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IPRH REVIVES DEBATE ON ILLEGAL GAMBLING. BLACK BOOK OF ILLEGAL GAMBLING REVEALS NEW SCOPE OF THE PROBLEM AND PRESSURE ON STATE ADMINISTRATION

The beginning of November at the Institute for the Regulation of Gambling (IPRH) was devoted to the topic of illegal gambling. On Tuesday, November 4, 2025. The IPRH presented the results of two expert studies and a new publication, *The Black Book of Illegal Gambling*, which summarizes the current situation on the black market. The event attracted the attention of the media and politicians, bringing the topic back into public debate after a long period of silence.



The press conference provided data that had been lacking in Czechia

The press conference was attended by experts from Slovakia and the Czech Republic who have been monitoring developments in the field of illegal betting for a long time. Robert Klobucký from the Institute of Sociology of the Slovak Academy of Sciences and Aleš Rod from the Center for Economic and Market Analysis (CETA) presented new research mapping the extent of illegal gambling and its impact on the state and the players themselves.



Jan Řehola spoke on behalf of the IPRH, while the business sector was represented by Petr Čelechovský (BONVER WIN), Jakub Kolesa (Fortuna Game), Zdeněk Brázdil (Tipsport) and, via video, Aleš Veselý (SAZKA).

There was considerable media interest – reports from the press conference were broadcast by Česká televize and CNN Prima News that same evening. Several articles were subsequently published in major news outlets. The topic was further supported by MP Patrik Nacher, who shared the main findings on social network X.

New trends: streaming illegal sites, Telegram groups, and crypto casinos

At the event, the IPRH presented a short video summarizing the latest trends in illegal gambling. In addition to traditional forms, it highlights, for example, streaming promoting illegal online casinos, betting advice, and rapidly growing activity on Telegram. It pays particular attention to so-called crypto casinos, which, thanks to their anonymity, are becoming a growing problem for regulators abroad.

The presentation also included a set of ten measures that, according to the IPRH, could increase the



effectiveness of the fight against illegal gambling. The institute also published a visual overview of the main figures.

The aim is to persuade the state to take concrete steps

The IPRH has long been warning that the extent of illegal gambling in Czechia is growing, while accurate

data and coordinated action by state institutions are lacking. That is why the IPRH is seeking to establish a working group that would bring together all key players – from regulators and security forces to legal operators.

According to initial reactions from the Ministry of Finance, the Customs Administration, and the Office of the Government, there is considerable interest in the establishment of such a group. The Institute considers this response to be one of the main successes of the week. The data show that the problem of illegal gambling cannot be ignored. Without coordinated action by the state, the situation will continue to escalate.

GOVERNMENT PROGRAM STATEMENT: MENTAL HEALTH COMES TO THE FOREFRONT. GAMBLING AWAITS CONCRETE STEPS



The future government has published a draft policy statement that indicates a significant change in the direction of public policy in the coming years. While the economic part of the document sticks to the expected guidelines—no tax increases, an emphasis on more efficient collection of taxes and adjustments to the functioning of the state—the topic of mental health is surprisingly coming to the fore. And to an extent that is unprecedented in Czech politics.

On the contrary, the area of gambling remains in the shadows. The document mentions it only in very general terms, and no specific regulatory or preventive measures have been included in the text so far. However, according to information from the coalition, the chapter is not closed and some of the wording may still change.

Mental health care reform to be relaunched

The government's priorities in this area are clear: *the cabinet wants to "restart the state-led process of mental health care reform."* The document declares a strengthening *of* capacities in the system, especially for services for children and adolescents, which in recent years have faced long-term staffing and financial underfunding.

It significantly strengthens the role of schools. The proposal envisages an increase in the number of psychologists, special educators, and teaching assistants. The government also plans to strengthen the prevention of bullying and cyberbullying and to focus on programs that promote the mental resilience of students.

Compared to previous policy statements, this is one of the most significant shifts. For the first time, mental health is becoming a topic that permeates not only healthcare, but also education and the prevention of risky behavior.

