

## Public consultation on the Green Paper on on-line gambling in the Internal Market

You are invited to reply to the on-line questionnaire. The questions listed in the Green Paper are reproduced in the same order hereunder. A pdf version of the [Green Paper](#) is available in all EU languages for guidance to the questions.

There are 51 questions in the consultation document. You may reply to those questions in any one of the EU languages. You may focus your contributions on the areas of most interest to you; you are not obliged to answer all the questions.

Please save this document on your computer. Once you have completed the questionnaire, come back to the on-line questionnaire. You will be able to upload your answers on page 3 of the on-line questionnaire.

The consultation will close on 31/07/2011.

We thank you for your participation.

### Your name / Your organisation:

SPER (The Ethical Council of the Gaming Industry) is a gathering of nationally regulated gaming companies and acts as a discussion forum for gaming ethics. SPER's members are ATG, A-lotterierna, Folkspel, Ideella Spel, Lottericentralen, Miljonlotteriet, Swebico and Svenska Spel.

### Questions from the Green Paper on on-line Gambling in the Internal Market

1. Regulating on-line gambling in the EU: Recent developments and current challenges from the Internal Market standpoint
  - 1.1. Purpose of the consultation
  - 1.2. On-line gambling in the EU: current situation

**(1) Are you aware of any available data or studies on the EU on-line gambling market that would assist policy-making at EU and national level? If yes, do the data or study include licensed non-EU operators in the EU market?**

**(2) Are you aware of any available data or studies relating to the nature and size of the black market for on-line gambling services? (Unlicensed operators)**

[ ]

**(3) What, if any, is your experience of EU-based on-line gambling operators licensed in one or more Member State and providing and promoting their services in other EU Member States? What are your views on their impact on the corresponding markets and their consumers?**

[ ]

**(4) What, if any, is your experience of licensed non-EU on-line gambling operators providing and promoting their services in EU Member States? What are your views on their impact on the EU market and on consumers?**

[ ]

**(5) If any, which are the legal and/or practical problems that arise, in your view, from the jurisprudence of national courts and the CJEU in the field of online gambling? In particular, are there problems of legal certainty on your national and/or the EU market for such services?**

[ ]

**(6) Do you consider that existing national and EU secondary law applicable to on-line gambling services adequately regulates those services? In particular, do you consider that coherence / consistency is ensured between, on one hand, the public policy objectives pursued by Member States in this field and, on the other hand, the national measures in force and/or the actual behaviour of public or private operators providing on-line gambling services?**

[ ]

**Other comments on issues raised in section 1**

[ ]

2. Key policy issues subject to the present consultation

2.1. Definition and organisation of on-line gambling services

**(7) How does the definition of on-line gambling services in the Green Paper differ from definitions at national level?**

[ ]

**(8) Are gambling services offered by the media considered as games of chance at national level? Is there a distinction drawn between promotional games and gambling?**

[ ]

**(9) Are cross-border on-line gambling services offered in licensed premises dedicated to gambling (e.g. casinos, gambling halls or a bookmaker's shop) at national level?**

**(10) What are the main advantages/difficulties associated with the coexistence in the EU of differing national systems of, and practices for, the licensing of on-line gambling services?**

**Other comments on issues raised in section 2.1**

2.2. Related services performed and/or used by on-line gambling services providers

**(11) With focus on the categories mentioned in the Green Paper, how are commercial communications for (on-line) gambling services regulated for at national level? Are there specific problems with such cross-border commercial communications?**

The purpose of SPER (The Ethical Council of the Gaming Industry) is to safeguard its customers by acting as ethical gaming companies through self-regulatory measures. The gaming companies shape joint guidelines for marketing and minimum age limits for the purchase of lottery tickets and work together to form new, joint gaming ethics that involve joint national guidelines for gaming responsibility.

