

Open Consultation on GEO-BLOCKING AND OTHER GEOGRAPHICALLY-BASED RESTRICTIONS WHEN SHOPPING AND ACCESSING INFORMATION IN THE EU

INTRODUCTION

This consultation aims at gathering views and opinions on the different restrictions faced by users, consumers and businesses when they access or provide information, shop or sell across the borders in the European Union.

This will inform the Commission for its ongoing work in preparing legislative proposals on geo-blocking under the Digital Single Market Strategy as well as the follow up to the forthcoming Internal Market Strategy for Goods and Services planned for October 2015.

Questions apply regardless of whether the action takes place online or offline, unless the context makes it clear otherwise.

The public consultation is available in all official languages.

The views expressed in this public consultation may not be interpreted as stating an official position of the European Commission.

If a respondent wishes to have confidential treatment of his/her response, this will be ensured.

For further information and background on this consultation, please refer to the background document

[Geoblocking%20introduction%20text.pdf](#)

This public consultation will close on 28 December 2015 (12 weeks from the day when all language versions have been made available).

How to answer the questionnaire

This questionnaire is composed of two sets of questions: one for customers and one for traders.

If you are a consumer or reply on behalf of consumers, please choose "consumer perspective" in question 1.

If you are a business or reply on behalf of businesses you can choose to reply:

- as a business mainly selling goods and services, please choose "company perspective" in question 1
- as a business mainly buying goods and services, please choose "consumer perspective" in question 1
- as a business selling AND buying goods and services, please choose "consumer AND company perspective" in question 1

Respondents living with disabilities can request the questionnaire in .docx format and send their replies in email to the following address:

CNECT-GEOBLOCKING-CONSULTATION@ec.europa.eu.

If you are an association representing several other organisations and intend to gather the views of your members by circulating the questionnaire to them, please send us a request in email and we will send you the questionnaire in .docx format. However, we ask you to introduce the aggregated answers into EU Survey. In such cases we will not consider answers submitted in other channels than EU Survey.

INFORMATION ABOUT THE RESPONDENT

1. Please indicate who you are (single choice):

- Consumer perspective
- Company perspective
- Consumer AND company perspective
- Others

Tell us about you

- Company providing goods or services
- Business federation
- Chambers of commerce

Please specify the sector of activity

Online gambling products

2. Please indicate your place of residence or establishment:

Belgium

3. Please specify if you are based in:

- A city (cities of more than 50,000 inhabitants)
- A (small) town or suburban area (5,000 to 50,000 inhabitants)
- A rural area

4. Please provide your contact information (name, address and e-mail address)

European Gaming and Betting Association (EGBA), Rue Gray 50 1040
Brussels, egba@egba.eu

5. Is your organisation registered in the Transparency Register?

- Yes
- No
- Not relevant

Registration No.

29508582413-52

You have the opportunity to register your organisation
(http://europa.eu/transparency-register/index_en.htm) before you submit your contribution.

If you are an association, would you like to share with the Commission any evidence collected from your members or from other sources on geo-blocking or/and other forms of discrimination based on customer's nationality, location or residence?

500 character(s) maximum

Please upload your file (pdf or doc)

QUESTIONS

Traders

1. As a general principle, consumers and businesses should be able to purchase and access services from everywhere in the EU

- I strongly agree
- I agree
- Neither agree nor disagree
- I disagree
- I strongly disagree

Comments

3000 character(s) maximum

The Single Market is one of the main objectives and achievements of the EU. National barriers have to a large extent been removed, allowing competition to flourish beyond former national boundaries. This has enabled European companies to become more efficient and innovative, increasing their competitiveness both within the EU and in the global economy. Importantly, the efficiency gains that flow from the Single Market benefit not just industry but in particular also the European consumer, who has access to better products at lower prices. As a result, the Single Market has created significant additional welfare in the EU. EGBA therefore strongly agrees that consumers and business should have access to services from everywhere in the EU. A fragmented market allows inefficiencies and unnecessary costs to be maintained to the detriment of both consumers and business.