Addictions are no longer limited to alcohol and drugs. The government is targeting the digital world

The government's new perspective is also reflected in addiction prevention. The document expands the definition of risky behavior to include the digital environment and draws attention to the problem of excessive use of mobile phones, social networks, and online games in schools.

The cabinet wants to equip schools with methodologies and capacities that will enable them to better manage these risks. According to the proposal, mobile phones should only be allowed in class with the teacher's consent — a step inspired by measures in a number of European countries.

The government also declares that it will continue to prevent traditional addictions, i.e., alcohol, tobacco, drugs, and gambling. However, no specific steps have been presented yet.

Gambling: general wording, details missing

The chapter on gambling is one of the least developed in the document. The government mentions strengthening the powers of the Customs Administration to improve the collection of excise duties and market supervision, but that is practically where the list ends.

The draft lacks any specific measures concerning advertising regulation, measures for the online environment, prevention of risky gambling, or procedures against illegal operators—areas that have been among the most discussed in recent years.

According to information from coalition negotiations, the chapter is still not definitively closed and may still be amended during the preparation of the government program. Unlike the previous government, however, there are currently no working or expert groups preparing the content of the chapter or providing expert input.

Sport as prevention and investment in the future

The sports chapter sets out the ambition to prepare a new law on sport and increase funding for physical activities for children and young people. The government emphasizes that it sees investment in sport as part of addiction prevention and as a way of promoting a healthy lifestyle. At the same time, it supports the principle of multi-source financing.

What the document implies

The policy statement appears to be a mixture of expected economic measures and two social priorities that the government is placing at the forefront: mental health and the prevention of risky behavior.

While the first topic is elaborated in detail and indicates an ambition to truly change the functioning of schools, healthcare, and community services, gambling remains on the sidelines. For regulators and operators, this means one thing: significant changes may come, but the text does not yet take them into account.

The final form of the chapter on gambling will therefore likely take shape over the coming weeks, when further political and expert discussions will take place.

JOINT ACTION AGAINST ILLEGAL ONLINE GAMBLING: BRATISLAVA WORKSHOP BRINGS CONCRETE PROPOSALS AND NEW IMPETUS FOR COOPERATION



On **October 17, regulators, banks, payment service providers, and gambling operators gathered in Bratislava for an expert workshop to jointly seek effective tools to combat illegal online gambling. The result is a proposal for a four-pillar action plan and agreement on the need for close cooperation between the public and private sectors.**

The workshop, entitled **"Joint Action Against Illegal Online Gambling in Slovakia,"** was organized by **the Institute for the Regulation of Gambling (IPRHH)** and held in the conference rooms of the DoubleTree by Hilton hotel. The aim of the meeting was to open a constructive dialogue between key players – from the state regulator to financial institutions and legal gambling operators – and to seek solutions to make the fight against illegal websites more effective.

Representatives from all key areas took part in the panel discussion:

Roland Štadler for the banking sector, **Lucia Mihalíková**

and **Gabriela Longauerová** for **the Office for the Regulation of Gambling (ÚRHH)**, **Dávid Demian** and **Zuzana Smržová** (both from Tipsport) for operators, and **Radoslav Szucs** for payment service providers. The discussion was moderated by **JUDr. Dávid Lenčéš, director of the IPRHH**.



Payment gateways in the spotlight

The liveliest debate developed around **financial flows to illegal operators**. Banks pointed out that although they can identify transactions using the MCC 7995 code, which indicates gambling, in practice this mechanism encounters a number of limitations – from circumventing the code to using foreign intermediaries.

A proposal was therefore made that **banks and payment institutions** should **follow a whitelist of legal operators** maintained by the ÚRHH. This approach would make it possible to distinguish more accurately between legal and illegal entities and at the same time reduce the risk of transactions being blocked in error.

Representatives of the financial sector also agreed that **the issuance of a methodological opinion by the National Bank of Slovakia** could be of significant help. A clear definition that the intermediation of payments to illegal gambling websites constitutes aiding illegal activity could provide long-awaited regulatory certainty.