The Swedish gaming regulations do not contain, with the exception of the prohibition on the promotion of gaming, any explicit regulations on the marketing of games. To a certain degree, such restrictions are followed by the permits that have been issued in relation to the individual permit holder. These are, however, very general and do not regulate in detail how the marketing may be worded. Instead, the majority of the regulated gaming companies in Sweden have taken their own initiative to apply joint guidelines for marketing.

In addition to this, the general marketing legislation is also applicable on online gaming. Here follow those regulations that SPER believes to be relevant for online gaming based on the forms of commercial messages that are mentioned on page 16 of the Green Paper.

**The Prohibition on the Promotion of Gambling**

The prohibition on the promotion of gambling in paragraph 38 of the Swedish Lotteries Act means that it is prohibited, in commercial operations or otherwise, to promote participation in unlicensed gambling organised within Sweden or abroad.

In the preparatory work for the Swedish Lotteries Act (Prop. 1993/94:182 page 78) it is stated that the range and mediation of stakes and winnings in addition to otherwise enabling participation in a lottery unlicensed in Sweden or a foreign lottery are also covered by the

prohibition. All marketing of online gaming organised in Sweden without a licence or organised outside Sweden is covered by this prohibition, whether it takes place through a commercial on Swedish TV, an advertisement in a Swedish newspaper or publication on a Swedish website, as well as all other ways of spreading messages about lotteries in Sweden.

In a ruling made by the Supreme Administrative Court of Sweden RÅ 2004 ref. 96 it was decided that granting a position on a website for a banner with a link to a foreign gaming company constitutes a prohibited promotion.

On 22 June, the Svea Court of Appeal pronounced judgement on the case where Aftonbladet and Expressen's former chief editors were charged with breaking the Swedish Lotteries Act (case numbers B1016-08 and B1103-08). According to the court of appeal, this signifies that the current wording of the penal provision in the Swedish Lotteries Act is in breach of EU's prohibition of discrimination. For this reason, the penal provision cannot be applied in this case. The Court of Appeal has thus decided to overrule judgements made by the district court and is dismissing the charge against the former chief editors.

#### SPER members' licences

The majority of SPER's members have licences to organise Internet gambling. This means that a company in its marketing of its business shall have a responsible gambling policy that also involves social commitment, with the purpose of not being overly intrusive.

It should also be added that the voluntary guidelines for marketing should clarify how companies can market their services in such a way as to guarantee responsibility, see below.

#### Joint marketing guidelines for the gaming industry

The majority of the regulated gaming companies in Sweden have, within the framework of SPER, come to an agreement over branch standards for the marketing of gaming. Appendix 1. You can also look at [www.SPER.se](http://www.SPER.se)

These guidelines state the restrictions regarding wording and target groups. The guidelines are based on gaming responsibility and experience of how the marketing of games can lead to an increase in problem gambling. The guidelines have been drawn up based on collective experience and research currently available.

Marketing material such as coupons, receipts, Internet etc shall also provide members with the telephone number to a support line (telephone counselling for people with gambling problems).

#### The Swedish Marketing Act

As mentioned above, online gaming services are also covered by general marketing legislation, particularly in the form of the Swedish Marketing Act.

The Swedish Marketing Act states certain basic marketing principles such as the fact that marketing shall not be aggressive or misleading and that it shall be in accordance with good marketing practice.

Through the Swedish Marketing Act, a directive on unfair commercial practices has been implemented. SPER wishes to, in this respect, specifically stress the prohibition in point 9 in the so-called black list. A great deal of the extensive marketing carried out by foreign gaming companies that takes place in Sweden, in whichever form it is, is probably prohibited in

accordance with this point. As far as SPER is aware, this matter has not yet been tried in a Swedish court of law.

Those provisions on direct marketing that can be found in the Distance Selling Directive and the Directive on Privacy and Electronic Communication were implemented through the Swedish Marketing Act, which also, among other things, assumes that a physical person, as a general rule, shall have given consent in advance to unordered advertising via email, fax, automatic call devices or text messages. Exceptions might occur when owners of businesses have obtained address details in connection to prior sales to the physical person.