The fragmented online gambling market negatively impacts on the protection of consumers of online gambling services. With a significant number of Member States having introduced national licensing schemes for the provision of online gambling services, in certain cases also coupled with stringent product restrictions, the attractiveness of these services is significantly lower than similar services offered online by providers from outside the EU. As consumers can and will choose online services that are more competitive, the effect of the fragmented market is that consumers will be pushed out of the regulated environment and attracted to the unregulated non EU market, often without any consumer protection. We, therefore, believe that the protection of gambling consumers should not rely on geoblocking, but instead that there should be a high level of consumer protection that is equal for all consumers, regardless of where they live in the EU.

These affirmations are backed by the “Cost of Non-Europe” study carried out by the European Parliament,[1] which found that “Overall, the CoNE from the absence of a single market in gambling and online gaming is estimated to be in the region of €5,560 million per annum, which is composed of €5 billion in potential savings for consumers from the introduction of cross-border competition and €560 million in social costs from inadequate protection of problem gamblers.”[2]

EGBA strongly opposes fragmentation of the internal market and instruments such as geoblocking that are designed to (artificially and ineffectively) fragment the digital market along geographical boundaries.

[1] “The Cost of Non- Europe in the Single Market”, European Parliamentary Research Service (2014), available at: http://www.europarl.europa.eu/EPRS/EPRS_STUDY_536357_CoNE_Single_Market_V.pdf

[2] Page 56

2. Which forms of geoblocking and other geographically- based restrictions do you consider as creating significant obstacles to the single market?

	I strongly agree	I agree	Neither agree nor disagree	I disagree	I strongly disagree
Blocking any access to websites across borders, thereby denying access to information, comparisons of service or product ranges and prices), with or without rerouting to 'national' websites	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allowing access to websites and offers across borders but denying the possibility to complete the order or purchase after obtaining information on the geo-location or residence of the user;	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allowing access to websites across borders but denying the possibility to download digital products across borders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allowing access to websites and offers across borders but denying the possibility to pick up, deliver or ship the goods across borders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differentiating prices or other conditions on the basis of the nationality of the customer	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differentiating prices or other conditions on the basis of the country of residence of the customers or the location from which they are ordering or accessing the services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Denying access to additional services on the basis of the country of residence of the customers or the location from which they are ordering or accessing the services (e.g. loyalty cards, discounts, reduction vouchers)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Denying access to after-sales services on the basis of the country of residence of the customers or the location from which they are ordering or accessing the services (e.g. maintenance and repair of the product, customer support)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other forms	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

As previously said the fragmentation of the online gambling market in the EU leads to negative consequences for both the economic welfare and level of consumer protection of EU consumers. The current regulatory fragmentation does not protect or help EU consumers but rather pushes them to the unregulated offer from outside the EU. The (geo-) measures that some national regulations require to put in place by law do not actually prevent consumers from accessing the unregulated offer. In this regard, the European Commission stated that "it is questionable whether these blocking systems could produce the expected results, as [...] the online gamblers could escape the internet blocking by changing 'ports' used[...]".^[3] Furthermore, they may lead to unintended consequences such as a shift to the underground industry and the incumbent risk of money laundering.

In fact, the current fragmentation of the single market when it comes to online gambling in the absence of harmonisation coupled with the exclusion of gambling from relevant EU legislation like the consumer protection directive results on different services, including bonuses and discounts, being offered to consumers based on where they live. This problem is not resolved, but rather exacerbated by geoblocking. If operators were enabled to offer their services through the dot com offer, this issue would not occur. A study commissioned by the European Parliament,^[4] the Cost of Non-Europe study, even adds that if a fully-fledged Single Market had been achieved in the field of online gambling, consumers would not only benefit from better prices (betting odds in this case), but also from a more harmonised consumer protection framework. In concrete terms, one of the prerogatives to achieve this Single Market for online gambling is to completely ban geoblocking from the sector.

[3] EC (2011) 6499 on the measure C 35/2010, para 126.