Website blocking: slow, but with hope for improvement

Another key topic was **the blocking of illegal websites**. According to the ÚRHH, the process is still relatively slow – adding a website to the so-called blacklist can take up to three months because it must also be approved by a court. However, **the** planned **amendment to the Gambling Act** should eliminate the need for court involvement and thus **significantly speed up the blocking process**.

The Office is also preparing **an automated tool for evaluating the fulfillment of obligations by internet providers**, which will serve as a basis for supervision. The tool for searching for illegal websites is not yet being prepared, but the new methodology should enable more effective supervision.

The problem **of circumventing blocks** remains, especially at the second-level DNS. Participants in the discussion pointed out that with the arrival of new versions of mobile operating systems, such as **iOS 26**, blocking may be completely ineffective. In the future, **legal regulations relating to manufacturers of mobile devices and operating systems** may also be necessary.

Trust certificate as a way forward for legal operators

An interesting proposal that emerged from the discussion was **the introduction** of **a uniform certificate**



of trust for legal gambling operators. The certificate would contain information about a valid license and serve as a visible sign of trustworthiness.

By clicking on it, players could be redirected to the ÚRHH website, where they could verify that they are playing on a licensed website. This system could have **a** significant **preventive effect** – it would increase public awareness and limit the scope for illegal operators, who would not be able to obtain such a certificate.

Action plan: four pillars of coordinated action

In order to translate the results of the discussion into concrete action, the IPRHH presented a draft **action plan** that combines technical, procedural, control, and communication tools.

1. **Technical pillar** – digitization and automation of processes, including the introduction of an API for sharing whitelists and blacklists between the ÚRHH and

financial institutions.

2. **Process pillar** – creation of a working group for blocking and payments to coordinate procedures between the regulator, banks, and providers.

3. **Control pillar** – introduction of joint reporting and evaluation of the effectiveness of measures, such as measuring the speed of blocking and recurrence of illegal domains.

Communication pillar – information campaign targeting banks, payment service providers, internet operators, and players, supplemented by memoranda of cooperation.

New working group as the next step

At the end of the workshop, the IPRHH announced its intention **to set up a new working group** that will systematically address the issue of combating illegal online gambling. The aim is to develop specific measures and create a permanent platform for cooperation between the public and private sectors.

"Through joint efforts, we can strengthen market protection, increase transparency, and contribute to the creation of a fair and safe environment for both legal operators and players," concluded IPRHH Director **Dávid Lenčéš**.

POLAND AND ROMANIA HAVE BANNED THE POLYMARKET PLATFORM. ONLINE BETTING INNOVATION CONTINUES TO OUTPACE REGULATION

Romania and Poland have joined the group of countries restricting access to the **Polymarket** platform. Regulators have blacklisted it because it allows bets to be placed on real events without the necessary license. The case reopens the question of how states should respond to new forms of "gamified" financial services and crypto projects that circumvent traditional gambling regulation frameworks.

Prediction market or illegal betting?

Polymarket was created as a decentralized platform built on blockchain, where users can trade on the outcomes of various events – from elections to economic indicators. Its creators present it as a tool for collective prediction of reality, not as a gambling product.



However, regulators see things differently. **The** Romanian **Gaming Authority (ONJN)** and **the Polish Ministry of Finance** have designated Polymarket as an illegal betting platform and ordered it to be blocked. **Belgium, France, and Singapore** have taken similar steps, warning of the unclear legal status of these services.

Innovation moves faster than the law

The Polymarket case shows how difficult it is for the law to keep up with rapid technological developments. Online gambling, cryptocurrencies, and financial products based on gaming elements are intertwined to such an extent that the line between investment, gaming, and betting is often blurred.

While operators take advantage of looser interpretations, national regulators only react after a given model has become widespread. However, according to experts, this approach is not sufficient in the long term.