#### Sales promoting competitions

In the case of sales promoting competitions, it can be mentioned that a sales promoting competition based on luck (rather than skill) is deemed to be a lottery, which, in general, requires a licence in accordance with the Swedish Lotteries Act.

#### Direct marketing

Direct marketing includes all direct marketing activities that aim at achieving direct communication with the consumer or company and is designed to create measurability, for direct sales, further information or visits to the shop or website.

Direct marketing is sometimes confused with direct mail. Direct mail is a channel in the same way as TV, radio, the daily press etc. Direct mail is currently one of the largest channels of media.

Direct marketing provides companies with a tool box in which to balance their marketing budgets based on the purpose it has to fill: create new customers, retain and develop current customers and recover old ones. Channels that are used for Direct marketing are, for example, addressed/unaddressed direct mails, emails, SMS/MMS, search marketing, telemarketing, Internet advertising etc. Wide mass media channels can also be used for direct marketing, e.g. TV advertising (Direct Response TV) or advertising in print.

Direct marketing is a strategy/method that can be applied in all media channels. Direct marketing can also be described as a principle – the principle to always help the customer in the decision process and focuses on retaining or influencing a certain customer behaviour, where communication directly to individual target groups or individuals is a basic requirement.

Many perceive direct marketing to be intrusive and SPER is of the opinion that companies have a particular responsibility for communication being clear and for always giving customers the chance to turn down advertising from the different gaming companies.

Besides those directives that are regulated by the Distance Selling Directive 97/7/EG, the Unfair Commercial Practices Directive 2005/29/EG, the Data Protection Directive 95/46/EG and the Directive on Privacy and Electronic Communication 2002/58/EG. Advertisements communicated by members of SPER are to follow applicable Swedish legislation, be honest and not overly intrusive. Clarification: By legal and honest, we mean that SPER's members are to follow applicable Swedish legislation regulating advertising.

The legislation includes the Swedish Marketing Act, the Personal Data Act and the Act on Names and Pictures in Advertising.

By not being offensive or intrusive we mean that our messages should not offend any groups or be perceived as being overly excessive by consumers.

SPER's members shall respect personal integrity and those persons who have declined direct mail and telemarketing (which includes those persons in the NIX register and those with "No junk mail please" signs on doors and letterboxes).

SPER's members shall offer customers the chance to decline marketing communication. In the case of Internet advertising, so-called pop-ups shall be limited as far as possible.

SPER's members shall not either offer free games in the form of free stakes.

#### TV Commercials

TV commercials for foreign gaming companies are extremely common in Sweden. These commercials, which are shown in Swedish and with Swedes as the primary target group, are usually aired by TV companies that are established outside Sweden (often England). The target group for this type of marketing is primarily concentrated on men in the age groups 18-24 and 25-44. The 18-24 age group is displaying large increases in problem gambling. Source: Svenska Spel 2011. This risks undermining the national gaming regulations that aim at good consumer protection and the protection of vulnerable groups.

The above-mentioned circumstances signify that, according to SPER, for the present at least, there is no consensus between the goals formulated by the Swedish government with Swedish gaming politics and the prevailing market situation.

Here follow the results from SWELOGS regarding the gambling problems of online gamblers, where a distinction is made between gambling at Sweden's regulated and unregulated market players respectively. The result shows that the number of problem gamblers is much higher among those that only gamble with Sweden's unregulated market players than those that only gamble with Sweden's regulated market players. Those persons with the worst problems are those that gamble with both regulated and unregulated market players.

	Online gamblers or not 2009(2010)			
	Gamblers, not online	Online gamblers, only regulated	Online gambl. only unregul.	Online gamblers, regulat.&unregulat.
Gambling problems	n=3606	n=530	n=102	n=167
Certain risks	3,4%	9,6%	26,5%	22,8%
Problem gamblers	1.6 %	3.4 %	8.8 %	15.6 %

Fig. Result from SWEDLOGS regarding online gamblers at regulated and unregulated gaming companies respectively.