[4]

http://www.europarl.europa.eu/EPRS/EPRS_STUDY_536357_CoNE_Single_Market_V.pdf

Comments

3000 character(s) maximum

3. There are different ways in which geo-blocking and other geographically based restrictions can take place. How would you classify the following barriers?

	Very important	Important	Neutral	Not important	I don't know
Re-routing to a website targeting the home country of the visitor without the possibility to overrule	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Refusing access to a website or an offer based on IP-address (or other technical means allowing to determine the geo-location of the user)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Refusing access to a website or an offer based on customers' disclosure of their nationality	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Refusing access to a website or an offer based on customers' disclosure of their residence	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Terminating the transaction based on customers' disclosure of their residence	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Refusing foreign credit cards or other foreign means of payment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Linking access to, purchase or download of digital goods or services to the postal address of the customers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Linking access to or purchase of non-digital goods or services to the postal address of the customers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of disproportionately higher shipping costs based on the location of the customer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing a format for address, postal codes or phone etc. which is specific to certain countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other barriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Have you experienced geo-blocking or other geographically-based restrictions in your business (B2B)?

- Yes
- No

5. Have you applied geo-blocking or other geographically-based restrictions in your business (B2B and B2C)?

- Yes
- No

If yes, to achieve which aim:

When EGBA members apply geoblocking, they do so in order to comply with the applicable national laws.

6. If you apply restrictions or different conditions to customers located in different EU countries, in which circumstances do you provide them with an explanation?

- We give an explanation upon request of the customer
- We provide a full explanation upfront on our website, in publicity material or in the shop
- We provide explanation to consumer associations if they ask us individually
- We have not been asked any explanation

7. In your opinion, what - beyond legal constraints - might be considered other objective factors justifying geoblocking or, more generally, different treatment of users and customers based on their residence or geo-location?

3000 character(s) maximum

As explained above, even if national law requires geoblocking to be applied, EGBA considers it to be an ineffective tool to achieve public policy objectives. Geoblocking is only a token measure that does not address the essential underlying problem, which is that only a sufficiently attractive regulated offer can channel the consumer to the regulated offer, not repressive measures such as geoblocking, which hinder the free provision of digital services across the EU, one of the cornerstones of the European Digital Single Market.

8. In your opinion, in which circumstances should geo-blocking, refusing a transaction or, more generally, different treatment of users and customers based on their residence or geo-location not be justified?

	Not justified	Neither justified nor unjustified	Justified	I don't know
Cross border delivery is easily accessible and the customer is prepared to pay additional shipping costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The customer is prepared to organise the delivery	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
There is no additional cost linked to delivery or other administrative burden (for example: simple downloading of digital content, the customer will use the service/good in the country of the trader or of its supplier)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Customers are prepared to take the risk of concluding a transaction in the language of the trader	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The means of payment used by the customer is internationally valid and accepted in the traders' country	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The brand of the physical store (franchisee or subsidiary) also exists in the customer's country	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The trader advertises its products or services also in the customer's country	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The trader has a website targeting specifically the country of the customer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The customer is moving to the seller's country but is not registered yet	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Nationality can never be a justification	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Residence or location of the customer can never be a justification	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other circumstances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify

EGBA considers it unjust that consumers who created an account with a licensed operator in one Member State would not be allowed any more to access their account when relocating to or travelling in another Member State. This goes against the most fundamental principles of the Single Market. Consumers having a bank account in one Member State but living in another Member State are still capable of accessing their accounts, irrespective of whether the original bank has subsidiaries in the country of residence of its client. There are no clear principles why this should be any different in the area of online gambling as long as strict consumer protection rules are being respected by the operators in question.

Please explain

3000 character(s) maximum

There is a large degree of uncertainty as to what can be understood as illegal offer / illegal content as regards online gambling and betting. A Member State may consider that gambling content is illegal under its national law and initiate a notice for its removal. However, it is important to note that the relevant national law may be incompliant with EU law, thus rendering enforcement of national law illegal. The EU institutions have tried to deal with this problem, and, in this regard, the Spanish EU Presidency (2010) came up with the conclusion that illegal gambling is "gambling in which operators do not comply with the national law of the country where services are offered, provided those national laws are in compliance with EU treaty principles". However, even this definition is problematic; ISPs cannot be required to assess the compliance of a given gambling national regime with EU Law.

