



**GREF**

Gambling  
Regulators  
European  
Forum

Preventing harm and ensuring safer gambling  
through regulatory approaches to advertising

GREF-NAGRA Webinar

23/04/2024

1

# Advertising frameworks & policies

# Advertising : Policy Goals

Goal:

**Player protection**



Advertising normalizes gambling  
Broader recruitment of players  
Increased risk of relapse



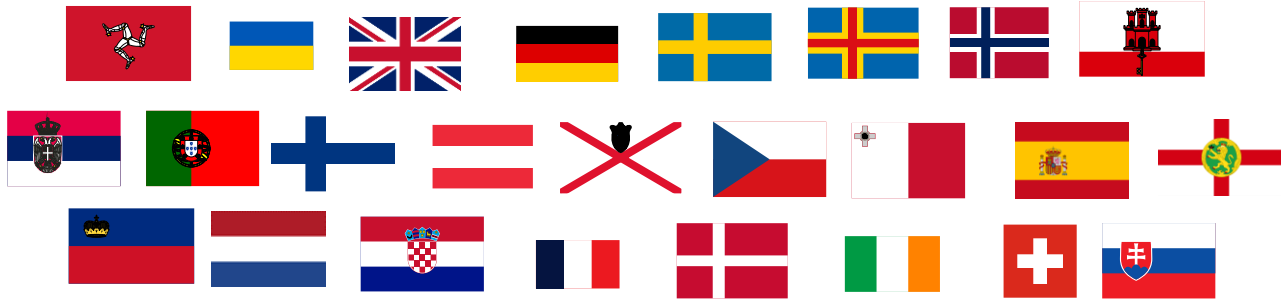
This also means:

**Channeling Players**



Illegal operators advertise regardless  
Legal operators must remain visible

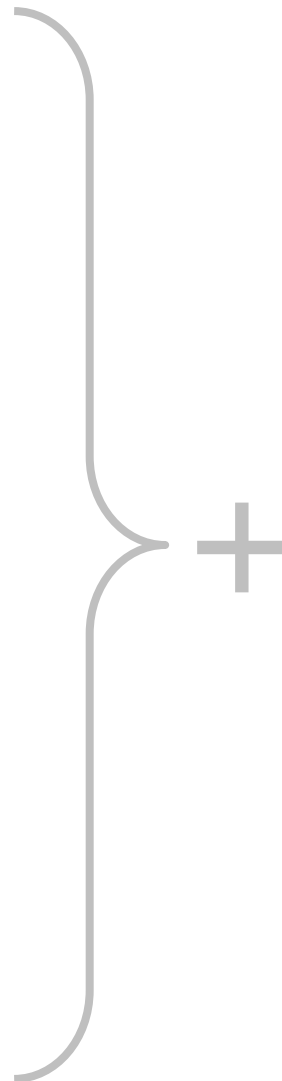
# Different possible frameworks



Generally **allowed**  
with **exceptions**

OR

**Prohibited** unless  
explicitly **allowed**



**Licensed**  
operators only



Additional  
**requirements**

# 'Advertising' Scope



Commonly used notion: '**commercial communication**'  
→ Anything that intends to promote games of chance



Covers **product placement** and **sponsoring**

# B2B

Usually allowed as an exception in closed systems



2

# Advertising restrictions

# Content & Presentation



e.g. advertising must not

- Be **misleading**
- Be attractive to **children**
- Encourage **excessive** gambling
- Encourage **underage** gambling
- Exaggerate possible **gains**
- Be combined with **prevention info**
- Reference **loans or credit**

e.g. advertising must not present gambling as...

- A way to increase **social status**
- A way to solve **financial problems**
- An alternative to **paid work**
- A **skill-based** activity
- A **rite of passage**



# Location of advertising





For example, open systems that prohibit advertising ...