Source: FHI, The Swedish National Institute of Public Health, Ulla Romild (statistics at Spelteamet)

(12) Are there specific national regulations pertaining to payment systems for on-line gambling services? How do you assess them?

(13) Are players' accounts a necessary requirement for enforcement and player protection reasons?

(14) What are the existing national rules and practices relating to customer verification, their application to on-line gambling services and their consistency with data protection rules? How do you assess them? Are there specific problems associated with customer verification in a cross-border context?

#### Other comments on issues raised in section 2.2

##### General

According to SPER's estimations there are around 150 foreign private gaming companies that offer their services in Sweden. The net turnover for foreign private gaming companies in Sweden totalled, according to Svenska Spel, approximately 25.3 million euro, which is equivalent to 33 per cent of the known online gaming market at the time. Of this turnover, the greater part stems from companies with licences in other EU countries. Foreign private gaming companies' net gaming revenues is currently estimated at approximately 209 million euro annually, or about 44 per cent of the known Swedish online gaming market. It is believed that this number will continue to grow since gaming accessibility is large and the use of mobile phones and the Internet is relatively well developed in Sweden. In total, the foreign companies account for approximately ten per cent of the net gaming revenues on the known Swedish gaming market. Source: Svenska Spel, 2011.

Foreign private gaming companies market themselves heavily in Sweden, which is the primary reason why the total marketing of gaming services in Sweden has soared from 48.1 million euro (gross, for 2010) in the year 2000 to just over 176.2 million euro (gross including Internet) in 2010. The foreign private gaming companies increased their advertising during the same period from just 22 000 euro (gross, excluding Internet) in the year 2000 to 90.5 million euro (gross, including Internet) in 2010. Source: Svenska Spel, 2011.

The player base for foreign private gaming companies is mainly concentrated among men in the age groups 18-24 and 25-44. There has been a large increase in problem gambling among the 18-24 age group.

Source: The Swedish National Institute of Public Health

2.3. Public interest objectives

2.3.1. Consumer protection

**(15) Do you have evidence that the factors listed in the Green Paper are linked to and/or central for the development of problem gambling or excessive use of on-line gambling services? (if possible, please rank them)**

**(16) Do you have evidence that the instruments listed in the Green Paper are central and/or efficient to prevent or limit problem gambling relating to on-line gambling services? (if possible, please rank them)**

**(17) Do you have evidence (e.g. studies, statistical data) on the scale of problem gambling at national or EU level?**

**(18) Are there recognised studies or evidence demonstrating that on-line gambling is likely to be more or less harmful than other forms of gambling for individuals susceptible to develop a pathological gaming pattern?**

**(19) Is there evidence to suggest which forms of on-line gambling (types of games) are most problematic in this respect?**

**(20) What is done at national level to prevent problem gambling? (E.g. to ensure early detection)?**

**(21) Is treatment for gambling addiction available at national level? If so, to what extent do on-line gambling operators contribute to the funding of such preventive actions and treatment?**

**(22) What is the required level of due diligence in national regulation in this field? (e.g. recording on-line players' behaviour to determine a probable pathological gambler?).**

**(23) What is the statutory age limit for having access to on-line gambling services in your Member State? Are existing limits adequate to protect minors?**

Paragraph 35 of the Swedish Lotteries Act states a minimum age limit of 18 for betting at horse races, gaming machines, roulette games, dice games and card games. Paragraph 4 of the Swedish Casino Act states a minimum age limit of 20 for casino gaming. In addition to this, paragraph 21 d) in the Swedish Lotteries Act states that the government or the authorities decided upon by the government have the right to rule on directives regarding, among other things, minimum age limits. SPER's member Svenska Spel has been informed of this, which has led to the company not allowing anyone under the age of 18 to take part in individual games of Internet poker or Oddset.

