

»» Your quarterly guide to the key issues affecting Europe's online gambling sector

Online Gambling **Focus**

THIS ISSUE Safer gambling and responsible advertising during COVID-19



Leading the way in standards for responsible advertising

By **Vasiliki Panousi**, Manager – EU Affairs, European Gaming and Betting Association (EGBA)

Over the past years, there has been political debate in some European countries about the role of advertising for gambling. Advertising is essential to inform consumers about the gambling websites which are regulated in a country, but it is also how the online gambling sector is visible to the outside world and it needs to be responsible. This requires leadership and recognition that the sector is part of society and it is why EGBA decided to develop a code of conduct which sets pan-European standards for responsible advertising¹ for the online gambling sector.



»» The code establishes common and essential standards for advertising to enhance consumer and minor protection across European countries and focuses specifically on the content of advertising. Volume of advertising is not addressed, not because EGBA does not recognize that volume is a political issue in some countries, but it is not in most European countries. Contrary to the content of advertising, which is obviously relevant in every country, and hence our code focusses on defining responsible content for advertising.

All member companies of EGBA, their contractual affiliates and advertising intermediaries (meaning brand ambassadors, influencers and bloggers) are required to adhere to the code. The code covers all marketing activities across all media platforms, regardless of the technology used, and is intended to be applicable in all EU, EEA countries and the UK.

Introducing essential advertising measures

The code introduces measures on content moderation which outline how gambling advertising should and should not look like and has dedicated rules for minor protection, e.g. no gambling advertising during media broadcasts that are dedicated to minors and no use of cartoons or animated characters which appeal to minors. It also establishes first-of-their-kind measures for social media, through the innovative use of age-screening and age-gating tools, to reduce the exposure of minors to advertising. There are also dedicated chapters for sponsorship arrangements and responsible gambling advertisements, which should always focus on raising awareness of the risks of gambling and provide information about where players can seek help if they need to.

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Vasiliki Panousi, Manager – EU Affairs, EGBA



What makes this code different?

There are four elements which make the code unique. It is the **first set of pan-European self-regulatory measures** on responsible gambling advertising and has been developed in the context of the EU Audiovisual Services Directive, which specifically encourages the use of self-regulation in advertising, including for gambling. The code contains **first-time rules specifically for social media**, an issue which has not been addressed in any pre-existing code, and also includes concrete examples of **content moderation**. Finally, the code itself foresees **monitoring and enforcement** of its measures.

Adherence and promotion of the code

Other online gambling companies, who are not members of EGBA, are invited to sign up to the code, providing they comply with the entirety of its measures. National online gambling associations or associations that represent the media sector are also invited to endorse the code and promote it among their members. We are pleased to have already received expressions of interest from several gambling companies, the support of other media associations, while three national online gambling associations have already endorsed it. The code can be updated any time in the future to correspond to societal trends or technological developments and this will be done by EGBA and its members, in collaboration with national advertising and gambling authorities. It is important to note that the code will not replace any existing self-regulatory code or legislation at national level but is designed to complement and reinforce them.

Effectiveness of the code and enforcement

Monitoring is extremely crucial when we talk about effective self-regulation and the code itself foresees the commitment of monitoring on a frequent basis by an independent body. We are already discussing with our members on best to proceed with monitoring and it could start with a certain amount of countries and certain aspects of the code, depending on the need. To ensure the effectiveness of the code, we asked the European Advertising Standards Alliance (EASA)² to conduct a gap analysis exercise on how the code compares with the existing self-regulatory and legislative measures on gambling advertising in 15 European countries. EASA's analysis³ found that some aspects of the code are stricter and more detailed than national rules, especially in relation to social media and minor protection. It also found the code to be consistent and not contradictory with existing self-regulatory or legislative measures and that it could be implemented in 9 out of the 15 countries that were assessed.

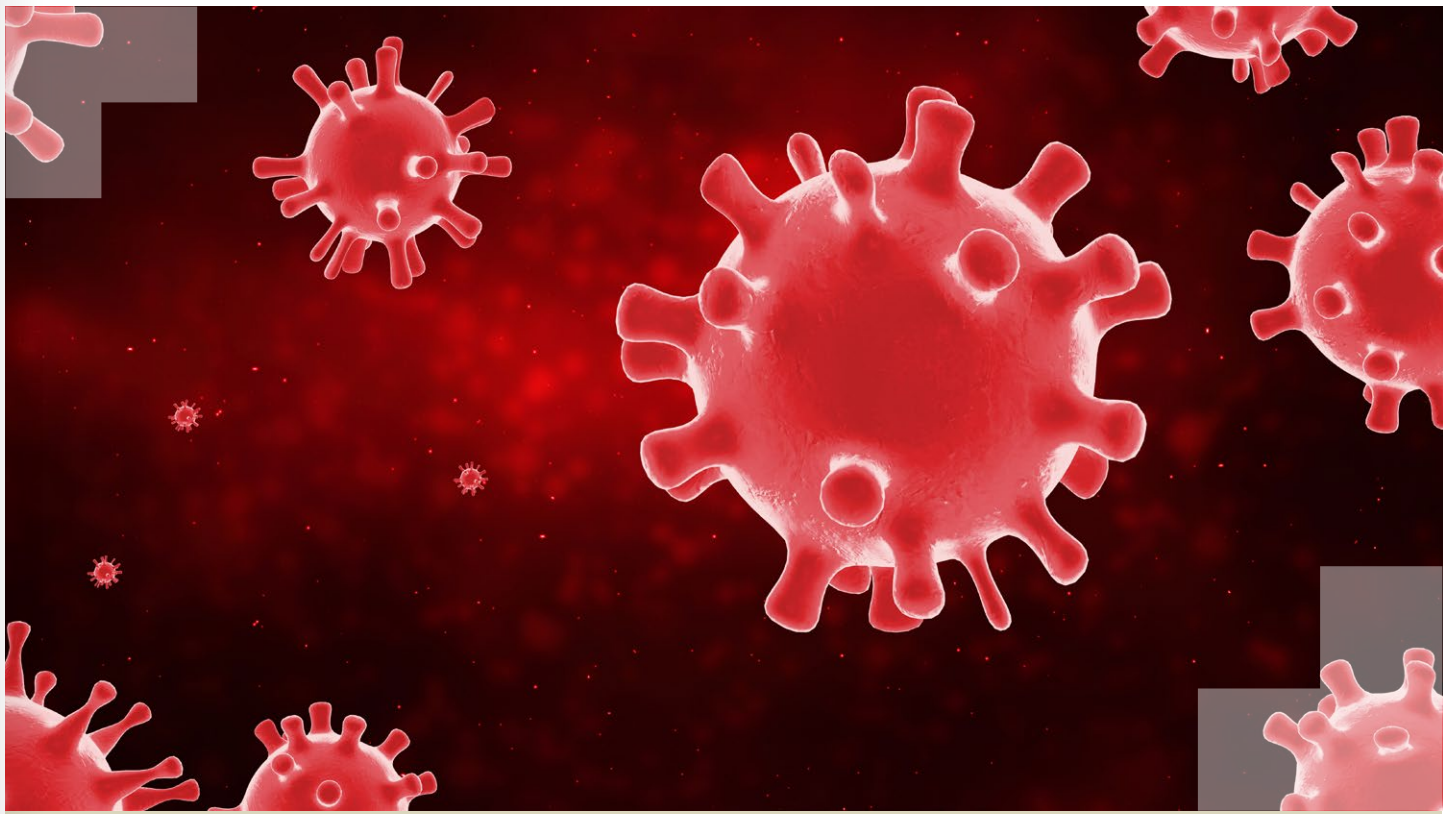
Finally, this new code sets essential standards for responsible gambling advertising in Europe and is part of EGBA's commitment to encourage Europe's online gambling sector to conduct its advertising activities in a safe and responsible way. We urge other gambling companies to join forces with us, sign the code and demonstrate their commitment to responsible advertising.