A competitive legal market as a means of preventing gray areas

Instead of constantly "chasing" every new platform, regulation should focus on **creating a functional and attractive legal market** that offers consumers modern and secure products.

"People often resort to illegal operators not because they want to break the law, but because the legal offer is not attractive enough."

However, this also requires **rational taxation and a stable business environment** that allows licensed operators to invest and innovate. If the costs of legal operation are too high, the market will naturally shift to the gray zone.

SWEDEN TO BAN GAMBLING ON CREDIT. RESPONSE TO GROWING INDEBTEDNESS OF THE POPULATION.

In **Sweden, people will no longer be able to gamble with borrowed money.** A new law, which will come into force on **April 1, 2026**, prohibits the use of credit cards, overdrafts, and loans for gambling purposes.

The aim is to prevent situations where players take out loans to continue gambling or to pay off previous losses.

No more gambling with borrowed money

Under the new legislation, **gambling operators and their partners** will **be prohibited from processing any debt-financed payments**. The ban applies not only to credit cards, but also to consumer loans, deferred payments, and bank overdrafts.

Companies operating gambling in Sweden will have to implement **technical blocks on credit payments** and will not be allowed to cooperate with credit companies offering similar services.

"The new rules apply to all forms of gambling, whether it's online casinos, betting, or lotteries," the government said.

Exception only for charitable lotteries

The law allows for one exception: gambling that **serves the public good**, such as charity lotteries. These cases will be decided by the regulator **Spelinspektionen**, which will also gain broader supervisory powers.

Response to record debts

According to **Kronofogden**, Sweden's debt collection agency, consumer debt reached a record **SEK 138 billion (over $14 billion)** in January 2025.

A special government investigation showed that a significant portion of these debts are related to gambling. Research **by the** Swedish **Public Health Agency** also revealed that **3 to 4 percent of the population aged 16-84** have gambling problems. Among people who regularly play slot machines or casino games, the proportion of problem gamblers is as high as **40 percent**.

New powers and sanctions

Spelinspektionen will be responsible for enforcing the ban and will have the right to impose **heavy fines, suspend operations, and revoke licenses**. **Finansinspektionen** (the financial regulator) and **Konsumentverket** (the consumer agency) will also be involved in monitoring compliance with the rules.

According to the government, the measure is intended to prevent gambling on credit and contribute to greater stability in the licensed market.

Return to a previously rejected effort

The ban on gambling with borrowed money is not new in Sweden. The first proposal appeared in 2019, but the rules at the time were limited—the ban only applied to credit cards with licensed operators.

The subsequent proposal from 2024 did not pass due to ambiguities in the definition of credit. This time, however, the government has broad political support and the approval of the regulator.

Sweden tightens regulations

The ban on gambling on credit is the next step in a series of measures to tighten the rules for gambling. Recently, the government also closed loopholes in the law that allowed some companies to target Swedish players through foreign websites and currencies.

Sweden is thus becoming one of **the most strictly regulated gambling markets in Europe**. Experts expect other Nordic countries to follow suit in the near future.

DENMARK TIGHTENS GAMBLING REGULATION. ADVERTISEMENTS WILL DISAPPEAR FROM LIVE BROADCASTS, FREE BONUSES WILL END.



The **Danish government has adopted a comprehensive package of measures that significantly changes the rules for the promotion and operation of gambling.** The new legislation, known as *"Spilpakken 1,"* introduces, among other things, **a ban on gambling advertising during live sports broadcasts and restricts the use of bonuses and marketing aimed at young people.**

The ban applies to the 10 minutes before the start of a sporting event and 10 minutes after its end, and also affects the display of odds or betting logos in stadiums. Influencers, celebrities, and anyone under the age of 25 will disappear from advertisements entirely. The new rules will take effect no later **than January 1, 2027**.

"This is the beginning of a confrontation with the gaming industry, which has been allowed to take up too much space for too long," said Tax Minister Ane Halsboe -Jørgensen, who pushed the package through. *"To prevent entertainment from becoming an addiction, stricter rules and sustained political effort are needed."*

Protection of children and ban on "free-to-play" bonuses

The package also includes **a ban on "free-to-play" welcome bonuses**, which attracted players to register without having to make a deposit. Gambling advertising will also **be banned on public transport and within 200 meters of schools and other educational institutions**.

The amendment to the Danish Gambling Act also includes the requirement **for age filters on online advertisements** so that gambling content is not displayed to persons under the age of 18.

The changes will be accompanied by increased investment in addiction treatment. Gambling prevention centers will receive over DKK 20 million (approximately EUR 3 million) over the next five years.

Response to growing problems

The Danish government justifies the changes by citing the growing number of people struggling with gambling problems. According to official data, **up to half a million Danish adults** had **some form of problem gambling** in 2021, double the number in 2016.

Approximately **30,000 people** have a serious addiction, and another **25,000 children and adolescents** are directly affected by gambling.

According to the minister, this is a clear signal that the state must act. *"With this package of gaming measures, the government is taking an important step towards a more responsible gambling market. But the work does not end here,"* added Halsboe-Jørgensen.

Strengthening the powers of the regulator

The package also strengthens the powers of the Danish regulator Spillemyndigheden. It will now have broader powers to block illegal online casinos and a clearer framework for calculating fines. At the same time, some administrative obligations for legal providers will be simplified, such as the obligation to submit copies of closed accounts.

Market growth despite regulation

Although the measures are aimed at restricting the promotion of gambling, the sector's revenues in Denmark continue to grow. In August 2025, they reached DKK 714 million, representing both year-on-year and month-on-month growth. The largest growth is reported by sports betting and online casinos.

At the same time, however, the number of people registered in the national self-exclusion system ROFUS is also growing, now including more than 63,000 users.

Stricter rules as a new European trend

Denmark's move is part of a broader European trend in which countries are seeking to curb aggressive gambling marketing and strengthen the protection of minors. Similar bans on advertising and bonuses are also being considered by the Netherlands, Spain, and Belgium.

For gambling operators, this signals a change of era – from an era of expansion to an era of responsibility.

DUTCH REGULATOR LAUNCHES LICENSES FOR SKILL-BASED SLOT MACHINES. AIMING FOR SIMPLER AND SAFER OPERATION



The Dutch Gaming Authority (KSA) has announced the introduction of a new license that will allow operators to offer only so-called *skill machines* – devices whose outcome depends on the player's abilities rather than chance. This is the first step towards separating traditional slot machines from games that are not based on gambling principles.

Until now, there has been a single license available in the Netherlands covering all types of machines, from classic slot machines to skill-based ones. The new system responds to the demands of operators who offer exclusively technical or skill-based games and do not want to be associated with gambling. The KSA is thus opening up space for simpler and faster licensing procedures.

"With this limited operating license, we are meeting the demand of the slot machine market," said the regulator. "Operators who only operate skill-based slot machines have indicated that they would like a separate license from slot machines."

Faster process and less administrative burden

According to the KSA, the new licenses will be granted in a simplified procedure—with a shorter substantive review process and faster administration. Those interested in obtaining them can apply now, and the authority will publish detailed instructions on the procedure in the coming weeks.

Skill machines – typically pinball or other technically demanding games – can only provide players with non-monetary rewards, such as extended play or additional balls. The KSA also reiterated that any machine that does not meet this definition is automatically considered a slot machine.

Reform of gambling machines on the horizon

The introduction of the new license comes at a time when the Netherlands is considering a broader reform of the rules for slot machines. In October, Minister of Legal Protection Arno Rutte announced that he would rely on five KSA research reports in developing the new policy. One of them pointed out that many of the regulations have remained unchanged since 2000.

The reform proposals focus primarily on player protection and the modernization of brick-and-mortar casinos. Analyses show that users still prefer cash payments and have mixed feelings about the new identification measures. Combined with tax changes and pressure for greater transparency, this could lead to the biggest overhaul of the Dutch gaming market in two decades.