This can also be followed by the Swedish Lottery Inspection's specific terms and conditions for how gaming can be mediated via the Internet. This involves a minimum age limit of 18 for all online gaming. It can be added here that SPER's members have all volunteered to implement a minimum age limit of 18 for lottery tickets purchased from retailers, where the authorities have not decided upon an obligatory minimum age limit.

In gaming research there is evidence that the earlier you start gambling, the easier it is to become addicted. A uniform minimum age limit would also make it easier for retailers to carry out minimum age limit checks.

Members of SPER aspire to safeguard their customers by acting as ethical gaming companies – for this reason we have decided to take a stand regarding the importance of a minimum age limit for games sold via retailers. This is yet another step in our work to indicate our responsibility – because we care about our players. Research shows that those who start gambling at an early age, run a larger risk of becoming addicted than others. SPER is of the opinion that gaming companies have a responsibility to prevent minors from taking part in games where money is at stake. We believe that minimum age limits are a good solution for both online and offline environments at regulated companies.

#### Identification

As mentioned above, gaming companies are obliged to check the age of the players.

In Sweden there are strict rules governing online gaming services and particular importance is placed on gaming companies being instructed to check the age of the players. In the case of online gaming, it is not possible to check that minimum age limits are observed at every individual game since there is no direct contact with the players. This means that in general it is more difficult to maintain minimum age limits at online games compared with games in physical environments. An example of this difference is Casino Cosmopol, which has a minimum age limit of 20, where every guest has to show identification every time he/she visits the casino. Minimum age limit checks are very effective here. In the case of gaming at Svenska Spel and ATG's retailers and business partners, minimum age limit compliance is checked by external suppliers and the Swedish Lottery Inspection through regular test purchases by "mystery shoppers". The results of this are excellent and sanctions for those retailers or business partners where "mystery shoppers" have been allowed to make purchases are extremely hard. If the retailer or business partner fails to check ID on several occasions, Svenska Spel and ATG have the right to terminate the agreement.

The statistics from Swedish Public Health Authority (FHI) shows that a significantly lower amount of people aged 16-18 today show interest in placing bets on for example horse racing compared to before. It is SPER:s view that age limit controls work well both on-line and off-line among the swedish regulated companies.

**(24) Are on-line age controls imposed and how do these compare to off-line 'face-to-face' identification?**

**(25) How are commercial communications for gambling services regulated to protect minors at national or EU level? (e.g. limits on promotional games that are designed as on-line casino games, sports sponsorship, merchandising (e.g. replica jerseys, computer games etc) and use of social on-line networks or video-sharing for marketing purposes.**

One of the purposes of regulating Swedish gaming is to protect minors and other vulnerable groups by strictly regulating gaming procedures in Sweden. In spite of this, the Swedish Lotteries Act has no explicit regulations regarding how and to whom gaming may be marketed.

Regulated gaming companies in Sweden, through the branch organisation SPER, have, as mentioned above, come to an agreement regarding the application of joint guidelines for marketing. These guidelines contain, to a great extent, rules that aim at protecting both minors and vulnerable groups. An example of this is that advertising is not allowed to take place in situations that mainly attract minors or be designed in such a way as to target this group. Nor are persons under the age of 18 allowed to have a central role in the advertisements unless the context of this role is justified by the purpose contributed to by the gaming organiser and when the game is not being directly marketed.

Marketing in relation to minors is partially regulated by general marketing regulations in, among other things, the Radio and Television Act. The preparatory work for the Swedish Marketing Act and ICC's basic regulations both state that children are a specific group that merits attention. This has also had an impact on The Swedish Market Court's judgement in praxis, see the Swedish Consumer Agency's guiding publication "Marknadsföring riktad till barn och unga samt minderåriga som avtalsparter". ("Marketing targeted at children and youngsters and minors as contracting parties". 19 January 2006

Social networking sites and other marketing sites on the Internet sometimes have minimum age limits for their visitors. This, however, is not, as far as SPER is aware, based on stipulations in Swedish law that regulate minors' use of social networking or the like, but is a self-imposed measure.