- On surfaces of vehicles / metro
- Near schools or locations frequented by youth
- Outdoors / in public places (e.g. billboards)

Also prohibited implicitly in closed systems, as well as:

- Television
- Newspapers
- Journals

# Advertising outside gaming establishment

  Advertising exceptionally **allowed** inside casinos and gaming halls

 Advertising on façade **allowed** as an exception to the closed system

 **Limited** when outside gaming establishment

   **Prohibited** on and around gambling establishment



# (National) Lotteries



May be subject to specific regulations, e.g.

- Not subject to gambling legislation
- Benefiting from an exemption on advertising rules



# Affiliate Websites / Sponsored Search Results



For example, closed systems that allow advertising:

- In search results (including affiliate websites)

Google search results for "casino". The search bar shows "casino" and "About 996,000,000 results (0,91 seconds)". Below the search bar, there are several sponsored results:

- Sponsored**  
belgjecasinos.be  
https://www.belgjecasinos.be › casino › online  
Beste Online Casino's België - Voor u G...  
De **casino's** zijn gelicentieerd om u van een veilige ca...  
**casino's** die worden getoond op België. **Casino's** zijn...  
bijgewerkt. Gelicentieerd. Gereguleerd. Beste Online C...
- Sponsored**  
Peppermilcasino  
https://www.peppermilcasino.be  
Het Beste Casino van België - Pepperm...  
Speel meer dan 350 online **casino** games. Win tot €25...  
Roulette & Blackjack - Dice slots - Casino dice games -
- Sponsored**  
betFIRST Casino  
https://www.betfirstcasino.be › casino › online  
Mobile Friendly, Instant Play - betFIRST...  
Sign Up Now & Play Our Huge Selection of **Casino** Games. Inc Fakir, Mega Wheels & More.
- Sponsored**  
napoleoncasino.be  
https://www.napoleoncasino.be › roulette › online  
Speel Roulette Online - Napoleon Sports & Casino  
Online games, Live **Casino** & Sportsbetting en meer. 100% Legaal. Schrijf je nu gratis in.

CasinoJager website showing a list of top 10 online casinos. The page title is "Top 10 Online Casino". Below the title, there is a section titled "Top 10 Beste Online Casino's" with a list of casinos and their details:

Rank	Casino Name	Offer	Payment Methods	Rating
1	Paradise Play	200% tot €600 + 250 FS	VISA, Mastercard	5 stars
2	Monixbet	100% tot €5.000 + 335 FS	Mastercard, Visa	5 stars
3	Scarabot	100% tot €250	VISA, Mastercard	5 stars
4	RedDice	200% tot €1.000 + 10% Cashback	Mastercard, Visa	5 stars
5	Slots Hammer	150% tot €150	Mastercard, Visa	5 stars
6	Voltslot	100% tot €1.000 + 200 FS	Mastercard, Visa	5 stars

# Pre-defined contents



For example, content may be limited to:

... which excludes:



**Brand name**  
**Trademark**  
**Logo**



**Slogans**  
**Calls to action**  
**Product images**  
**Descriptors**

e.g. “Sports & Casino”

# Pre-defined contents



... which excludes:



**Slogans**

**Calls to action**

**Product images**

**Descriptors**

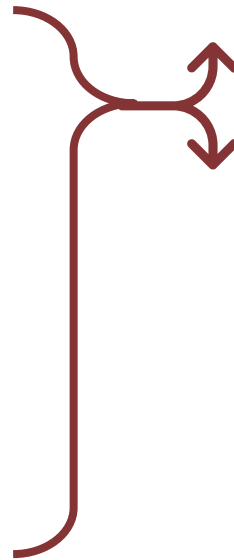
e.g. "Sports & Casino"

# Incentives



Can be in many forms

Gifts  
Bonuses  
Promotions  
Discounts  
Loyalty systems  
VIP Programmes



Possible limitations:

- Banned altogether
- Or specific requirements, e.g. :
  - Transparency
  - Player consent
  - Vulnerable groups
  - Balanced / non-excessive
  - Not during play
  - ~~Not for new players~~
  - Timing not based on player behavior
  - Not allowed to advertise

