary rulings from the CJEU on issues concerning various aspects of the relationship between national gambling regulations and EU law.⁹⁶ Some of these requests are a direct consequence of judgments handed down primarily by German and Austrian courts, requiring foreign gambling companies operating in these markets without a licence to repay money to German and Austrian players. Some of the companies have not paid such compensation as required by the judgments, which has led the players to seek to claim the money in Malta, where the companies have their licences. In this context, a Maltese court has

⁹⁴ E.g. the judgments in *Sporting Exchange*, C-203/08, EU:C:2010:307, paragraphs 27 and 28, *Zeturf*, C 212/08, EU:C:2011:437, paragraphs 39 and 40, and *Domenico Politanò*, C-225/15, EU:C:2016:645, paragraphs 39 and 40.

⁹⁵ ANJ 'Déclaration des régulateurs autrichien, français, allemand, portugais, espagnol et britannique'.

⁹⁶ Lindenberg, 'Another German court suspends player cases, seeks ECJ ruling on online gambling'.

requested a preliminary ruling (Case C440/23 – European Lotto and Betting and Deutsche Lotto- und Sportwetten) from the CJEU. No decision has been made in the case as yet. The Maltese court has, among other things, asked the following question regarding German gambling regulations.

Is article 56 TFEU to be interpreted to the effect that the infringement of the freedom of services by a general prohibition of online slots in the member state of the consumer (state of destination) towards online casino operators that are licensed and regulated in their state of origin (Malta) cannot be justified by compelling reasons of the common good?

In other words, in the coming years, the CJEU will once again rule on issues concerning the relationship between national regulations and EU law. It remains to be seen whether the CJEU will confirm existing case law or depart from it. For Sweden, it is important to closely monitor this development and take action if necessary, for example by the Government Offices of Sweden intervening in relevant cases to protect Swedish interests.

5.8 The Swedish Gambling Authority's assessment

Issues relating to illegal online gambling are cross-border issues that challenge gambling regulations in different countries within the EU and globally. In the absence of supranational regulation and international standards related to gambling, it is important that there is a good exchange of experiences between gambling authorities in different countries. The Swedish Gambling Authority has bilateral agreements and intends to develop these in the coming years. The Authority will also continue to be an active member of the international forums available through GREF and IAGR. The Authority considers an exchange of experience of this type to be particularly value in terms of information on new regulatory solutions and technical aids in investigations concerning illegal online gambling.

Gambling regulations and their scope of application vary between countries. The Swedish Gambling Authority finds that countries that only have what is known as a *two-tier market* (one licensed and one illegal, where everything unlicensed is prohibited), compared to Sweden, which has a de facto *three-tier*

market (one licensed, one unlicensed legal and one unlicensed illegal), can work more effectively to channel online gambling to the licensed market. Such regulation is not only important for clarity in the scope of application itself, but also for associated regulation aimed at limiting the supply, availability and demand for unlicensed online gambling. These countries also have various other solutions that are currently lacking in Sweden, such as DNS blocking of illegal gambling sites. However, it is difficult to assess the actual effectiveness of such solutions based on existing material, as in many cases they have not been evaluated.

Although the gambling sector lacks supranational regulation, such regulation exists in related areas within the money laundering regulations and in relation to match fixing. In May, the Council adopted a new regulation harmonising money laundering regulations in the EU for the first time (entering into force on 10 July 2027), and in the summer of 2025, a fully-fledged EU authority (the Authority for Anti-Money Laundering and Countering the Financing of Terrorism, AMLA) with supervisory responsibilities related to money laundering. Sweden's admission to the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention) will also enable deeper European cooperation in the future on issues related to illegal gambling. These forums will, in various ways, enable the Swedish Gambling Authority to raise issues related to problems with illegal gambling in the respective contexts.

The Swedish Gambling Authority recommends the following:

- **The Government Offices of Sweden should continue to actively monitor developments regarding preliminary rulings in the Court of Justice of the European Union (CJEU) and, where necessary, intervene in such cases based on the importance of safeguarding Swedish interests regarding how EU regulations should be applied.**

The Swedish Gambling Authority intends to carry out the following:

- **Continue to be an active participant in existing international multilateral partnerships (GREF and IAGR) with the aim of gathering relevant knowledge to develop the Swedish gambling market. In addition, work for coordinated and/or joint measures to influence various relevant actors (e.g. submissions to social forums).**

- **To the extent possible, work to ensure that issues related to illegal gambling are addressed in the EU's intensified anti-money laundering efforts and the Council of Europe's work to combat match fixing.**

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