

From: consumers@kepka.org  
Sent: samedi 30 juillet 2011 14:00  
To: MARKT GAMBLING  
Subject: Consultation on on-line gambling in the Internal Market

Profile of interest representative:  
ΚΕΝΤΡΟ ΠΡΟΣΤΑΣΙΑΣ ΚΑΤΑΝΑΛΩΤΩΝ

Identification number in the register: 18939412904-80

Dear Sir/Madam,

You can find below our comments on the consultation:

a.. The Commission is late at undertaking any concrete action. Since early 2006 the problem has been identified and now after five years we just have a Green Book.

b.. The advertising of on line gambling should be addressed. The existing legislation on tobacco advertising should be implemented on on-line gambling also. There should also be a banning of pop-up windows advertising on line gambling from sites with irrelevant to gambling content.

c.. The age of the consumers who are allowed to play on line should be set at 25 years. According to Gamcare, most callers were between 18 and 25 years old. Almost 35% of all their callers had this age. If we add 5% of the callers that were under 18 years old then 40% of the addicted that required help were under 25 years old.

d.. Every time that the need to address the market fragmentation or the different legislations of the member states is referred in the document consumer rights protection, the protection of the minors and the vulnerable (eg. Addicted) and the protection of the public interest should be mentioned so that the whole document is better balanced.

e.. There should be definitions of responsible gambling, of fair return etc.

f.. An "EU Safe Gambling" mark of trust should be created which will then be used by those operators who fulfill common EU standards. An EU certification procedure should be set whereby EU authorized operators would receive the EU certification and can carry the EU mark of trust for adopting the EU responsible gaming, consumer protection and other common standards agreed.

g.. The trust mark should be unique, pan-European and should be promoted to consumers through organized campaigns. In case there are problems with the member states that grant licenses the trust mark can be the same for all member states but followed by the initials of the member state that grants the relative license.

h.. We need an authority (public) that will have the power to monitor this sector. Maybe it would be better that this same authority would have the responsibility to grant licenses, give the trust mark and monitor the operation of the sites as long as they work. This authority would have the responsibility to also monitor addiction. It should set criteria to recognize the signs of addiction (eg. Hours of playing, amounts of money, frequency of playing etc) and it should have the power to warn once or twice officially the user and if the same behavior continues the authority should have the power to ask the provider to block the user from all on-line gambling. This authority would also ensure that consumers' personal data are not used by anyone and that consumers privacy is not violated.

i.. Financing benevolent and public interest activities, through gambling can be used as a conscience wash for especially addicted gamblers. So the criteria for licensing such activities should be very strict. Transparency criteria on their financial and operational procedures should be foreseen.

j.. Nobody has so far guaranteed the so called “fair play” in sports. Europe faces huge scandals in the sports sector.

k.. A white list accessible to consumers should be created. The list would include all licensed sites. This list together with the trust sign can help gamblers avoid illegal sites.

Being always at your disposal.

Yours sincerely,

Nikolaos Tsemperlidis, President KEPKA, Member of Economic and Social Council of Greece,

Evangelia Kekeleki, General Secretary KEPKA, Vice President Single Market Observatory, Member EESC and Member ECCG

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