# Product placement



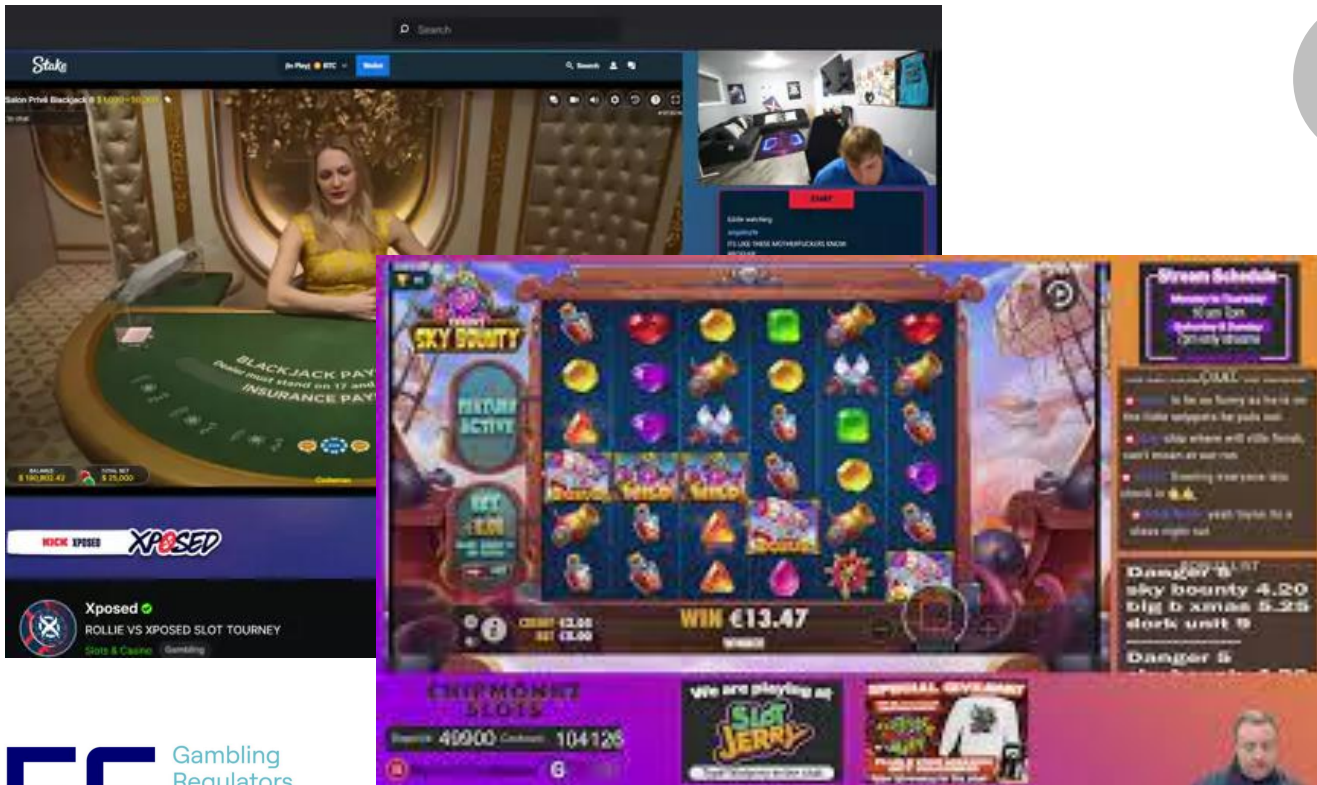
Widely used on  
livestreaming platforms



Banned specifically

or

Forbidden implicitly in  
closed systems





# Sponsoring



Specific rules may apply, e.g. prohibited to implement in :

- Sporting activities in which children could take part
- Events aimed at young people
- Events that can be viewed by minors
- Merchandise for children



Phasing out in some jurisdictions

- Transitory measures for existing contracts!

