



MANIFESTO

Winning together: a pledge to fight crime, protect consumers, and support the EU's competitiveness

SUPPORT

The ECA pledges to support the EU in providing a safe and regulated environment and calls on European policymakers to collaborate with the ECA to **tackle the dangers of illegal (unlicensed) gambling operators**, including those involved in criminal activities.

PROTECT

The ECA aims to fully protect the **safety and well-being of European consumers** by providing a safe and regulated environment as set up by the Member States.

PROMOTE

The ECA's members promote economic growth and support local communities by creating jobs, paying taxes and supporting social projects. As its members are licensed, legal and highly regulated companies, the ECA advocates for a **fair economic and financial framework** for land-based casinos and their online operations to continue contributing to national GDPs and the EU's overall economic competitiveness.

Supporting the EU and its member states in the fight against crime

The ECA is committed to fighting illegal land-based and online gambling operators, enhancing anti-money laundering regulation and supporting effective implementation of the Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Package. For the success of this mission, the ECA urges policymakers to recognise the impact of illegal operators in Europe and collaboratively take measures to eliminate them.

THE ISSUE

A recent study by Yield Sec (yieldsec.com), commissioned by the ECA, has revealed a concerning trend. During the first half of 2024, approximately 70% of online gaming revenue in EU member states, around €32 billion, was generated by illegal operators without the necessary gaming licenses. Additionally, the ECA estimates that illegal land-based gaming operators in the EU generate up to €10 billion. As a consequence of these illicit activities, national governments across the EU are missing out on over €10 billion in annual tax revenue. This situation not only undermines the regulated market but also poses significant challenges to consumer protection and fiscal stability within the Union.

WHAT IS THE INDUSTRY DOING ABOUT IT?

The ECA's membership comprises nationally licensed land-based casino operators, many of whom also hold licences for online distribution channels. These members adhere rigorously to a comprehensive regulatory framework, encompassing national laws, European directives, and international standards such as the AML/CFT Package. In their commitment to maintaining industry integrity, the ECA and its members collaborate closely with local, national, European, and international authorities and regulators to combat criminal activities within the European gaming sector.

THE ECA'S CALL TO THE EU

To fight illegal land-based and online operators, European policymakers should acknowledge and address the existence and negative impact of these illegal activities in Europe:

- The Commission must ensure effective implementation and enforcement of the AML/CFT Package and reinforce Europol;
- The Commission should make it clear that gambling providers require national licences from the countries in which they offer their services.

- EU policymakers should **assess any new legislation** based on risk analysis and ensure a proportionate approach and **workable implementation**, avoiding **unintended consequences** that could negatively impact the regulated industry or inadvertently **increase the attractiveness of illegal gaming offers**;
- To allow for the necessary controls, monitoring and enforcement of national court judgements concerning the gaming sector in all EU member states, the ECA fully supports the 1992 Decision of the European Council on the **subsidiarity principle for the gaming sector**, as reaffirmed in the Schindler case (C-275/92) by the European Court of Justice.

Guarantee a safe environment for all consumers

The ECA's mission is to prioritise safeguarding European consumers' safety and well-being. We actively engage with European and national policymakers, along with relevant authorities, in a collaborative dialogue aimed at combating illegal operators and mitigating the risks they pose to the industry and society.

THE ISSUE

Illegal gambling's threat to consumer safety. Illegal operators pose a significant risk to consumer protection because they function outside the bounds of legal safeguards and regulatory oversight. Some have no licenses at all, others have licenses from countries without legal relevance in the country where their illegal gaming products are offered. These illicit activities compromise player safety, undermine the integrity of the gaming industry, and circumvent the robust protections offered by licensed and regulated gambling markets.

These illicit activities often **bypass crucial national and EU regulations**, such as mandatory ID and AML checks, control checks on user behaviour and **measures designed to protect consumers** showing signs of distress. As a result, illegal operators contribute to an environment where safety, compliance, and well-being are severely compromised, undermining efforts from licensed and legal operators to protect individuals and society.

WHAT IS THE INDUSTRY DOING ABOUT IT?