9. What should constitute elements of a policy response at the EU level on unjustified geoblocking and other geographically based restrictions?

	I strongly agree	I agree	Neither agree nor disagree	I disagree	I strongly disagree
More transparency: companies should have the obligation to make clear before the (trans)action the detailed, objective and verifiable reasons why they treat customers differently based on their residence or nationality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

More transparency: companies should have the obligation to explain upon request the detailed, objective and verifiable reasons why they treat customers differently based on their residence or nationality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Rules including a list of reasons that may never justify treating domestic and foreign users differently	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Rules including a closed list of objective and verifiable reasons that may justify treating domestic and foreign users differently	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Rules banning ways and means of discriminatory geo-blocking and other restrictions according to your ranking in question 3 above	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Banning the discriminatory blocking of access to websites across borders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules imposing on traders to obtain consent of users/customers prior to automatic rerouting to another website (including another language version of the same website)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules requiring traders to accept cross-border transactions from users/customers from throughout the EU under the same conditions as those applied to users/consumers of the 'home' country of the provider	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Rules requiring traders to accept cross-border transactions from users/customers from throughout the EU under conditions reflecting the additional administrative costs or burdens resulting from the cross-border transaction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Rules requiring traders to accept cross-border transactions from users/consumers from throughout the EU and to provide delivery cross-border if the users/customers are willing to organise themselves the delivery and cover the additional shipping costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules prohibiting traders to refuse the cross-border download of digital products (such as software or video games)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules applicable only to online transactions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Rules applicable only to physical purchases and orders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other elements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. In your view should SMEs, particularly micro enterprises, be exempted from regulatory measures in this context?

- Yes
- No

If yes, under which circumstances?

11. In your view what would be the best policy instrument (or combination thereof) to intervene in this context at EU level?

A clear ban on geoblocking in a legal text.

12. How can effective implementation best be ensured?

	I strongly agree	I agree	Neither agree nor disagree	I disagree	I strongly disagree
Monitoring and enforcement by the European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring and enforcement by national authorities (e.g. consumer protection authorities or competition authorities)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
More effective cross-border cooperation mechanism between national authorities to ensure that rules against unjustified restrictions can be enforced within the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
By alternative dispute resolution bodies (ombudsman, online conciliation services, by (national) European Consumer Centres etc. for example)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

Given the cross-border nature of the geoblocking, it should primarily be the European Commission that should be in charge of ensuring that a properly functioning Digital Single Market fit for purpose to the technologies of today and tomorrow is in place.

Or other existing best practices that you are aware of including self-regulation of companies) – please give examples

3000 character(s) maximum

13. From a business perspective, what would be the overall impact of addressing geo-blocking and other geographically based restrictions?

	Very positive	Somewhat positive	Neutral	Somewhat negative	Very negative	I don't know
For my business sector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For the economy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For cross border e-commerce	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For cross border trade generally	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain why/which opportunities?

3000 character(s) maximum

Removing national barriers and geographically based restrictions would integrate a wide range of national markets that are currently fragmented, fostering competition between online gambling operators.

The European Parliament study calculated that the implementation of a harmonised market would positively impact the online gambling sector to tune of €5,560 million per annum. This figure can be broken down to €5 billion in potential savings for consumers from the introduction of cross-border competition and €560 million in social costs from inadequate protection of problem gamblers

14. Can you indicate for each of the possible measures listed what would be the impact (where possible, quantified) in terms of new market opportunities as well as additional costs or burden?