# Target Audience



e.g. not allowed to be aimed towards:

- Children / Young people
- Excluded persons
- Persons with low income
- Persons looking for aid / care

*Sometimes tied to context/platform, e.g.*



No cross selling



No advertising in games  
(or websites/apps offering them)



Obligatory age targeting



# Direct Marketing / Targeted Advertising



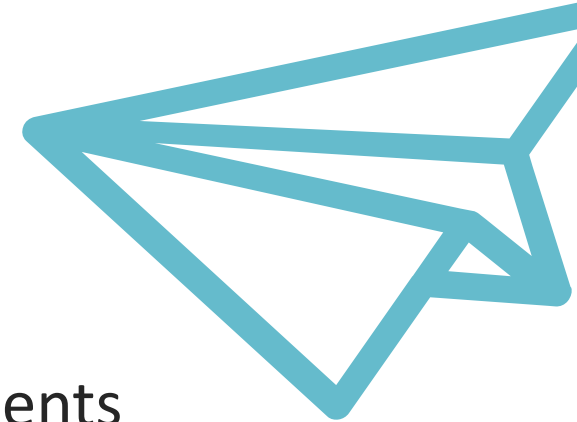
Some practices may be banned, e.g. :

- Personal messages
- Push notifications
- Location tracking
- Telemarketing activities
- Sales activities in residential premises
- Sales activities on public transport



Also possible:

- Ban on untargeted advertising
- Obligation to verify that recipient is not excluded



# Pop-ups / Overlays



Advertising prohibited in the form of

**pop-up, overlay,**

or other methods that restrict/hinder navigation

# Timing / Frequency



*e.g.*



Limited number of advertisements per screen / ad break  
One ad per operator



Only at certain times of day



Not before/during/after programmes aimed to youth  
Not before/during/after sports programmes

# Social Media



Specific rules may apply, e.g. :

- Opt-in requirement
- Involvement of third parties
  - Influencers
  - Algorithm promotion
- Moving images
- Interaction
- Platforms must have age verification



# Person / Character depictions



e.g. limitations on the depiction of :

- Young people / minors
- Personalities / role models with substantial reach among minors
- Sports personalities / athletes
- Any person or character
- Players (incl. winners)



# Mandatory Content



e.g. all advertising must include :

- Minimal age
- Prevention message
- National help line
- Options for exclusion
- Regulator label

PLAY  
SAFE.BE

21+

PLAY WITH MODERATION

Conditions dans votre Circus C



**GREF** Gambling  
Regulators  
European  
Forum



## Getting help

The National Gambling Support Network helps people struggling with gambling, and people who are worried about someone else's gambling.

We give tailored help that fits your situation.

**24/7 FREE Confidential Support**

- Telephone & live chat
- Help centres in your area
- Resources & advice

[How we help →](#) [Find support in your area →](#)

National Gambling Support Network



# 3

## Implementation & Enforcement

# Points of attention

  
**Equality**

*Different rules  
for different products?*



**Legal certainty**



Justification required  
(difference in risk)



'Hybrid' licensees  
(same brand, different game types)



Legal basis



Transitory rules



Avoid legal Ambiguity

# Regulator Competences

Impose sanctions (e.g. fines)

Block websites (blacklist)

Guidelines / Recommendations



Review promotional strategies



Order removal of illegal advertisement

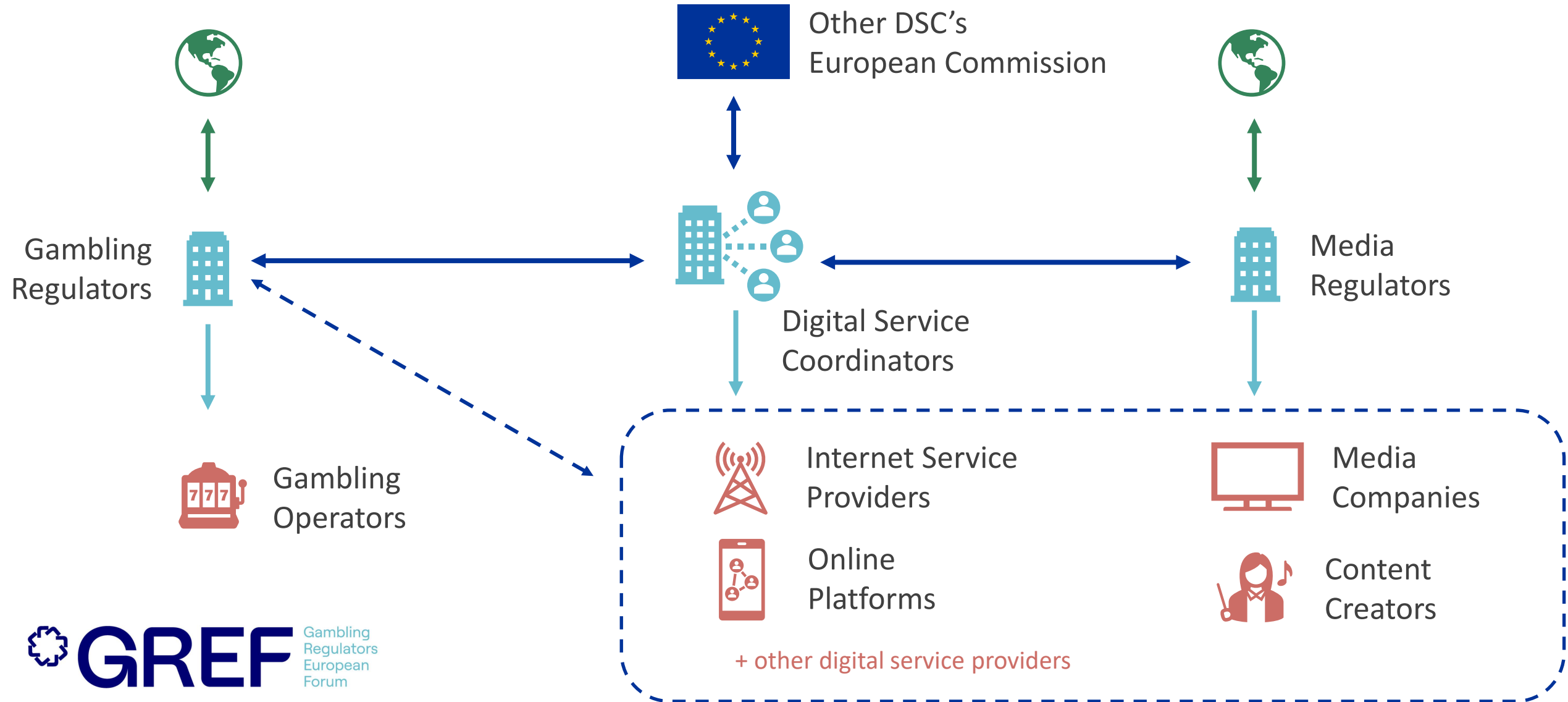


Proscribe volume, frequency, ...



Prior authorization of all advertising

# Need for Cooperation



# Cross-border enforcement



**Rules are different** in each jurisdiction

**Marketing technologies** operate cross border

## **European Union**

27 Member States, majority is also GREF Member

→ Freedom of Establishment

→ Free Movement of Services

# European Union Law

Member States enjoy large **margin of appreciation**



Overriding reasons of **public interest**

- Significant differences between Member States
- No harmonization

- Public health
- Consumer Protection
- Prevention of fraud
- Prevention of incitement to squander money

# European Union Law

Member States enjoy large  
**margin of appreciation**



Overriding reasons of  
**public interest**

## Requirements:

- Consistency
- Systematic approach

# European Union Law



Advertising prohibited unless other Member States provides **essentially equivalent guarantees**

---



Advertising prohibited unless other Member States provides **identical guarantees**



Advertising **only allowed for national operators**, without possibility for others to obtain similar permission



# In Summary



Many **differences** between jurisdictions



Tool for **channeling** policies



**Protection** of minors and other **vulnerable groups**



Preventing positive **associations**



Need for **clear and future proof** regulation



Thank you for your attention !

**Jonathan Van Damme**

[jonathan.vandamme@gamingcommission.be](mailto:jonathan.vandamme@gamingcommission.be)

<https://gref.eu/>