To ensure the protection of consumers, the ECA's members:

- fully comply with all applicable national and EU laws and regulations;
- have established a Responsible Gaming Standard framework, which includes measures to detect, support and exclude vulnerable consumers;
- abide by a Code of Conduct and undergo audits by national authorities;
- dedicate special focus to young adults;
- require licensed land-based casinos – which have expanded into online businesses – to apply the same high security and safety standards for their online operations, drawing on the industry's decades of business experience.

THE ECA'S CALL TO THE EU

To fully protect the safety and health of European consumers, EU policymakers should:

- Fight illegal operators by reinforcing Europol and supporting national competent authorities;
- Advocate for rigorous implementation of the Digital Services Act (DSA) (Regulation (EU) 2022/2065) to prevent legal social media platforms from inadvertently promoting illegal gambling activities through their advertising channels;
- The ECA strongly endorses the subsidiarity principle in gaming regulation, as established by the 1992 European Council Decision, the European Court of Justice's Schindler case (C-275/92) ruling, and subsequent case law. These precedents affirm that national authorities and legislators are best positioned to determine appropriate levels of consumer protection in gaming and implement specific protective measures and restrictions. This approach ensures that gaming regulations are tailored to each Member State's unique context, maximising effectiveness and responsiveness to local needs.

Support the EU's economic competitiveness

Land-based casinos are legal and highly regulated companies. The ECA wishes for a **fair economic and financial framework** for land-based casinos to continue contributing to national GDPs and the overall EU's economic competitiveness.

THE ISSUE

Illegal gambling operators deprive EU member states of more than €10 billion in tax revenues annually, undermining fair competition and flouting regulatory standards. These illicit entities create an **uneven playing field**, disadvantaging licensed operators who diligently adhere to regulations and contribute their fair share in taxes.

Paradoxically, legitimate gaming businesses often face restricted access to essential banking services due to financial institutions' tendency to "de-risk" by avoiding clients requiring additional AML due diligence. **This practice stifles growth and innovation** within the legal gaming sector.

Conversely, illegal operators expand their market share by leveraging unregulated financial channels, including proceeds from criminal activities and cryptocurrencies. The resulting economic landscape not only hampers the development of law-abiding businesses but also **bolsters the illegal gambling market**, posing broader risks to economic integrity and consumer protection.

WHAT IS THE INDUSTRY DOING ABOUT IT?

Licensed land-based casinos provide **high-quality employment opportunities**, including training and career development in the hospitality and services sector. They make significant **contributions to the economy** not only through tax payments but also by **offering socio-economic benefits**, such as fostering job creation, boosting tourism, providing diverse entertainment options, offering innovative products and experiences, supporting charitable activities, sponsoring culture, sports and the arts, and preserving cultural heritage.

THE ECA'S CALL TO THE EU

To fully harness the industry's economic potential for the prosperity of national and the EU's economies:

- European policymakers should support Member States in regaining full control over all gambling services, so that laws, regulations and protective measures can be efficiently applied again.
- European policymakers should ensure a **fair economic and financial framework** for land-based casinos to continue responding to consumer demands. ECA member's casinos are legal, licensed and highly regulated companies and, therefore, should be entitled to **access capital investment and proper bank services**;
- The ECA and its members remain steadfast in their commitment to upholding rigorous standards and continuous improvement of AML procedures. The European Commission's supranational AML risk assessment (SNRA) underscores the sector's diligent efforts. The Commission's report classifies licensed land-based casinos at a medium risk level (level 2). We strongly advocate for **retaining this level 2 classification in the upcoming fourth review of the SNRA**, recognising our continuous efforts and achievements in mitigating financial crime risks.

About the ECA

700

CASINOS

70,000

EMPLOYEES

29

COUNTRIES

The European Casino Association (ECA) represents national associations and individual operators of licensed land-based casinos, including their online licensed businesses in Europe.

The ECA, representing nationally licensed casino operators, champions a threefold mission: to support EU policymakers and Member States in combating gaming-related crime, to ensure a secure gaming environment for all patrons, and to enhance the EU's economic competitiveness in the global tourism and hospitality industry. