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Sent on: den 7 augusti 2026 16:09:26
To: Registrator <Registrator@spelinspektionen.se>
CC: Benjamin Owen <B.Owen@gaminglabs.com>
Subject: Reference Number 25Si946
Attachments: Sweden – GLI Response to consultation 25Si946 .docx (158.3 KB)

Further to the consultation on your website dated 2026-06-18, please find attached the feedback from GLI.

Whilst we have no major issues or concerns with the proposed changes, we do feel that the wording for the definitions of autoplay and progressives leaves room for some ambiguity and would like to understand the intent behind these definitions so as to ensure that we can amend our conformance criteria appropriately.

Please do not hesitate to reach out to us should you have any further questions.

Kind Regards

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30th July 2026

To whom it may concern

Ref: 25Si946 – Response to consultation on Proposal for new regulations on technical requirements.

We refer to above mentioned document released for public comment on 18th June 2026.

Gaming Laboratories International (GLI) has over 36 years of experience working with gambling regulators in over 700 jurisdictions worldwide and is the largest independent test laboratory employing over 1,700 people. GLI's professional staff is comprised of lawyers, former regulators and experts in gaming standards, security and regulation. We have previously consulted to existing and emerging jurisdictions worldwide and have provided expert testimony before dozens of legislative bodies. With this background, we believe that we are well qualified to provide comments on the document.

The newly added/combined definitions appear to add additional elements to what was in SIFS2023:3 and we note that;

- The definition for autoplay introduces the characteristic that the player selects a fixed number of plays when initiating autoplay.
- The definition of progressive gaming introduces the characteristic that progressive payouts increase linearly in relation to the bet made.

Both of these definitions include elements which are not currently addressed by SIFS2023:3. If this is intentional, is it intended that autoplay or progressive prizes that do not have these characteristics will fail the technical requirements? Or, is it intended to exclude similar features from needing to meet requirements that refer to the defined features?

Whilst we await clarification, we remain at your disposal to further discuss these matters should you have further questions.

Kind Regards

Iain London
Government & Regulatory Affairs