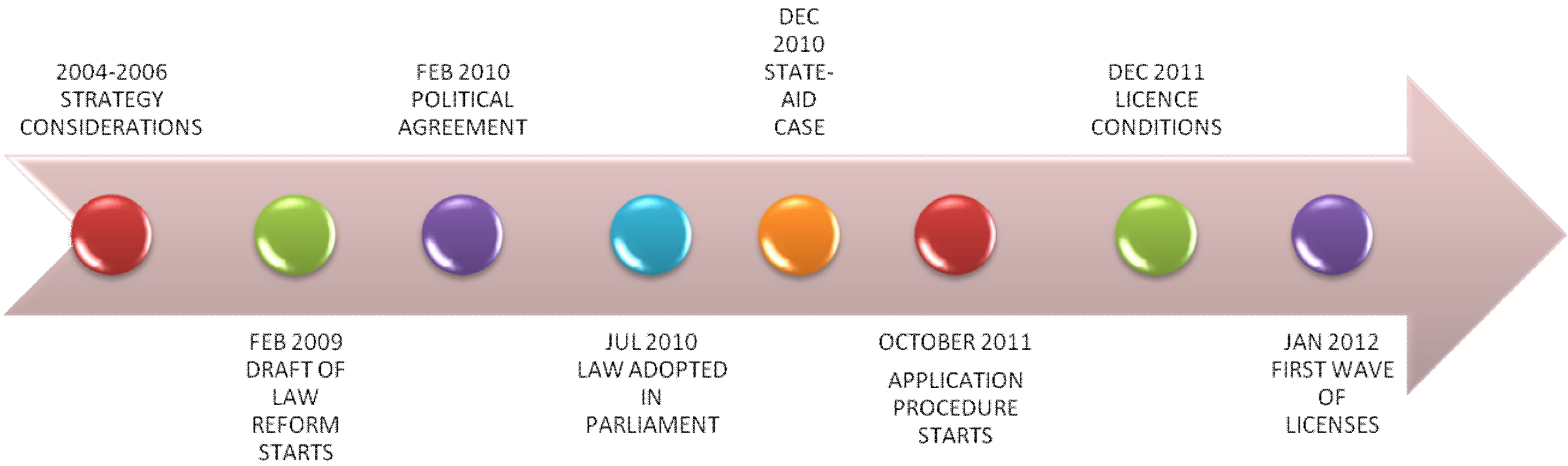
DANISH ONLINE GAMBLING ASSOCIATION

www.doga.dk

REGULATORS AND INDUSTRY

TIME LINE FOR DK REFORM

IT TAKES 6 YEARS TO MAKE A GAMBLING REFORM !



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PROS AND CONS

PROS (+)

Like
Dislike

GENERAL

- Modern, EU approved legislation and regulation gives clarity to all stakeholders
- Unlimited number of licences
- Co-operative and generally efficient relationship with the regulator

GAMES

a. Betting
   - Allows nearly all sports and has no restrictive catalogue like (Spain) or Palinsesto (Italy)
   - Does not discriminate against certain type of operators – like Betting Exchanges
   - No restrictions on in-play (live-betting)

b. Gaming
   - Allows all casino games and international liquidity in poker

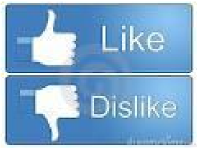
TAX AND LOCATION

- Tax is on gross revenue, not turnover or deposit based
- Applicant company or technology does not have to be in Denmark

PLAYER VERIFICATION AND PROTECTION

- Fully digital age and identity verification with access to national identity registry – efficient and safe for keeping under-18's out
- Efficient but reasonable player protection measures with a centralised problem gambler database

PROS AND CONS



CONS (-)

GENERAL

- Some type of games are kept in monopoly (bingo, lottery, betting on horse-racing)
- An (unfair) advantage has been created for the national lottery operator
- Taxes could be lower (currently 20 pct.) and losses and bonuses are not (always) deductible
- No harmonization of standards – DK standards are unique (= reinvent the wheel)
- No significant regulatory cooperation even though MoU’s (= creates duplication of controls)
- Technical standards are to heavy and over-burdensome
- Marketing guidelines are too restrictive

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GAMBLING MARKET NUMBERS

	2012	2011	2009
Game types	GGR EUR	GGR EUR	GGR EUR
BETTING (LICENSED)	152 *	101	89
BETTING (ILLEGAL)	n/a	50*	34*
ONLINE CASINO (LICENSED)	113 *	0	0
ONLINE CASINO (ILLEGAL)	n/a	59*	63*
BETTING ON HORSE- AND DOG RACING	20 *	20	20
GAMING MACHINES	256 *	240	273
LAND-BASED CASINOS	43 *	43	45
LOTTERIES	349 *	387	363
OTHER GAMES (LEGAL/ILLEGAL)	73 *	119*	116*
TOTAL	1006	1019	1003

*** Estimated numbers**

EXPERIENCES / CHALLENGES

- 45 LICENSES: IS THAT MORE THAN THE MARKET CAN BEAR ?
- THE NATIONAL LOTTERY OPERATOR DANSKE SPIL'S MARKET SHARE OF BETTING AND ONLINE CASINO GAMES HAS GONE FROM 48 PCT TO 61 OF THE TOTAL BETTING AND ONLINE CASINO MARKET (LEGAL/ILLEGAL)
- VERY LITTLE SUBSTITUTION BETWEEN NEW GAMES AND MONOPOLY LOTTERIES
- LESS ADVERTISING THAN EXPECTED AND VERY FEW SPONSORSHIPS
- BLACK MARKET LESS THAN 5 % BUT MAY GROW AGAIN

EU DEVELOPMENT

- EUROPEAN COMMISSION'S ACTION PLAN
- MUTUAL COOPERATION
- HARMONIZATION OF STANDARDS ?
- INFRINGEMENT CASES

GREECE: IS THERE STILL HOPE ?

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THANK YOU !