**(26) Which national regulatory provisions on license conditions and commercial communications for on-line gambling services account for the risks described in the Green Paper and seek to protect vulnerable consumers? How do you assess them?**

As the answer to question 25 makes evident, one of the reasons behind Swedish gaming laws is to protect minors and other vulnerable groups. In spite of this, the Swedish Lotteries Act has no explicit regulations regarding how and to whom gaming may be marketed.

The restrictions that may be listed in permits and in companies' contracts from the owners offer no specific protection for vulnerable groups, but apply in general to marketing.

The joint branch guidelines for marketing that have been drawn up by SPER contain, to a great extent, regulations for protecting vulnerable groups and which aim to prevent problem gambling.

SPER's members have a huge responsibility for their commercial message.

The guidelines involve, among other things, that gaming advertising:

- may not be offensive, intrusive or misleading
- may not claim that the outcome of the draw itself in a game of chance is down to anything but luck.
- may not contain any incorrect information about the possibilities of winning
- may not be targeted at youngsters or at vulnerable or particularly exposed groups in society
- may not encourage excessive gambling or claim that there are no risks to excessive gambling

Information shall also be provided on gambling-related problems and the help that is available to the consumers.

The guidelines also regulate how jackpots can be communicated and show that SPER's members have taken further action towards strengthening guidelines by taking decisions on, first and foremost, marketing so-called slow games, while games with higher risks are by and large not marketed at all.

We believe that the guidelines that have been drawn up by SPER for the Swedish gaming market offer Swedish players protection and form a good basis for an ethically correct gaming market.

### **Other comments on issues raised in section 2.3.1**

#### 2.3.2. Public order

**(27) Are you aware of studies and/or statistical data relating to fraud and on-line gambling?**

**(28) Are there rules regarding the control, standardisation and certification of gambling equipment, random generators or other software in your Member State?**

**(29) What, in your opinion, are the best practices to prevent various types of fraud (by operators against players, players against operators and players against players) and to assist complaint procedures?**

**(30) As regards sports betting and outcome fixing - what national regulations are imposed on on-line gambling operators and persons involved in sport events/games to address these issues, in particular to prevent 'conflicts of interest'? Are you aware of any available data or studies relating to the magnitude of this problem?**

**(31) What issues should in your view be addressed in priority?**

**(32) What risks are there that a (on-line) sports betting operator, which has entered into a sponsorship agreement with a sports club or an association, will seek to influence the outcome of a sports event directly or indirectly for profitable gain?**

**(33) What concrete cases are there that have demonstrated how on-line gambling could be used for money laundering purposes?**

**(34) Which micro-payments systems require specific regulatory control in view of their use for on-line gambling services?**

**(35) Do you have experience and/or evidence of best practice to detect and prevent money laundering?**

**(36) Is there evidence to demonstrate that the risk of money laundering through on-line gambling is particularly high in the context of such operations set up on social web-sites?**

**(37) Are national e-commerce transparency requirements enforced to allow for illegally operated services to be tracked and closed? How do you assess this situation?**

**Other comments on issues raised in section 2.3.2**

2.3.3. Financing of benevolent and public interest activities as well as events on which on-line sports betting relies

**(38) Are there other gambling revenue channeling schemes than those described in the Green Paper for the public interest activities at national or EU level?**

**(39) Is there a specific mechanism, such as a Fund, for redistributing revenue from public and commercial on-line gambling services to the benefit of society?**

**(40) Are funds returned or re-attributed to prevention and treatment of gambling addiction?**

**(41) What are the proportions of on-line gambling revenues from sports betting that are redirected back into sports at national level?**

