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Date February 14, 2025
Re Vision on gambling and policy response to the evaluation of the
Remote Gambling Act

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Attachment(s)
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With this letter I inform your Chamber about the way in which I will implement the gambling policy and the measures I will take with regard to remote gambling. In doing so, I will discuss the following subjects:

1. my vision on gambling, the principles I use in this regard and the objectives on the basis of which I will shape the gambling policy;
2. my policy response to the evaluation of the Remote Gambling Act (Wet koa), response to the motion by members Boswijk (CDA) and Van Dijk (SGP), "Gambled and Lost" and the topics for an announced initiative bill by members Bikker (Christian Union) and Van Nispen (SP);¹
3. my proposals for improvement measures with regard to the legal framework for remote gambling.

The following documents are attached to this letter:

1. overview of proposed changes;
2. TNO research System analysis of gambling;²
3. overview of commitments and motions from October 2021;
4. D&B research, Behavioural insights into setting playing limits;³
5. Policy response to research 'Behavioural insights into setting playing limits' and outlines for overarching limits;
6. Report 'Effects on the online gambling market - New rules player protection 2024'.⁴

Key points

Since the introduction of the Remote Gambling Act (Wet koa) in 2021, the protection of people against the risks of online gambling has been at stake.⁵ This concerns in particular the protection of minors and young adults. More people have started gambling online and they spend more together than before legalization. It has now become apparent that the total risk

¹ Chamber Documents II 2024/25, 36628, no. 2. [SP and CU Initiative Bill. Don't gamble with the future of our young people](#)

² TNO (2025). The dynamics of online gambling: adjusting in a self-reinforcing system

³ D&B (2025). Partial report 2, WODC – Behavioural insights into setting gaming limits, interventions.

⁴ Gaming Authority (2025). Effects on the online gambling market – New player protection rules 2024.

⁵ Formal: Act of 20 February 2019 amending the Gambling Act, the Gambling Tax Act and some other laws in connection with the organisation of remote gambling (*Stb. 2019, 127*). Further: Remote Gambling Act (Wet koa).

and problem gamblers is increasing, especially among young adults, and the number of people in treatment for gambling addiction has increased slightly since 2023. This is evident from monitoring studies and reports from the Netherlands Gambling Authority (Ksa), market research, surveys, the Trimbos student monitor, figures from the National Alcohol and Drugs Information System (LADIS), the evaluation of the Ksa Act and the most recent report from the Ksa attached. I find this unacceptable and am committed to reversing this trend.

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To counter these worrying developments, additional measures and tightened legislation and regulations are needed. The current Law on gambling is based on the old vision on gambling from 2011, which took the player's own responsibility and the market as a starting point, and therefore offers too little room for the necessary fundamental changes.

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That is why I am presenting in this letter a new vision for the entire gambling policy, based on different principles.

The assumption under the 2011 vision was that people are also capable of taking responsibility in gambling and that decisions are generally based on a sound thought process. In practice, this translated into limited regulation and great freedom for citizens to decide for themselves what is good. Only for certain vulnerable groups was a greater degree of protection deemed necessary. My vision is fundamentally different on a number of points. Experiences within the market for remote gambling show that the

previously chosen approach is problematic. I attach great importance to protecting people. In this respect, the protection of minors and young adults is particularly important, because they are more vulnerable to the risks of gambling and to prevent further normalisation of gambling. That protection is therefore paramount in my vision and concerns not only the policy on remote gambling, but also the policy on physical gaming machines, scratch cards, lotteries and small games of chance such as bingo.

With the focus on protection, I aim for a more balanced approach to remote gambling. A large proportion of people who want to participate in gambling still do so recreationally and there will continue to be room for this. In addition, the less vulnerable people are and the less risky the gambling in question, the more room there is for the supply of gambling and more room for personal considerations about participating in gambling.

In order to realise protection and to better combat illegality, amendments to legislation and regulations are necessary. In response to the worrying results of the evaluation of the Law on gambling, I give priority to far-reaching amendments to legislation and regulations for remote gambling. These amendment proposals are included in Appendix 1 and are further explained in the third part of this letter. In summary, this concerns:

1. a change in the general principles of the law in which the protection of the citizen is paramount and the addressee of the standard is

6 Including: *Parliamentary Papers II* 2023/24, 24557, no. 239 and no. 240; [Monitoring reports on online gambling - Gaming Authority](#); Trimbos Institute, Student Monitor 2023: [Figures 2023 \(12 to 16 years\)](#); [LADIS figures](#); Dialogic (2024). Three years of online gambling, Evaluation of the Remote Gambling Act.