	Very positive	Somewhat positive	Neutral	Somewhat negative	Very negative	I don't know

<p>More transparency: companies should have the obligation to make clear before the (trans)action the detailed, objective and verifiable reasons why they treat customers differently based on their residence or nationality</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>More transparency: companies should have the obligation to explain upon request the detailed, objective and verifiable reasons why they treat customers differently based on their residence or nationality</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Rules including a list of reasons that may never justify treating domestic and foreign users differently</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Rules including a closed list of objective and verifiable reasons that may justify treating domestic and foreign users differently</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>Rules banning ways and means of discriminatory geo-blocking and other restrictions according to your ranking in question 3 above</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Banning the discriminatory blocking of access to websites across borders</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Rules imposing on traders to obtain consent of users/customers prior to automatic rerouting to another website (including another language version of the same website)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Rules requiring traders to accept cross-border transactions from users/customers from throughout the EU under the same conditions as those applied to users/consumers of the 'home' country of the provider</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Rules requiring traders to accept cross-border transactions from users/customers from throughout the EU under conditions reflecting the additional administrative costs or burdens resulting from the cross-border transaction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules requiring traders to accept cross-border transactions from users/consumers from throughout the EU and to provide delivery cross-border if the users/customers are willing to organise themselves the delivery and cover the additional shipping costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules prohibiting traders to refuse the cross-border download of digital products (such as software or video games)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules applicable only to online transactions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules applicable only to physical purchases and orders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other impact	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

3000 character(s) maximum

The European Parliament study calculated that the implementation of a harmonised market would positively impact the sector to tune of €5,560 million per annum. This figure can be broken down to €5 billion in potential savings for consumers from the introduction of cross-border competition and €560 million in social costs from inadequate protection of problem gamblers.

Apart from that, blocking access to websites risks to harm fundamental rights and freedoms such as the freedom of speech as laid down in the EU Charter of Fundamental Rights. Therefore, blocking requires a very careful balance of the rights of content providers versus the public objectives of a particular Member State. However, in many cases this balancing exercise is not being pursued. First of all, in many cases blocking of access to online gambling websites lacks a clear legal basis. Furthermore, blocking has widely been used to take down certain content based on national regulation that is not compliant with EU law.

15. Such impact would, in your view, be mostly on

- my business sector
- economy
- cross border e-commerce
- cross border trade generally

16. If you think that EU measures in this area would impose significant additional burden on traders, which burden do you think of?

- Additional administrative compliance costs
- Additional costs in the area of marketing or web design
- Additional personnel costs
- Additional delivery costs

Other type of additional costs (please specify)

The benefits in terms of competition and consumer protection of removing geoblocking barriers in the online gambling sector would outweigh any potential cost related to such removal.

Other type of burden (please specify)

BG_ Въведение (/eusurvey/files/569c3297-4c50-4bb4-a551-491946ed9c10)

BG_ Декларация за защита на личните данни (/eusurvey/files/7ff56652-aac3-45b1-884e-489769989359)

CS_Prohlášení o ochraně osobních údajů (/eusurvey/files/96c65fdb-2e85-404c-bb2c-694c056e191d)

CS_Úvod (/eusurvey/files/ed4e3ddc-8074-4948-95dd-b88cbd5b7d09)

DA_Databeskyttelseserklæring (/eusurvey/files/e950b5f7-a4de-4441-bb1e-df7850f4777f)

DA_Introduktion (/eusurvey/files/a73782f4-0b31-4ab4-b308-449ba4a73f84)

DE_Datenschutzerklärung (/eusurvey/files/46640fa4-a21a-4617-b5ee-8497301f3262)

DE_Einleitung (/eusurvey/files/c9945790-55fd-4358-84b2-cb96ac9f3565)

EL_ Δήλωση περί απορρήτου (/eusurvey/files/4b9465d4-41a0-4eaf-bc22-cb228d0b9e7f)

EL_Εισαγωγή (/eusurvey/files/82a216da-201f-40fd-b952-f0b707456ba0)

EN_Introduction Text (/eusurvey/files/e09a8b83-a510-4fe7-8870-593a05dc9eb2)

EN_Privacy Statement (/eusurvey/files/c23ca6a8-da34-4823-a8c9-23f073daa3d3)

ES_Declaración de privacidad (/eusurvey/files/fb4c5886-8667-4809-9683-c3a4b3416933)

ES_Introducción (/eusurvey/files/9154f712-b814-4635-8671-bf42a5150e9b)