**(42) Do all sports disciplines benefit from on-line gambling exploitation rights in a similar manner to horse-racing and, if so, are those rights exploited?**

**(43) Do on-line gambling exploitation rights that are exclusively dedicated to ensuring integrity exist?**

**(44) Is there evidence to suggest that the cross-border "free-riding" risk noted in the Green Paper for on-line gambling services is reducing revenues to national public interest activities that depend on channelling of gambling revenues?**

**(45) Do there exist transparency obligations that allow for gamblers to be made aware of whether and how much gambling service providers are channelling revenues back into public interest activities?**

**Other comments on issues raised in section 2.3.3**

2.4. Enforcement and related matters

**(46) Which form of regulatory body exists in your Member State and what are its competences, its scope of action across the on-line gambling services as defined in the Green Paper?**

**(47) Is there a national register of licensed operators of gambling services? If so, is it publicly accessible? Who is responsible for keeping it up to date?**

**(48) Which forms of cross-border administrative cooperation are you aware of in the domain of gambling and which specific issues are covered?**

**(49) Are you aware of enhanced cooperation, educational programmes or early warning systems as described in the Green Paper that are aimed at strengthening integrity in sport and/or increase awareness among other stakeholders?**

**(50) Are any of the methods mentioned in the Green Paper, or any other technical means, applied at national level to limit access to on-line gambling services or to restrict payment services? Are you aware of any cross-border initiative(s) aimed at enforcing such methods? How do you assess their effectiveness in the field of on-line gambling?**

**(51) What are your views on the relative merits [in terms of suitability and efficiency] of the methods mentioned in the Green Paper as well as any other technical means to limit access to gambling services or payment services?**

**Other comments on issues raised in section 2.4**

## Other comments on issues raised in the Green Paper

The Swedish gaming regulations contain, with the exception of the prohibition on the promotion of gaming, no explicit regulations on the marketing of games. To a certain degree, such restrictions are followed by the permits that have been issued in relation to the individual permit holder. These are, however, very general and do not regulate in detail how the marketing may be worded. Instead, the majority of the regulated gaming companies in Sweden have taken their own initiative to apply joint guidelines for marketing through SPER.

SPER (The Ethical Council of the Gaming Industry) was formed in 2002 as an informal council for ethical issues. The background was a threat of legislation for the marketing of gaming. A group of leading gaming companies therefore entered into discussions on joint guidelines for marketing. The first guidelines came into use in 2003 and have been updated several times since. The following year, 2004, the gaming companies agreed to advertise the support line's 020 number on all coupons, gaming receipts, lottery tickets and information material.

In autumn 2009 the council's work to further strengthen joint gaming ethics was formalised and the association SPER was formed. The association has a working committee led by a chairman together with a deputy chairman and administrative director.

The purpose of SPER (The Ethical Council of the Gaming Industry) is to safeguard its customers by acting as ethical gaming companies through self-regulatory measures. The gaming companies shape joint guidelines for marketing and minimum age limits for the purchase of lottery tickets from retailers and work together to form a new, joint gaming ethics that involve joint national guidelines for gaming responsibility.

The goal of The Ethical Council of the Gaming Industry is to gather all nationally regulated gaming companies as a discussion forum for gaming ethics.

SPER's members wish to take their own responsibility to act in an ethically correct way and work for sustainable development in the gaming industry by integrating ethical gaming issues in their daily work.

SPER develops and implements different ethical guidelines that live up to demands placed by different interested parties in the gaming industry.

SPER's work has involved a legislative debate with different interested parties looking positively upon the self-regulatory measures the different gaming companies have carried out. It has also led to marketing, among other things:

- having a less aggressive image
- not involving minors
- being less intrusive
- having reduced in size compared with other market players

SPER's members are ATG, A-lotterierna, Folkspel, Ideella Spel, Lottericentralen, Miljonlotteriet, Swebico, Svenska Spel