



Summary

Three Years of Legal Online Gambling

Evaluation of the Remote Gambling Act

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Summary

With the Remote Gambling Act (Wet Kansspelen op afstand), the offering of online gambling has been regulated. The government aimed to create a responsible, reliable, and verifiable gambling offering and to direct players towards this regulated option. The law was not intended to generate additional demand for online gambling.

We conclude that the Wet Koa has not (yet), to date, contributed to a sufficiently responsible and verifiable gambling offering that would allow us to assert that the policy objectives of online gambling will be achieved in the short or long term. Although the policy has led to a reliable offering and a level of verifiability and oversight that is greater than that of the unlicensed offerings, we believe it cannot yet be described as a responsible offering. Furthermore, the policy has resulted in a large group of new players, including many young adults. Based on the policy and current implementation practice, it can be expected that harm will occur, particularly within this group, as a consequence of the policy.

Introduction of the Remote Gambling Act

The Betting and Gaming Act (Wok) has formed the legal basis for gambling policy in the Netherlands since 1964. The Wok regulates the offering of gambling games and includes rules regarding licensing, supervision, and enforcement. The primary principle is the 'no, unless' principle: offering gambling games is prohibited unless a license has been granted for a specific gambling game mentioned in the Wok.

The Remote Gambling Act (Wet Koa), which came into effect in April 2021, has significantly amended the Wok. From now on, it is also possible to offer online gambling games with a license, which was previously prohibited. An open licensing system has been adopted, meaning that, unlike several other gambling games regulated under the Wok, there is no prior limit on the number of providers that can obtain a license. On October 1, 2021, the first license holders were allowed to become active.

In the explanatory memorandum, the objective of the Wet Koa is described as follows:

With this legislative proposal, the government aims to direct the existing and future demand for gambling via the internet and other future electronic communication means towards a responsible, reliable, and verifiable offering. This will guide players towards a regulated offer with safeguards against gambling addiction and crime, while providing them with an appropriate and attractive selection. The goal of the proposal is to channel the actual demand for remote gambling that currently exists or may arise in the future. The regulation is not intended to generate additional demand for remote gambling.

Since the beginning of the 21st century, three objectives have underpinned Dutch gambling policy: preventing gambling addiction, protecting consumers, and combating crime and illegality. These three objectives form the basis the Wet Koa.

The goal of addiction prevention is threefold:

- To prevent vulnerable groups from experiencing problems due to participation in gambling,
- To timely identify risky gambling behaviour, and
- To moderate gambling behaviour if a player is no longer able to control their gambling, and if necessary, refer them to appropriate care.

Consumer protection encompasses various aspects. Largely, this objective relates to ensuring that consumers receive sufficient information, that they can trust that a game is conducted fairly, and that they can actually withdraw winnings or credits. It also involves preventing individuals under the age of 18 and other vulnerable persons from participating in gambling, as well as preventing advertising activities that encourage excessive gambling behaviour.

Combating crime pertains to criminal behaviour by both providers and players. For providers, this may include manipulating odds or failing to pay out player winnings. There is some overlap with consumer protection in this regard. Regarding crime committed by consumers, it primarily concerns money laundering and match fixing.

The regulatory authority for the gambling sector is the Dutch Gaming Authority (Kansspelautoriteit, Ksa). It oversees compliance with regulations by license holders and enforces against illegal (unlicensed) offerings.

Objective of the research

This evaluation aims to provide insight into the regulation and functioning of the new online gambling market following the implementation of the Wet Koa. It focusses on:

1. the extent and manner of the implementation of measures outlined in the Wet Koa,
2. the intended and unintended effects of the Wet Koa,
3. the attitudes of various stakeholder groups regarding the Wet Koa and its implementation and effects, and
4. the possibilities for improving the current legislation and regulatory practices.

From this objective, research questions have been formulated under the themes of policy logic, implementation practice, effects, and points for improvement.

Methodology

To answer the research questions, a number of research methods were employed. The study extensively utilised existing publications in the field of (online) gambling. It drew particularly from recent population surveys conducted by Ipsos I&O, reports from the Dutch Gaming Authority (Ksa), research from the Consumers' Association, and various parliamentary documents.

In total, interviews were conducted with 35 stakeholders or stakeholder groups related to online gambling policy. This included relevant ministries and the regulatory authority, industry organisations, social organisations, eleven of the 25 active licence holders, and a number of players. A total of eight interviews were held with different departments of the Dutch Gaming Authority. The fourteen gambling providers that were not selected for an interview received a questionnaire to provide written input. This questionnaire was identical to the interview guide for providers. Eight of these fourteen providers made use of this opportunity.

In May and June 2024, a mystery guest study was conducted. For this, a young adult account (under 24 years old) and a 24+ account were created with all 25 active providers at that time. This was used to investigate how the providers implemented various measures within the gambling interface. No gambling was conducted with these accounts.

Finally, two group sessions with stakeholders were organised to test several statements and observations for factual accuracy, consequences, and practicality. Stakeholders from various sectors were present during these sessions and were able to respond to one another.

Limitations of the research

This evaluation has several limitations. The primary limitation is the lack of, or very limited, effect measurement. This is primarily because the law has only recently come into effect, and any potential effects will be very limited in visibility. For example, addiction typically only becomes apparent in the number of requests for help after several years. Additionally, it is challenging to demonstrate these effects in a counterfactual scenario. There is no clear baseline measurement from before the Wet Koa, making it impossible in this evaluation to compare the current situation with what it would have been without the Wet Koa.

Secondly, there have already been changes to the legislation and regulations since the law came into effect. This complicates the measurement of effects from the original policy, as well as from the more recent changes. Furthermore, we did not gain access to player data from the control database (CDB). With this data, it would have been possible

to study the gambling behaviour of players and the interventions of providers. Finally, we only spoke to poker players to gather the player perspective. This group is not representative of the average player.

Outcomes of the research

Policy logic

The objectives of the Wet Koa are, in line with the overall gambling policy, addiction prevention, consumer protection, and combating fraud and crime. These objectives must be achieved by allowing consumers to gamble in a safe and reliable legal offering, rather than in an unsafe illegal one (channelling). In this chapter, we have reconstructed the policy theory based on available documents. Based on this, we draw several conclusions.

Firstly, the objectives of the policy have not been operationalised or have been very limited in their operationalisation. For example, when is the goal of 'addiction prevention' considered to be achieved? Should the percentage of addicted players be lower among players in the legal market compared to those in the illegal market? Or is it about a reduction in the absolute number of gambling addicts in the Netherlands? When policy objectives are not operationalised, it is difficult to measure the extent to which the policy has been successful. The suggestion from addiction prevention experts to broaden the objective to include the prevention of gambling-related harm provides (scientifically and internationally accepted) standards for monitoring this harm through *markers of harm*.

In addition to objectives, there are also measures that have not been concretely defined. This includes the open standards of the duty of care and the measures related to recruitment and advertising. For instance, when does an advertisement encourage excessive gambling behaviour? And when is gambling behaviour considered excessive? Although such matters have been somewhat specified in lower regulations, there remains room for interpretation. The Policy Rules for Responsible Gambling¹ and the ministerial regulation, which came into effect on 3 June and 1 October 2024 respectively, will provide further clarification on this.

Furthermore, the policy contains contradictions. Recruitment and advertising are employed to channel players' demand from illegal gambling offerings to legal ones. Providers are allowed to advertise their legal offerings, but the aim of the law is not to create new demand. However, by permitting advertising, it can be expected that this advertising will also reach non-players, likely leading to an increase in the number of players. This is inconsistent with the objective of preventing gambling addiction: even if providers fulfil their duty of care perfectly, there remains a risk that new players could

¹ In Dutch: *Beleidsregels verantwoord spelen*

become addicted. It seems that insufficient consideration has been given to this issue, particularly regarding the initial allowance of unfocused advertising.

Finally, the context of the Wet Koa has implications for the potential impact of the policy. The measures outlined in the Wet Koa are applied within an open licensing system. This means that providers must compete with each other for market share. These providers are also (primarily) the responsible party for fulfilling the duty of care. However, they have a financial incentive to keep players gambling with them for as long as possible. Preventive interventions may lead players to switch to competitors. From this competitive perspective, it can be expected that providers will fulfil their duty of care in a manner that minimally disrupts gambling behaviour. This does not imply that providers do not wish or cannot fulfil their duty of care effectively, but it may create conflicting interests. Furthermore, an open licensing system with a potentially unlimited number of providers means that measures related to the analysis or limitation of gambling behaviour, such as play limits, may not be (fully) effective unless they are overarching across providers.

Implementation practice

Based on the current implementation practice, we observe, particularly in the area of addiction prevention, that it is not likely that consumers in the licensed offerings are being protected as well as intended. The current measures regarding recruitment and advertising also do not contribute sufficiently to consumer protection. The table below provides an overview of all the measures examined, the assessment of the contribution of the implementation practice to the policy objective, and the main reason for this assessment. The described implementation practice and evaluations apply to the practice as it falls within the scope of this evaluation. Recent tightening of regulations concerning the duty of care and play limits (Policy Rule for Responsible Gambling 2024 and Regulation on Play Limits and Conscious Gambling Behaviour²) have not yet been taken into account.

Table 1. Implementation practice of measures within the Wet Koa.

Measure	Implementation practice	Reason
Addiction prevention		
Representative of addiction prevention	INSUFFICIENT	The representative is underutilised and is insufficiently integrated into the Dutch healthcare system to serve as a bridge.

² In Dutch: *Beleidsregel verantwoord spelen 2024* and *Regeling speellimieten en bewuster speelgedrag*

Measure	Implementation practice	Reason
Development of addiction prevention policy	PARTIALLY SUFFICIENT	The addiction prevention policy is developed based on the legislation and regulations, but it is not standardised and publicly available, and independent experts are not currently involved in its formulation. There are no indications that the addiction prevention policies of licence holders are substantively insufficient. However, the process could be improved.
Duty of care	INSUFFICIENT	The duty of care consists of open standards that are interpreted differently by providers. Additionally, providers have commercial interests alongside their duty of care, making them not the appropriate party for fulfilling these standards.
Information obligations	INSUFFICIENT	Information is not communicated clearly, and the majority of players are not aware of the available support services.
Identification, registration and limits	INSUFFICIENT	The current method of implementing play limits cannot be considered a protective measure, particularly for high-risk gamblers.
Cruks ³	PARTIALLY SUFFICIENT	Cruks largely operates as intended, but the involuntary registration in Cruks as an intervention does not.
Addiction Prevention Fund (Vpf)	PARTIALLY SUFFICIENT	The implementation practice of the Addiction Prevention Fund (Vpf) contributes to the objective but faces challenges regarding the allocation of resources and the availability of data for research on gambling addiction.

³ Centraal Register Uitsluiting Kansspelen

Measure	Implementation practice	Reason
Consumer protection		
Informing players	GOOD	Information about game conditions, the player's balance, and general terms and conditions is available from all licence holders.
Reliable gambling environment	PARTIALLY SUFFICIENT	There are no indications that the gambling environment is unsafe. However, there are opportunities for improvement regarding the certification system.
Protecting personal data	GOOD	There are no indications that there are challenges in this area.
Recruitment and advertising	INSUFFICIENT	Recruitment and advertising contributes to making the licensed offerings attractive and well-known; however, the implementation practice shows that it also encourages excessive gambling behaviour and that vulnerable groups are still reached (intentionally or unintentionally).
Combating fraud and crime		
Identification of players	GOOD	There are no indications that there are challenges in this area.
Prevention of money laundering	GOOD	There are no indications that there are challenges in this area. Additionally, players can only gamble with electronic money at licensed providers.
Preventing match-fixing	INSUFFICIENT	Due to the confidentiality obligation regarding Wwft reports, notifications of potential match-fixing and breaches of sports disciplinary law are not shared with the relevant authorities and sports associations.
Integrity and management of player funds	GOOD	There are no indications that there are challenges in this area.

We would like to point out that we assess the implementation practice of the providers based on the legislation and regulations. We do not compare them with illegal providers or with the *counterfactual* scenario of no legalisation. Illegal providers are not required to adhere to any measures. Even though we assess the implementation practice in several areas as insufficient, it may still be the case that players are better off with the legal offerings than with the illegal ones, but not as well as intended in the legislation and the policy objectives.

Effects

Determining most of the effects of the Wet Koa is currently challenging; many potential effects, such as the impact on the number of individuals with a gambling addiction, are still limited. Furthermore, no monitoring framework and system have been established to compare the observed effects against the intended outcomes. However, based on the implementation practice of the measures related to addiction prevention, combined with the increased number of players, it can be expected that the number of individuals with a gambling addiction will rise, particularly among the young adult group.

The Wet Koa has created reliable gambling environments within the licensed offerings, where the risk of money laundering is very limited. However, the objective of combating match-fixing is likely not achievable with the current implementation practice, but the question remains as to how significant the problem of match-fixing actually is. This cannot be determined.

We observe that the intended channelling rate of 80% has been achieved based on both players and the Gross Gaming Revenue (BSR). Additionally, the Wet Koa has led to several side effects, such as an increase in the number of online gambling players, a normalisation of gambling, an increase in revenues from gambling tax, and a decrease in contributions to harness racing and horse racing.

Conclusions: three years of legal online

With the Wet Koa, the government at the time aimed to *"...direct the existing and future demand for gambling via the internet and other future electronic communication means towards a **responsible, reliable, and verifiable offering**, where players are guided towards a regulated offering with safeguards against gambling addiction and crime. The goal of the legislative proposal is to **channel the actual demand for remote gambling** that currently exists or may arise in the future. The regulation is **not intended to generate additional demand for remote gambling.**"*⁴

⁴ Kamerstukken II 2013/2014, 33996, nr. 3.

Based on the policy logic, implementation practice, and effects, we assess to what extent the Wet Koa has led to 1) a responsible online gambling offering, 2) a reliable online gambling offering, 3) a verifiable online gambling offering, and 4) a channelled demand for remote gambling without generating additional demand. We conclude that the Wet Koa has, to date, (not yet) contributed to a sufficiently responsible and verifiable gambling offering that would allow us to assert that the policy objectives of online gambling policy will be achieved in the short or long term.

Although the policy has resulted in a reliable offering and a degree of verifiability and oversight that is greater than that of the unlicensed offering, we do not believe that it can yet be described as a responsible offering. The policy has also led to a large group of new players, including many young adults. Based on the policy and current implementation practice, it can be expected that harm will occur, particularly within this group, as a result of the policy. This harm is not limited to financial damage but has the potential to result in significant personal suffering. Placing the responsibility for online gambling players in the hands of parties offering an addictive product and competing for market share, thus creating a financial incentive to keep players engaged for as long as possible, has proven to be naive.

Responsible gambling

To ensure a responsible online gambling offering, licensed providers establish an addiction prevention policy and have a duty of care towards the players engaging with their offerings. This duty of care consists of many open standards in the legislation and regulations that providers must interpret and implement themselves. These open standards have led to significant differences between providers. In a licensing system with multiple licence holders, providers must compete for market share. This creates a financial incentive not to implement the duty of care stringently: licence holders with strict interventions may lose their players to competitors. Various studies also indicate that some providers are pushing the boundaries of legislation and regulations regarding their duty of care or simply violating them, for example, by encouraging players in various ways to continue playing or to bet more.

A licensing system—with a potentially unlimited number of providers—also means that measures related to gambling behaviour, such as play limits, may not be fully effective unless they are overarching across providers. When players reach their play limits with one provider, they can simply continue playing with another provider. This places a significant responsibility on the player to adhere to their own limits, which is often too much to ask of high-risk players. One of the key objectives of these limits—namely that a player stops gambling when at risk of excessive gambling—is thereby undermined. An overarching approach would also reduce the fear providers have about implementing their duty of care more stringently than their competitors (namely, that players will leave for a competitor that is less strict). A prerequisite for this is that enforcement of the illegal market is sufficiently effective.

In addition, in recent years, there has been a siloing of the gambling sector. This affects the extent to which the licensed offerings are responsible or can be. The objective of addiction prevention benefits from collaboration between scientists and addiction experts on one side, and gambling providers on the other. In practice, however, there is a clear divide between these two groups, and collaboration is often hard to find. Gambling providers are legally obligated to involve experts in formulating their addiction prevention policy. Some experts participate and are contracted by the sector in an advisory role. However, another part of the sector refuses to cooperate on principle: they disagree with the way in which legalisation has proceeded and how their input has been taken into account sufficiently. Additionally, there are experts who do not collaborate because they want to avoid financial dependence on gambling providers and potential conflicts of interest. As a result, the available knowledge and expertise in the Netherlands regarding (the prevention of) gambling addiction is not effectively utilised.

The effect of legalisation on the number of individuals with a gambling addiction is still limited in visibility. Experts often indicate that it takes five to eight years for someone with a gambling addiction to seek help from mental health care providers. This evaluation, therefore, comes too early to make definitive statements about this. However, based on the implementation practice, the fulfilment of the duty of care, and the increased number of players, it is to be expected that this number will rise. Despite the challenges in the process of involuntary registration, the Cruks has provided a tool that seems effective in protecting individuals at risk of gambling addiction, and it is generally viewed positively.

Due in part to the inadequate fulfilment of the duty of care, the lack of overarching play limits, and the lack of collaboration between addiction experts and gambling providers, we cannot say that there is a responsible gambling offering.

The Policy Rules for Responsible Gambling and the Regulation on Play Limits and Conscious Gambling Behaviour came into effect on 3 June 2024 and 1 October 2024, respectively. With these policy rules, the Ksa provides further details on the legal obligations of the duty of care, including by describing the situations in which providers must intervene or assess whether players can bear the financial consequences of their gambling. The ministerial regulation establishes a deposit limit of €350 per month for adults and €150 for young adults (18 to 24 years old). It is expected that these regulations will improve the implementation of the duty of care.

Reliable gambling

Players must be able to trust that when engaging with a licensed provider, the game is fair, their funds are secure, and they will receive their winnings. This goal has largely been achieved with the Wet Koa. While there are indeed challenges and room for improvement, we see that many measures have an adequate implementation practice, and stakeholders are generally satisfied with them.

In a reliable gambling offering, there is also no room for fraud and crime. The Wet Koa places online gambling licence holders under the Money Laundering and Terrorist Financing (Prevention) Act (Wwft). As a result, licence holders must report suspicious transactions to the Financial Intelligence Unit (FIU). However, the risk of money laundering through online gambling is inherently low because the player's counter-account must be verified by the provider, and only electronic money can be used for gambling. Additionally, the fact that providers report suspicious transactions, which can then be investigated by the FIU for potential money laundering, is an improvement compared to the situation before the Wet Koa.

The Wet Koa also includes measures to prevent match-fixing. The Wwft plays a role here as well, but a less positive one. Due to the confidentiality obligation regarding Wwft reports, notifications of potential match-fixing are often not reported to the authorities responsible for preventing match-fixing or to the relevant sports associations for disciplinary prosecution, especially when a transaction is involved. This has created challenges in information-sharing opportunities (also in relation to privacy legislation) and prosecution in cases of match-fixing.

Verifiable gambling

With the Wet Koa, the Dutch Gaming Authority (Ksa) became the regulator of the online gambling market. The introduction of the licensing system and the data provision from providers to the Ksa theoretically allows for a *verifiable* offering. However, in current practice, there is not a fully *monitored* offering. A challenge in supervising the licensed offerings is that the Ksa currently does not oversee the player interface of licence holders (the part of the gambling interface that is visible only to logged-in players). The Ksa is allowed by law to use mystery guest research to monitor providers, but it is not currently doing so. The Ksa has employment law and privacy-related concerns about having its employees conduct mystery guest research using their personal data, cannot use false identities because there is no legal basis for this, and does not wish to engage external agencies. As a result, the Ksa can only very limitedly supervise the player experience and, for example, the extent to which a provider may encourage excessive gambling behaviour.

When the Ksa identified a violation by a licence holder over the past three years and took intervention measures, this led to the ceasing of the violation in all cases. From this perspective, these interventions by the Ksa are effective. However, there are only limited instances of sanctions being imposed. For example, the Ksa itself has noted that the duty of care is not sufficiently fulfilled by providers but has (as yet) not imposed any (published) sanctions in this area. It may be that providers quickly resort to legal action when disputes arise (according to the Ksa), which would require significant resources from the Ksa. Enforcement is, however, a prerequisite for effective policy, and judicial rulings could provide greater clarity, making enforcement easier in the future.

Part of a verifiable offering also involves the ability to conduct research into online gambling, gambling policy, and the effectiveness of measures. However, researchers and policymakers currently have no or very limited access to player data for this purpose. Licence holders deposit player data in the control database, but this data is only available to regulators for oversight purposes. Moreover, this evaluation could not utilise this player data to map out overarching gambling behaviour.

Channelled demand

The problem with mapping channelling is that it can never be precisely established how many players are engaging with the illegal offerings and how much they are losing there (gross gaming revenue). However, based on the best possible estimates, the intended channelling rate of 80% has been achieved, both in terms of players and gross gaming revenue.

Licence holders were allowed to advertise their offerings to familiarise players with the legal options and entice them to stop gambling with the illegal offerings and instead engage with the legal ones. The gambling market opened on 1 October 2021 with ten licensed providers. Prior to this, various parties had warned of a significant increase in marketing; in a new, competitive market, companies want to gain market share as quickly as possible. Particularly, the two state-owned enterprises spent a lot of money on advertising in October and were very visible in public spaces and through various media. Shortly after the opening in October, motions were passed to limit advertising and prohibit unfocused advertising for online gambling, resulting in the Decree on Untargeted Remote Advertising of Remote Games of Chance (Besluit Orka) that came into effect on 1 July 2023. However, the substantial increase in advertising could have been anticipated when a new market was opened with almost no advertising restrictions.

The regulation explicitly did not aim to create additional demand. However, there are strong indications that the number of participants in online gambling has increased since the implementation of the Wet Koa. The number of player accounts that are used monthly has risen, and in a large-scale survey among players, 70% indicated that they started gambling online only after October 2021. When channelling is accompanied by the side effect of more people gambling, more individuals are exposed to addiction risks, meaning that there is not automatically an improvement overall.

Additionally, the Wet Koa also specifically aims to protect young people and vulnerable individuals. Part of this is that advertising should initially not be targeted at these groups. Since Besluit Orka, licence holders must also take measures to explicitly prevent advertising from reaching young people and vulnerable individuals. They must do this using the best possible techniques, and the Ksa can verify the reports of the reach. For young adults, the question arises as to whether the best available techniques (data from advertising services and age selection upon entering the website) are indeed sufficient. Furthermore, those registered in Cruks also fall under the category of vulnerable individuals. Due to the way Cruks has been set up and is used, licence holders do not know

whether a person who previously played with them is registered in Cruks, as long as that person does not attempt to log in. As a result, they may (unintentionally) still target advertising at this vulnerable group. Statistics also show that participation in online gambling among young adults (24 years or younger) has increased since the implementation of the Wet Koa: the number of player accounts among young adults actively used has grown by approximately 80% by the end of 2023 compared to the end of 2021.

Finally, the channelling of players from illegal to legal offerings can occur in two ways:

1. The licensed offering is so appropriate and attractive, and the player is aware of it (through advertising), that they choose to switch from the illegal offering to the legal one.
2. The illegal offering has become so inaccessible that the player can only gamble with the legal offering if they wish to continue playing.

Both routes are currently being pursued: licensed providers are allowed (to a certain extent) to advertise their offerings, which are, in many respects, just as attractive as the illegal offerings, and the Ksa has the legal obligation to combat the illegal market. However, enforcement against the illegal market is not progressing as desired. This is primarily due to the fact that the enforcement tools available to the Ksa do not sufficiently align with the characteristics and approach of the illegal providers. These parties are typically not based in the Netherlands but operate from complex jurisdictions where they can technically shield themselves, making it difficult for the Ksa to exert pressure or enforce measures effectively.

Improved enforcement of the illegal market, making it less visible and less attractive, could create space to regulate the licensed offerings more strictly without a decrease in attractiveness leading to de-channelling.

Points for improvement

Below, we outline several points for improving the legislation and the implementation of the policy that emerged during this evaluation and based on the conclusions drawn. The points listed below are suggestions for enhancing the legislation but do not contain specific recommendations on how this should be accomplished.

Legalisation and regulations

In terms of the duty of care, the baseline must be raised across all providers. Because providers must compete with each other and have a financial incentive to retain players for as long as possible, it cannot be expected that they will collectively take responsibility for players. **Research should be conducted on how the expertise of specialists can be utilised to improve the fulfilment of the duty of care among providers.** By developing this, for example, into a central addiction prevention policy or in legislation, the baseline for all providers will be raised, and competition regarding the duty of care will be

reduced. Additionally, this approach will make it easier for the Ksa to enforce compliance with the duty of care.

The negative consequences of gambling do not solely arise from addiction. The aim of addressing broader **gambling-related harm** and including measures for this in legislation would better protect players. However, consideration must be given to feasibility, and clear definitions and frameworks should be established in advance. Furthermore, a wider range of stakeholders, such as debt counselling services, should also be involved in gambling policy.

Players must be protected across the entire licensed offering, not just with individual providers. Protective measures such as play limits are currently not fully effective because they are not overarching. Research should be conducted to determine how this type of **overarching functionality** can be implemented.

The current **advertising rules for gambling** allow targeted advertising and are intended to protect vulnerable groups. However, it is still possible for vulnerable individuals to be exposed to this advertising (for example, because these rules are not fully airtight in practice or because vulnerable individuals receive advertisements through other channels, such as *affiliates*). The 2019 study by IViR examines the legal options for limiting gambling advertising (Zuiderveen Borgesius, Zimin, Power, & Van Eijk, 2019). This can serve as a starting point for further exploration of how advertising rules can be made more effective to better align with the policy objectives.

Currently, there are challenges regarding **information sharing related to match-fixing and breaches of sports disciplinary law**. Research should be conducted to determine how these issues can be resolved.

For the enforcement of the illegal market, it is essential that the Ksa can block access to the websites of unlicensed providers. It should be investigated how **the Ksa can obtain the authority for DNS blocking**, similar to its foreign regulatory counterparts, to take down the websites of unlicensed providers.

Implementation

For effective oversight, the Dutch Gaming Authority (Ksa) would benefit from conducting **mystery guest research to monitor the gambling interface**. It should be determined whether the Ksa can obtain completely false identities or if it needs to engage external agencies. Additionally, the Ksa also requires the ability to **suspend a licence without the intention of revoking it**, so that providers cannot offer their gambling services while they are in violation.

Independent researchers and policymakers should have access to **provider-overarching player data** to improve gambling policy. This would involve linking data from different

providers to allow for an analysis of gambling behaviour that spans multiple providers. A study on this is set to commence soon by the WODC.

In parallel to enforcing actions against illegal providers themselves, the Ksa, with the authority of binding directives, could further enforce actions against **parties in the ecosystem of an illegal provider**, such as the hosting company, payment provider, and platforms that advertise, to limit access to these providers and reduce their legitimacy.

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