References

¹ Code of Conduct on Responsible Advertising for Online Gambling, EGBA (2020)

² European Advertising Standards Alliance (EASA)

³ New Analysis Shows EGBA's Responsible Advertising Code Can Reinforce National Advertising Rules, EGBA (2020)



Safer gambling is more important than ever during the coronavirus

By **Maarten Haijer**, Secretary General, European Gaming and Betting Association (EGBA)

Ensuring Europe's online gamblers can play in a safe environment is an essential objective every day of the year: we all want customers who can enjoy a bet in a safe and responsible environment. The vast majority of customers do so, but some gamble too much, or too often, and need extra protection. And these past weeks, as millions of Europeans isolate at home due to the coronavirus lockdowns, safer gambling is even more important than ever.

This has been a time of stress and financial uncertainty for many. And in these circumstances, there are concerns of an increase in the risk of addictive behaviours, including those related to gambling. Fears of an "explosion of online gambling" even led some European countries to introduce specific restrictions on online gambling.

We believe that most of these restrictions, aimed at protecting citizens, are well intentioned and we understand that politicians seek to reassure and protect their citizens in times of difficulty. However, the majority of restrictions introduced are not evidence-based and could do more harm than good by making black-market websites even more attractive to play on, compared to licensed and regulated ones. These black-market websites are hosted and run from outside the EU and apply hardly any social responsibilities to their customers (and worryingly, some even advertise themselves as a way to bypass self-exclusion registers).

At the beginning of the coronavirus, we anticipated activity and revenue in the licensed online market would decline substantially in the absence of major sport events to bet on. Sports betting is a huge part of the market and accounted for **44%** of our members total online revenues in 2018. Its absence leaves a huge hole in the market - and increases in less popular and marginal game verticals, like poker, e-sports or casino, cannot compensate for this loss.

This has been corroborated by recent market updates - both from the major online gambling companies and national gambling authorities. The data available shows there has actually been a significant decline in online gambling during the coronavirus lockdowns - mainly due to the cancellation of major sports. According to the respective national authorities, in Belgium there has been a **38% decline¹** in traffic to licensed gambling websites, in Denmark there has been a **60% drop²** in online gambling and in Sweden, there was a **6% decrease³** in online gambling.





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Maarten Haijer, Secretary General, EGBA

➤➤ The UK authority also found that **67% of citizens have not gambled**⁴ during the coronavirus and, of those that had, three quarters had not spent more time or money on online gambling.

This significant drop in online gambling, including in those countries which did not introduce any restrictions at all, is contrary to what many predicted and questions the effectiveness of the restrictions imposed on online gambling in some countries. That being said, we fully recognize that the more vulnerable gamblers could be susceptible to spending more money or time on online gambling in these circumstances. That's why we recently issued guidance on how online gambling companies can promote safer gambling and responsible advertising during the coronavirus lockdowns and we have been urging gambling companies to apply these essential measures.

Thankfully there are many tools available to help gamblers manage their online gambling in a responsible way. But the onus should not only be on the customers to gamble responsibly, online gambling companies should also be mindful of their social responsibilities at this difficult time and step up their safer gambling efforts, particularly when it is clear that a customer is not managing their own behaviour in a responsible way.

We urge online gambling companies to apply common sense. Most companies already have safer gambling tools at their disposal, and they should have these tools visible, accessible and easy-to-use for their customers, and step up their monitoring of customers and, when necessary, their targeted interventions to those at risk of problem gambling.

One-size-fits-all restrictions, like advertising restrictions or blanket deposit limits, are not sufficiently targeted to address those customers who actually need help, but rather will jeopardise their consumer protection by making unlicensed websites more attractive to them, compared to licensed ones. We must remember that gambling is human behaviour, consumers will always make their own choices and effective regulation needs to be based on what works well, not what makes good headlines.

References

- ¹ [Third less visitors on gambling websites, HLN news \(2020\)](#)
- ² [Danes gamble less during coronavirus crisis, Danish Gambling Authority \(2020\)](#)
- ³ [Interim report, Swedish Gambling Authority \(2020\)](#)
- ⁴ [Covid 19 and its impact on gambling – what we know so far, Gambling Commission \(2020\)](#)

EGBA | European Gaming & Betting Association

The European Gaming and Betting Association (EGBA) is the Brussels-based trade association representing the leading online gaming and betting operators established, licensed and regulated within the EU. EGBA works together with national and EU authorities and other stakeholders towards a well-regulated market that provides a high level of consumer protection and takes into account the reality of the digital economy and consumer demand.

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