ET_Isikuandmete kaitse põhimõtted (/eusurvey/files/487d5aec-2ccf-407d-bda9-c4ce203013d6)

ET_Sissejuhatus (/eusurvey/files/552bfc09-8d43-4e7c-a742-436f1f6bcd43)

FI_Johdanto (/eusurvey/files/74433faa-52af-45a7-bcb2-52e6f6424b8a)

FI_Tietosuojaseloste (/eusurvey/files/a2851659-c416-4e99-a3b0-16793d314938)

FR_Déclaration relative à la protection de la vie privée (/eusurvey/files/fbf32d01-94ae-4b5d-bf20-ea6952e16e47)

FR_Introduction (/eusurvey/files/dc9d8dd3-9268-419d-9e73-73149975cbd1)

HR_Izjava o zaštiti osobnih podataka (/eusurvey/files/d5126c7d-c35c-44db-a2dc-852f26cf8dc9)

HR_Uvod (/eusurvey/files/4b1fdb51-46b2-4db9-a316-24f1cde9e5d5)

HU_Adatvédelmi nyilatkozat (/eusurvey/files/c3d339a2-9c81-42dd-84db-0f06a4458f8f)

HU_Bevezetés (/eusurvey/files/2a5a75c9-2117-42d5-ab7b-56e1d05bd9f9)

IT_Informativa sulla privacy (/eusurvey/files/224ce6e0-e844-4cb0-9890-3302faaba799)

IT_Introduzione (/eusurvey/files/a8bd3ae7-42a6-4433-98e4-0d5fd76de652)

LT_Pareiškimas apie privatumo apsaugą (/eusurvey/files/c5bab167-cbc7-49fb-9a89-8c3af2defff3)

LT_Ivadas (/eusurvey/files/0206634e-0ebf-4bbc-bdbf-34231b60629a)

LV_Ievads (/eusurvey/files/b8423779-d6df-4f3c-9fb9-8b7f3f441bae)

LV_Paziņojums par konfidencialitāti (/eusurvey/files/2ab0a84b-dbd8-49e5-b058-ae659bab171a)

MT_Dikjarazzjoni ta' Privatezza (/eusurvey/files/undefined)

MT_Introduzzjoni (/eusurvey/files/7f2d6b62-1a0f-4d19-8d6c-fd92ba1b16ed)

NL_Inleiding (/eusurvey/files/114357ac-c621-4d3e-9e37-bbabf922995c)

NL_Privacyverklaring (/eusurvey/files/7e6e3e72-9bf7-4063-840c-2fb01e10d738)

PL_Oświadczenie o ochronie prywatności (/eusurvey/files/30559dda-9de1-4c4a-9748-0ecc898785a4)

PL_Wprowadzenie (/eusurvey/files/35485924-2bcc-406d-a842-7c22f5bdda92)

PT_Declaração de privacidade (/eusurvey/files/2f759e57-d32e-42a8-8f5e-8964437a00c1)

PT_Introdução (/eusurvey/files/10efba9a-f3bb-4eb0-b696-2c25ea658380)

RO_Declarație de confidențialitate (/eusurvey/files/7e406ee5-b266-4ecd-8356-2121bd1604d7)

RO_Introducere (/eusurvey/files/69f56263-5125-47fa-8ff9-1134cc82bbee)

SK_Vyhlásenie o ochrane osobných údajov (/eusurvey/files/a57e6d58-01d3-4161-bc68-ee42c1a2ec19)

SK_Úvod (/eusurvey/files/0124210c-e806-4e52-8298-72221b373aec)

SL_Izjava o varstvu osebnih podatkov (/eusurvey/files/77c4282b-a266-4f86-830b-b1cb7414a2ce)

SL_Uvod (/eusurvey/files/fd193fb5-6ff5-4338-81e5-e8885d43bdae)

SV_Inledning (/eusurvey/files/7e636307-0080-4dda-8b59-d74000b5b243)

SV_Regler för skydd av personuppgifter (/eusurvey/files/1d3f02d9-8a9b-4f0f-87d7-549a05c1f462)

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