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Sent on: den 10 augusti 2026 14:06:42
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Subject: Re: Consultation on proposed regulations on responsible gambling (Ref. No. 21Si540) and proposed regulations on technical requirements (Ref. No. 25Si946)

Dear Spelinspektionen

We welcome the opportunity to provide comments on the Swedish Gambling Authority's proposed regulations on responsible gambling and technical requirements.

We support the Authority's objective of strengthening consumer protection and ensuring that responsible gambling measures are effective in identifying and reducing gambling-related harm. At the same time, we believe that the regulatory framework should remain proportionate, risk-based and sufficiently flexible to distinguish between players displaying indicators of harmful gambling and those whose behaviour does not indicate elevated risk.

Against this background, we would respectfully invite the Authority to consider the following points.

1. Cumulative impact of the proposed measures

While the individual measures proposed may each serve a legitimate responsible gambling objective, we believe it is important that their cumulative impact on the customer journey is also assessed.

Requirements relating to electronic identification, recurring information and confirmation messages, information concerning gambling losses, automatic logout and restrictions on autoplay may each appear proportionate when considered separately. When applied collectively, however, they may create a materially higher level of friction, including for customers who do not display indicators of excessive or harmful gambling.

We therefore encourage the Authority to assess the combined impact of these measures as part of its proportionality analysis, including their potential effect on the overall player experience and on channelisation to the Swedish licensed market.

A strong level of consumer protection is fundamental to a sustainable licensed market. At the same time, it is important that regulatory measures do not create unnecessary friction for customers who are not displaying signs of gambling-related harm, particularly where the same protective objective may be achieved through more targeted or risk-based measures.

2. Proposed restriction of autoplay to 60 game rounds

We recognise the potential risks associated with autoplay and support the principle that appropriate safeguards should be applied to the functionality.

However, we would welcome further clarification regarding the empirical basis for selecting a maximum of **60 game rounds** specifically.

The Authority’s consequence assessment acknowledges that autoplay is a commonly used functionality. The Authority's own material indicates that 44% of players who had played commercial online games had used autoplay, increasing to 81% among those who play almost daily. The consequence assessment also acknowledges that restricting autoplay may reduce licensee revenue associated with computer-simulated slot games.

Given the widespread use of the functionality and the potential impact of the proposed restriction, we believe it would be appropriate to establish clearly why 60 game rounds represents the proportionate threshold.

In particular, we would welcome clarification as to whether there is evidence demonstrating a meaningful increase in gambling-related risk at or around 60 consecutive game rounds, as opposed to another threshold.

We would also encourage the Authority to consider whether alternative approaches could achieve an equivalent or greater level of consumer protection with less disruption to the licensed gambling experience. These could include, for example, a different threshold, meaningful stopping points or risk-based interventions where the player's wider gambling behaviour demonstrates elevated risk.

Our concern is not with the introduction of safeguards around autoplay itself, but with ensuring that the specific threshold selected is evidence-based and proportionate to the risk it is intended to address.

3. Automatic logout after one hour

We would also welcome further consideration of the proposed automatic logout requirement following one hour of inactivity.

In particular, the concept of "inactivity" may operate differently depending on the gambling product concerned.

This is especially relevant in sports betting. A customer may legitimately place a bet and then spend a significant period watching the relevant sporting event without interacting with the gambling platform. Such behaviour does not necessarily indicate that the customer has ceased using the service or that an automatic logout is required from a responsible gambling perspective.

We therefore believe that consideration should be given to whether a longer inactivity period would provide an appropriate balance between the intended consumer protection objective and unnecessary disruption to legitimate gambling activity.

We would also welcome greater clarity as to what constitutes activity for the purposes of this requirement. This could include, among other things:

- browsing betting markets;
- monitoring open bets;
- using cash-out functionality;
- navigating account information or transaction history;
- making withdrawals;
- adjusting gambling limits; and
- accessing responsible gambling tools.

Clear definitions would assist licensees in implementing the requirement consistently while avoiding unintended differences in its application.

4. Restriction of access following unacknowledged responsible gambling feedback

Finally, we respectfully suggest that failure by a player to acknowledge or confirm receipt of responsible gambling feedback should not, in itself, automatically constitute sufficient grounds for restricting access to gambling.

The absence of an acknowledgement does not necessarily mean that the player has not read or understood the communication, nor does it necessarily demonstrate that the underlying risk remains present.

This is particularly relevant where subsequent behavioural information shows that the player's gambling has stabilised, reduced or otherwise no longer indicates the same level of risk.

In such circumstances, imposing a mandatory restriction solely because the player has not acknowledged a previous communication could result in an intervention that is disproportionate to the player's current circumstances.

We believe that the requirement should therefore permit the licensee to undertake an overall assessment of the player's subsequent behaviour and available risk indicators before determining whether restriction of access is necessary.

There may also be an unintended consequence if non-response automatically leads to mandatory restrictions. Licensees should be encouraged to engage with players proactively and at an early stage when emerging indicators of risk are identified. If every unanswered early-stage communication could ultimately require a restriction irrespective of subsequent behaviour, this may discourage early and proportionate intervention.

We therefore recommend that escalation remain based on the player's overall risk profile and subsequent gambling behaviour, rather than non-acknowledgement of a communication in isolation.

Conclusion

We fully support the Authority's objective of strengthening responsible gambling protections within the Swedish licensed market.

Our comments are intended to ensure that the final framework remains proportionate, evidence-based and risk-focused, while allowing licensees to intervene effectively where genuine indicators of gambling-related harm are present.

We also believe that consideration of the cumulative effect of the proposed measures is important to maintaining a licensed market that combines strong consumer protection with a high level of channelisation.

We thank the Swedish Gambling Authority for the opportunity to provide our views and respectfully ask that the above considerations be taken into account when finalising the proposed regulations.

Kind regards,

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