⁷ Cf. *Parliamentary Papers II* 2010/11, 24557, no. 124.

supplemented so that parties that facilitate illegal gambling can also be addressed directly;

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2. management of the level of risks of specific gambling products, with even stricter restrictions being imposed on the riskiest games of chance, such as raising the minimum age to 21 years;
3. the tightening of the duty of care of providers and the introduction of overarching playing limits for online gambling;
4. adjust the advertising rules and limit advertising to what is strictly necessary, based on the principle of "prohibited, unless";
5. expansion of enforcement and supervisory instruments such as the blacklisting of illegal websites and instruments so that the Ksa can better monitor the gaming environment;
6. improving the functioning of the Central Exclusion Register Gambling (CRUKS) and the exchange and use of data for research purposes.

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I have already initiated the research, analyses and policy compasses that are necessary to prepare the legislative process. When new promising measures emerge from this, I will include them if possible. The central point is that the measures contribute to my spearhead, that citizens and in particular minors and young adults are well protected against the risks of gambling.

1. Vision on gambling

The new vision consists of revised principles, a new mission and sharpened objectives. In order to arrive at a new course and associated legal frameworks, the following steps were taken:

- An analysis has been made of the historical developments in the area of gambling in recent years. • An analysis has been made of recommendations in the area of gambling (particularly remote gambling) over the past three years from various scientific studies and the report of the National Rapporteur on Addictions (NRV)⁹.
- Based on their scientific background, an ethicist, legal sociologist, economist and psychiatrist (the NRV) were asked to provide their provocative view on gambling policy in a pamphlet.
- In two sessions, the principles and preconditions for gambling policy were formulated together with these scientists and the field of stakeholders was mapped out. The second session was also attended by employees of other ministries and the Ksa. • In a third session, the principles were discussed with the broad field of

stakeholders were assessed and discussions were held on the desired goals and activities of the gambling policy.

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8 The standard addressee refers to the group of companies or organisations for which a given standard that must be adhered to in legislation and regulations applies.

9 *Chamber Documents II 2023/24*, 24557, no. 214, Letter Policy Response to the Report 'Gambling with Health, advice on online gambling'

10 The following people attended this meeting: civil servants from JenV, the aforementioned scientists, employees of other ministries, Ksa, addiction experts, experts by experience, representatives of trade associations of providers, state-owned companies Holland Casino and the Dutch Lottery, Geldfit, the Public Prosecution Service, the Consumers' Association, the Association of Dutch Municipalities and the Charity Platform.

- Based on the analyses and input from the sessions, the mission, vision and objectives set.

1.1. Vision principles

The mission and objectives are based on a number of starting points. These are, in short:

1. Protection of civilians

Citizens and in particular citizens in a vulnerable position need protection against negative consequences of gambling.

2. Recognition of the risks of gambling

Gambling involves risks, such as the risks of addiction and financial damage.

3. People gamble

It is a given that people participate in gambling. Citizens must therefore have the opportunity to participate in gambling in a responsible and safe manner.

4. Complete prevention of all gambling-related harm is not possible

We cannot prevent citizens from suffering gambling-related harm, such as addiction or debt, in all cases. Appropriate help and support must be available for these cases.

5. Illegality is tackled

Not all illegality can be eradicated. It is important to combat illegality as much as possible. There are limits to what is feasible.

6. Risk-based protection

The extent (scope) of intervention and protection required depends on the risk associated with the specific games of chance and/or the extent to which the persons involved can take responsibility for themselves depending on their situation.

7. The government cannot do it alone

Protection of citizens is a shared responsibility of all parties that can influence that protection. None of the parties involved can take care of this independently.

The most important starting point for me is that all citizens must be protected against the risks of gambling instead of just players. The previous vision was aimed at protecting the (potential) user of gambling, or the consumer. However, it is necessary to protect everyone, especially those who have not yet come into contact with gambling or who have stopped gambling. In doing so, I go further than the previous aim of preventing addiction and I look at other damage that participation in gambling can cause in a risk-oriented manner. The risks of damage differ per game of chance and per person. I realise that there are always people who want to gamble - and that should be possible in principle, but the greater the risks and the more vulnerable the person, the more important the protection. This also ties in with the consideration that gambling is an activity for which the player is in principle responsible, but for which others also have a responsibility to

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to protect the player. In the previous vision, the player's own responsibility and that of companies were formulated as a starting point.

The previous vision focused on channelling the demand for gambling to attractive legal supply in order to better protect players. 11 I am abandoning this as a starting point, because illegal gambling will always remain more attractive for a certain group of people. Channelisation remains a measuring instrument to monitor developments in the market. The starting point is that illegality is tackled as much as possible. 12 This is necessary both to combat crime and to protect people. Unlike the old vision, this requires a proactive government that sets and enforces rules and also encourages other actors from experts to licensed gambling providers to take their role and responsibility. Not all stakeholders do the right thing on their own.

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1.2. Mission gambling policy

The gambling policy aims to protect citizens against gambling-related harm, such as addiction and debt problems, and I want to prevent that as much as possible. It ensures an appropriate gambling offer, in which social interests are paramount. That is why the policy focuses on a safe and responsible offer in a legal market with a high level of protection. It uses various instruments to prevent, disrupt and punish illegal practices and crime around gambling.

It puts all stakeholders in a position to take responsibility and ensures a clear division of roles in this. Finally, the gambling policy ensures that people who experience gambling-related harm are helped.

1.3. Gambling policy objectives

Based on this mission, I aim for the following objectives:

- Protection of citizens against gambling-related harm;
- Combating gambling-related crime; • Preventing participation in illegal gambling and combating illegal offer.

This means that I am combining the old objective of preventing addiction and protecting consumers and also broadening it to prevention of and assistance with gambling-related harm. The NRV report, the evaluation of the Koa Act and (international) reports from addiction experts all state: look beyond addiction. Participation in gambling (especially risky gambling) can not only lead to addiction, but whether or not resulting from addiction, can also lead to loneliness, debt, depression and suicide. The government is also making efforts to prevent other harm, such as financial harm (which often also points to other types of harm) and social

11 Channelisation is the extent to which players use the legal offer. Channelisation is expressed as a percentage, the channelisation degree, whereby the extent to which players use the legal offer is set against the total participation in gambling (legal and illegal). For the measurement of participation in gambling, for example, the number of players, gross gaming result (BSR) or web traffic can be considered.

12 See also: Dialogic (2024). Three years of online gambling, Evaluation of the Remote Gambling Act, p 170: "Better enforcement of the illegal market, which is therefore less easy to find and less attractive, can create room to also regulate the licensed supply more strictly without a decrease in attractiveness leading to decanalization."

problems and where necessary linking them to the available assistance, such as debt assistance. This protection does not of course extend so far that it removes personal responsibility for choices, but it does impose an obligation to make an effort to prevent damage on all actors. Furthermore, the protection is not only aimed at players, the consumer, but at all citizens.

So also on people who do not (yet) play. In doing so, I focus in particular on the protection of young people: minors and young adults. They come into contact with gambling at a time when they are highly susceptible to influence and are therefore very susceptible to the risks of gambling. For this group, gambling is certainly not an innocent pastime.

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The old objective of consumer protection will thus lapse as an independent objective and will be broadened. This means that not only participants in games of chance must be informed about, for example, chances of winning and that the game must be fair.

Citizens who are not yet participating in gambling should be protected by making them aware of the risks that may be involved. In the case of the most risky forms of gambling, even a discouragement policy is appropriate, including in the case of young adults an increase in the age limit for participation.

I will continue to uphold the objective of combating gambling-related crime and fraud. The regulations on money laundering and the Sanctions Act will be further tightened in the coming years due to EU legal developments.¹³ I believe it is important that the gambling sector remains committed to complying with these regulations.

In addition to tackling fraud and money laundering, it is important to continue to focus on preventing participation in illegal gaming and combating illegal supply. The more strictly regulated the licensed supply, the more efforts must be made to combat illegal supply. Some players look at how (financially) attractive a game is and then switch to illegal supply. This group often experiences the most damage, because the number of risk and problem players is high in this group. That is precisely why it is expressly important to prevent participation in illegal gaming as much as possible and to combat illegal supply aimed at the Netherlands. This is a priority for me and means that not only is the focus on tackling illegal supply, but also access to illegal gaming is combated. To this end, the facilitation of this via media platforms must be combated, illegal advertising must be

prevented and financial service providers should be prohibited from providing their services to illegal parties.

In that light, the channeling rate to legal supply is not the most important instrument to achieve the objectives. It is important to prevent a section of citizens, often the risk and problem players, from switching and escalating their behavior to illegal providers, where no protective measures are in place.

¹³Regulation (EU) 2024/1624 of the European Parliament and of the Council of 31 May 2024 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (OJ L 2024/1624, 19.6.2024).

Directive (EU) 2024/1640 of the European Parliament and of the Council of 31 May 2024 on the mechanisms to be put in place by Member States to prevent the use of the financial system for the purposes of money laundering or terrorist financing, amending Directive (EU) 2019/1937, and amending and repealing Directive (EU) 2015/849 (OJ L 2024/1640, 19.6.2024).

strength. It is not relevant to what extent others at legal providers do play with protection. The relevant question is to what extent access to illegal supply can be prevented. In that sense, channelling is a yardstick, but not an independent instrument to improve the protection of people. This does not, however, affect the fact that licensed providers must adhere to the strict frameworks in order to also realise the intended protection in the legal market.

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1.4. Consequences of new objectives

The new vision that puts the protection of citizens first, results in a more restrictive gambling policy than the current policy. This more restrictive policy leads to restrictions in the supply of gambling. This applies to both legal supply through strict regulations and illegal supply through a tougher and more intensive approach. When elaborating the vision and objectives in legislation and regulations, further choices must be made that determine the degree of restriction. Consider, for example, choices with regard to advertising and/or supply restrictions or choices about the extent to which a discouragement policy is implemented. In this respect, the greater the risks associated with the game of chance in question, the stronger in principle the restrictions and discouragement to participate.

The old vision assumed that gambling markets should be as open as possible, in which competition ensures an attractive legal supply. Now that the new vision assumes that only the necessary supply of gambling games should be offered to meet demand and to guarantee the protection of citizens, it makes sense to maintain the status quo when it comes to the market regulation of the various gambling products. After all, experiences with the opening up of the online market have shown that a good competitive position of market parties always continues to play an important role in the operation of their business and that this can often be at the expense of the interest of the protection of citizens.

A balanced and transparent system must be created for the gambling policy in which the social task of protecting people from the harmful effects of gambling is paramount and all parties involved operate responsibly within clear frameworks. The government ensures clear rules and a system in which all parties know what is expected of them and what they may expect from others. In addition, the government encourages all stakeholders to be put in a position to take responsibility. This is necessary to achieve the objectives. This requires a broad approach from the government, which goes beyond just legislation and regulations. Previously, such a broad approach was not explicitly part of the vision on gambling.

Key stakeholders are the licensed providers in all market segments of gambling, including land-based. An economically healthy licensed gambling market is necessary for the creation of a sustainable and responsible market in which the protection of people is a priority. In order to achieve this, it is necessary that smaller entrepreneurs also retain financial space for innovation and investment in responsible gaming, which ultimately benefits consumers and the economy and which does not unnecessarily deteriorate the competitive position compared to illegal providers.

Various organisations have been advocating for years that contributions to charities (for lotteries) should be an independent gambling objective. I do not opt for this. This is not in line with my vision in which the protection of citizens is central and gambling is treated as activities that entail risks, such as addiction and financial damage. Although these risks are considerably smaller in lotteries compared to risky remote gambling, there are also risks of damage in lotteries. If contributions were to constitute a separate gambling objective, this would introduce an incentive to stimulate participation in lotteries and this is not compatible with my other objectives.

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The principles, mission and objectives apply to the entire gambling policy and will be further operationalised for the various gambling products and markets in the coming years. In connection with the urgency to tackle the worrying developments in remote gambling and the limitations on capacity, I choose to first take measures for the online gambling market.

2. The evaluation of the Koa Act

2.1. Summary of evaluation

The aim of the Remote Gambling Act is to guide the existing and future need for remote gambling towards a responsible, reliable and verifiable supply. This supply should have guarantees regarding the prevention of gambling addiction, the protection of consumers and the prevention of gambling-related fraud and crime. These guarantees would ensure that players within the legal supply are better protected than with illegal providers of remote gambling, who generally do not comply with the rules. The evaluation describes how the policy regarding remote gambling was developed, tests the logic of the policy and addresses the question to what extent the objectives of the Remote Gambling Act have been achieved. The report concludes with recommendations for improving the regulation of remote gambling.¹⁴

The general conclusion of the researchers is that the Remote Gambling Act has not (yet) contributed to such a responsible and verifiable gambling offer that it can be stated that the policy objectives of the remote gambling policy will be achieved in the short or long term.¹⁵ The policy has also led to a large group of new players, including a relatively large number of young adults. Based on the original policy and the established implementation practice, the researchers believe that, particularly in this group, it can be expected that damage will occur in the future as a result of the policy. The Remote Gambling Act has led to a reliable offer and to a degree of verifiability and control that is greater than is the case with illegal offers. The researchers' analyses could not yet include the effects of recent tightening of regulations, such as the Decree on untargeted advertising of remote gambling and the Regulation on gambling limits and more conscious gambling behaviour.

¹⁴ Dialogic (2024). Three years of online gambling, Evaluation of the Remote Gambling Act, p 8
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¹⁵ Dialogic (2024). Three years of online gambling, Evaluation of the Remote Gambling Act, p 165.

The evaluation provides recommendations for improving the Koa Act. In summary, the following recommendations are made:¹⁶

- Research should be done into how the expertise of experts can be used to improve the fulfillment of the duty of care by providers. The fulfillment of the duty of care should be improved, for example by a central addiction prevention policy.
- The aim of addiction prevention should be broadened to include combating gambling-related harm. In order to better protect players from this harm, measures should also be taken in legislation and regulations. More parties should also be involved in gambling policy, such as debt counselling.
- Overarching protection, players must be protected across the entire licensed offering, not just individual providers. For example, through overarching playing limits.
- Research should be conducted into how the current advertising rules for remote gambling can be tightened so that vulnerable people no longer see advertising for remote gambling.
- It should be investigated how bottlenecks with regard to the information sharing on match-fixing and sports disciplinary violations can be solved.
- For the enforcement of illegal supply and supervision of legal supply it is important that the Ksa receives additional enforcement and supervision instruments. For example, the authority to block DNS mystery. ¹⁷ For better supervision, the Ksa would benefit from imposing guest research in the playing environment. Also the possibility of suspending a permit without intention to revoke is recommended.
- In parallel with enforcing illegal providers, the Ksa should make greater use of its authority to issue binding instructions to parties in the ecosystem of an illegal provider, such as a hosting party or payment provider. This is to limit access to illegal providers for players and to reduce the perceived legitimacy. • Cross-provider player data should be made available to research.

2.2. Additional system analysis

In addition to the evaluation of the Remote Gambling Act, I have asked TNO to conduct a system analysis of the remote gambling system.¹⁸ The report shows the importance of effective inhibitory mechanisms to control the growth and problems of online gambling, because a path of excessive gambling behavior once taken can have enormous escalating effects. ¹⁹

This causes damage that is much broader than just the player himself. It should also not be underestimated how great the influence of a social group can be, within which online gambling is seen as entertainment and normal, while it is

¹⁶ Dialogic (2024). Three years of online gambling, Evaluation of the Remote Gambling Act, p 171 and 172.

¹⁷ The Domain Name System (DNS) is the service that identifies a domain name and its IP address a server to each other. DNS blocking is a technique that protects against malicious Internet traffic by blocking domain names that are known to be illegal.

¹⁸ TNO (2025). The dynamics of online gambling: adjusting in a self-reinforcing system. This system analysis visualizes the causal dynamics in consumer behavior and market behavior in relation to policy developments and external influencing factors.

¹⁹ TNO (2025). The dynamics of online gambling: adjusting in a self-reinforcing system, p. 4.

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is about risky gambling. The economic interest of providers fuels this dynamic, because profitability is directly linked to more players and more frequent and higher stakes. In addition, the illegal supply always remains present, which offers an alternative route for players who are discouraged from playing within the legal market by inhibiting measures. This means that early interventions are very important and should not be limited to vulnerable groups. Furthermore, creating an attractive legal supply compared to illegal supply is not of decisive importance for the protection of people. Setting up the right protection levels, timely interventions to prevent escalating gaming behavior and closing off access to illegal supply are

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important.

Based on the system analysis, TNO provides directions for development of policy: 20

- **Game characteristics and playing behavior:** influence by setting limits set playing time, playing speed and other risk-increasing game and platform features that can slow down escalation in gaming behavior;
- **Advertising and recruitment:** further limiting (personalised) advertising and recruitment can further limit the initiation and escalation of gambling behaviour;
- **Duty of care of providers:** limit the escalation of gambling problems as much as possible. Provide clear guidelines for providers for signalling and intervening in risky gambling behaviour. Take into account that gambling behaviour that cannot yet be classified as 'addicted' can also be harmful to the player and the social environment. This requires stricter guidelines and better compliance by enforcement.
- **Integrated signalling and response to problematic gambling behaviour:** by setting up overarching systems for limits, signalling and the use of interventions;
- **Access to care and reducing stigma:** improve the awareness of risks, increase awareness of and access to care, and stimulate openness about gambling problems;
- **Tackling awareness and accessibility of illegal supply:** intensify enforcement and cooperation with commercial parties and international partners to further impede the use of illegal providers. Erect barriers that can reduce the accessibility and awareness of the illegal supply among average players.

These recommendations confirm the need for measures and I have included them in my proposals, which I will discuss in more detail in Chapter 3.

2.3. Report Effects on the online gambling market

The Ksa provides a monitoring report twice a year regarding market developments in remote gambling. I have asked the Ksa to provide an interim overview of the first effects after the entry into force of the Regulation on gaming limits and more conscious gaming behaviour and the Responsible Gaming Policy Rule 2024 as of 1 October 2024.²¹

20 TNO (2025). The dynamics of online gambling: adjusting in a self-reinforcing system, p. 47 and 48.

²¹ Gaming Authority (2025). Effects on the online gambling market – New player protection rules 2024.

The report shows that the protective measures that have been in effect since 1 October 2024 are effective. Players are losing smaller amounts due to these measures.²² There were fears that players might circumvent this measure by creating player accounts with other licensed providers, but the number of player accounts does not appear to be growing faster than before the measures came into effect. The study also examined the impact of the measures on channelling in terms of players. This channelling was high at 95 percent and remains high at 91 percent in the fourth quarter of 2024. There is an effect on the gross gaming result (bsr) of legal providers. This is now approximately 10% lower than before the measures were introduced. It should also be taken into account that some players have switched to illegal offerings.

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In this report, the Ksa has also mapped out how much money is spent on gambling in the licensed market and with illegal providers. ²³

This shows that the canalization in terms of money (bsr) has been overestimated in recent years. At the moment, the canalization in terms of money, partly as a result of the new measures, is 49 percent.

²⁴ Combined with the figures for the channelling of players, this provides the following picture. Ninety percent of players play legally and account for approximately fifty percent of the total expenditure on online gambling. Ten percent of players play with illegal providers. This group is responsible for the other fifty percent of the expenditure on online gambling. This shows that players who spend a lot of money on gambling in particular switch to illegal supply. This group consists to a considerable extent of risk and problem players, which means that the damage caused by gambling is also high here. This confirms to me once again the importance of preventing participation in illegal gambling as much as possible and combating illegal supply aimed at the Netherlands. It is important that a balance is found between improving the protection of people within the legal supply and preventing the influx to illegal supply.

2.4. Policy response

In my letter of 10 October 2024, I indicated what has been done in recent times within the current legal frameworks, such as the ban on the use of role models, the Decree on untargeted advertising of remote gambling (Orka Decree), the Regulation on gambling limits and more conscious gambling behaviour, awareness activities and the establishment of a gambling expertise centre at the Trimbos Institute. ²⁵ However, the recommendations from the evaluation also provide grounds for implementing more fundamental improvements. I endorse the conclusions of the researchers of the legislative evaluation. The evaluation provides a worrying picture of the limited protection of consumers against the risks of online gambling.

²² This amount will decrease from 117 euros per account per month before October 2024 to 83 euros after October.

²³ The Ksa has used a new methodology for this report. Channelisation can be measured in different ways. Until now, the estimates of H2 Gambling Capital were the only source for channelisation in terms of money. Now, the Ksa has another method at its disposal to measure channelisation in terms of money. This method was provided by the Dutch Lottery. The Ksa has validated and calibrated the method with its own data. An explanation of the method and validation is given in a separate document with the report with technical explanation.

²⁴ Since the beginning of 2023, canalization has gradually decreased from an average of 66 percent in the first quarter of 2023 to 57 percent in the third quarter of 2024. After October 1, 2024, canalization has decreased further to an average of 49 percent.

²⁵ *Parliamentary Papers II, 2024/25, 24557, no. 243*

The conclusions show that a licensed market for remote gambling can be of added value for the protection of consumers, but that the current legislation and regulations need far-reaching improvement to achieve this goal. I agree with the recommendations from the evaluation. In combination with the above-mentioned vision on gambling, they give rise to fundamental changes in legislation and regulations, which I will explain in the third part of this letter. In appendix 1

An overview of these measures is included, indicating for each measure which recommendation from the evaluation, motions and commitments it concerns.

With this follow-up, I believe I am also following up on requests formulated by your House in adopted motions, the proposals in the initiative note by members Boswijk (CDA) and Diederik van Dijk (SGP) and the published subjects of the announced initiative bill by members Bikker (ChristenUnie) and Van Nispen (SP).

On one fundamental point I cannot follow the aforementioned motion: this is the proposal to withdraw the Koa Act. The need for this does not emerge from the evaluation and does not fit in with my principles and objectives for the gambling policy. I consider legal supply to be necessary to protect people who want to participate in gambling in a regulated environment. This also follows from the principles that there are always people who want to gamble and that illegal supply can never be completely prevented. I will therefore not make a proposal to withdraw the Koa Act, but will thoroughly revise it and implement significant changes.

3. Proposals for amendments to legislation and regulations regarding

remote gambling I will come up

with amendment proposals for new legislation and regulations for remote gambling as soon as possible.

In order to protect people effectively, measures must be taken in a coherent manner. The riskiest gambling games have an escalating dynamic that cannot be broken with a single measure or tightening of the law.

Various measures are needed that, as a coherent system, have a reinforcing effect on the protection of people. In total, I am taking thirteen measures.

I have divided the measures into themes and explain them below.

3.1 General changes

- In general, changes are needed to bring the foundations in the Betting and Gaming Act into line with the vision that prioritises the protection of people and the prevention of gambling-related harm. This means that the freedom of players to make choices is limited. This also means that the freedom of providers to make choices in the degree of protection and prevention is limited (Measure 1).
- In addition, general changes are required in the standard addressee of the Wok, so that not only providers, but also marketing companies and internet platforms, for example, can be directly and firmly addressed for placing unauthorized advertisements or financial institutions can be addressed for facilitating illegal gambling and the ecosystem of illegal supply can be broken (Measure 2).

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The general changes also include better legal anchoring of differences in risks of gambling (Measure 3).

- Finally, I will anchor the protection of young people more firmly in law by raising the minimum age for participation in the riskiest games of chance to 21 years (Measure 4).

3.2. Further specification and tightening of the duty of care of providers and introduction of overarching playing limits

- The duty of care has already been further defined and specified with guidelines for when providers must intervene and inform via the Regulation on gaming limits and more conscious gaming behaviour and the Responsible Gaming Policy Rules 2024.²⁶ I will further specify and tighten the duty of care (Measure 5). I will do this partly on the basis of the effects of the previous tightening. I expect that the change is partly possible in lower regulations, but it must be investigated whether important frameworks are required at the level of law or general administrative order. The renewed duty of care rules are based on research and advice from independent experts. I will also include the Van Nispen cs motion in this, to see what is needed to take more effective and robust action against gambling companies that fail in their duty of care and addiction prevention policy.²⁷
- The law evaluation recommends that functionalities with regard to gaming behaviour be introduced that transcend providers. Partly in response to the Bikker cs motion, I have investigated how overarching gaming limits can be made possible.²⁸ Based on this research, I opt for the introduction of an overarching deposit limit with a financial capacity test (Measure 6). In addition, there will be a central functionality where the gaming limits of players are registered and maintained. A capacity test will then be built in when players want to play above a limit. The contours of overarching gaming limits have been worked out and are further outlined in the appendix to this letter. Further overarching measures will only be considered when it becomes apparent that the above is not sufficiently effective.

3.3. Further restricting advertising for remote gambling

- I will impose a “no, unless” ban on remote gambling advertising set up. This will allow for better control over which advertising is permitted and will make supervision and enforcement easier for the Ksa (Measure 7). • Further research into the operation of the Orka Decree is required for the interpretation of “unless”. It is important to see to what extent targeted advertising should still be permitted, for example through personal messages. In light of the idea that only necessary advertising is permitted and to prevent displacement effects to other marketing, bonuses and promotional games of chance are also being examined. Finally, I would like to make a distinction between the warning text that applies to risky and less risky games of chance (lotteries). In this respect, it is also important to first gain insight into the effects of a warning text.

3.4. Expansion of the powers of the Ksa to combat illegal providers

²⁶ Responsible Gaming Policy Rule 2024 (*Stcrt. 2024*, 18177)

²⁷ *Chamber Documents II*, 2023/24, 36410-VI-63

²⁸ *Chamber Documents II*, 2023/24, 36410-VI60

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to tackle and expand powers for supervision of legal supply

- With regard to enforcement, the powers of the Ksa are expanded to be able to take better action against illegal providers.
- This concerns the ability to blacklist or block websites and to hold third parties, such as providers or banks, liable for offering their services to illegal providers (Measure 8). • It is also being examined how the supervisory gap in which the Ksa currently does not exercise direct supervision within the gaming environment can be removed. It is not yet clear whether it is possible to set up false identities for this purpose. It is also questionable to what extent an amendment to the Betting and Gaming Act is sufficient to regulate this authority (Measure 9).
- To improve enforcement within the licensed supply, an authority is created to independently suspend permits, without the need for an intention to withdraw the permit (Measure 10).

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3.5. Measures that better facilitate research and prevention

- Adjustments to CRUKS can facilitate addiction prevention. Various proposals have been made to make CRUKS work better in the case of voluntary and involuntary exclusion in motions, reports and by the Ksa. I want to improve the functioning of CRUKS. This involves faster, for example conditional, registration in CRUKS in the case of involuntary registration, extending the minimum registration period and monitoring people who want to gamble again after the registration in CRUKS has ended (Measure 11).

The evaluation indicates that the information exchange around match-fixing must be improved.²⁹ One of the problems here is that information about match-fixing must often also be reported to the Financial Intelligence Unit (FIU) on the basis of anti-money laundering legislation. However, reports to the FIU in the context of anti-money laundering legislation prevent further provision of that information. Further analyses are required to see whether and how this can be solved.

There are dependencies here with regard to legislation and information sharing within the integrity of sports and information sharing of suspicions of money laundering. I will look to what extent information sharing can be improved within my policy area and seek cooperation with the necessary colleagues where other policy areas are concerned (Measure 12).

- I share the widely supported desire to make data available for research. That is why I am creating a basis in the Wok for the use of data from the control database (CDB) at the Ksa for research purposes. It also concerns the pseudonymous ability to obtain data for scientific research in order to be able to follow players across providers in this way (Measure 13). I also include the motion by Member Ceder (CU) to grant the National Rapporteur on Addictions access to the same data as the Gaming Authority so that it can conduct research into gambling behaviour and gambling addiction.³⁰

3.6. Implementation and planning of policy changes

All measures mentioned must be based on a sound problem analysis. It must also be substantiated that the chosen

²⁹ Dialogic (2024). Three years of online gambling, Evaluation of the Remote Gambling Act, p 167.

³⁰ Chamber Documents II, 2024/25, 36600-VI-104

solution contributes to the policy objectives in a proportionate manner. This substantiation will be drawn up on the basis of the policy compass and underlying research. The realisation of the measures described above is central to this. In addition, I will look with an open mind at any additional measures that may emerge from the research and discussions with experts. In the most favourable scenario, after completion of the above-mentioned research and going through the policy compasses, I can start formulating the legal texts and the explanations thereof at the end of 2025.

I do not foresee completion for consultation before 2026.

In this respect, limited capacity must be deployed efficiently. Stacking legislative processes would take up much more time and could undermine the necessary logical coherence of the legislation. Precisely to prevent this, it is advisable to make a proposal once to amend the Wok after the legislative evaluation. It must also still be taken into account that legislative capacity is limited by legislative priorities set in the main lines agreement and government programme. With regard to the available policy capacity, choices must also be made in this respect compared to other subjects. For the gambling policy itself, it applies that other (possible) policy changes, such as those regarding gaming machines or lotteries, cannot be addressed for the time being.

The implementation of changes may have (financial) consequences and possible impact on the national budget and on the state participations Nederlandse Loterij and Holland Casino. I will map this out in the course of the further elaboration. The financial consequences for the Ksa are covered within the budget of Ksa and if necessary by JenV.

3.7. Acceleration options

When drafting the amendment proposals, I specifically had research done into where acceleration is possible, because I share the view with your Chamber that subjects such as further restrictions on advertising and more enforcement instruments are urgent. A prerequisite for an acceleration of parts of the Wok is that the necessary research has been done for these parts and that the coherence of regulations is safeguarded. That is why I cannot make any other commitment regarding an acceleration of legislation than that I will take this up as soon as possible.

It is possible to adjust lower regulations within the current legal framework. The old principle of the player's own responsibility and the market still applies. This can entail risks of inconsistencies at a later time. With this risk of later inconsistencies in mind, the first effects of the tightened Responsible Gaming Policy Rule 2024 (of the Ksa) and the Regulation on gaming limits and more conscious gaming behavior will be further mapped out in the coming months.

Based on the results of this, it will be examined whether further changes are desirable and possible regarding the duty of care, via policy rules or a ministerial regulation, which can be realised more quickly than a change in the law or a general administrative measure. Any changes could, depending on the nature and scope, still be brought to a consultation version in 2025. Possibilities can also be examined to include very risky elements in the range of games offered within the current legal framework.

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name to ban online slot machines. This requires further research into these elements. This research has been requested from the WODC and is expected to be available in the second half of 2025 at the earliest.

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Finally

I am undertaking a fundamental change to the rules for remote gambling in the Gambling Act. In order to effectively protect citizens and to combat gambling-related crime and illegal supply, this must be a coherent package of measures. The new vision forms the basis and the assessment framework for the proposals. In this letter, I have indicated to you the topics on which I want to make changes and for what purpose. I want to have developed and substantiated concrete policy proposals for changes by 2025 and then submit a proposal for a change in the law for consultation as soon as possible in 2026.

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In addition to the process of legislation and regulations, I will continue to work on other important activities that contribute to better protection of people against the risks of gambling. These include awareness activities and improving and broadening knowledge about the risks of gambling. They also include improving addiction prevention and the broader deployment of the network of care and support providers around addiction.

I am also exploring how we can take a stand against illegal supply at an international level. I want to see the approach to illegal supply on the agenda, particularly at a European level. I believe it is important that broad expertise is then used in this and that various disciplines (criminal law, private law, ICT law) are involved. Illegal supply cannot be countered by tackling the providers themselves. It is also important that financial service providers, such as banks, internet platforms and other facilitators, no longer do business with these illegal providers. In this context, the Netherlands Gambling Authority is organising an international conference on safer gambling in September 2025. This conference will bring together gambling market regulators from mainly European countries to arrive at joint intentions and exchange knowledge in order to make the gambling market safer.

Finally, the vision on gambling outlined in this letter requires further operationalisation in policy towards concrete sub-objectives, such as gambling-related harm, gambling addiction and combating illegal supply and the way in which these sub-objectives can be achieved. It is also important to draw up indicators and to perform a zero measurement in order to subsequently be able to measure the effects of the policy changes and the realisation of the objectives. I will include these aspects in the periodic reporting of the gambling policy in 2026.

The State Secretary for Legal Protection,

THD Struycken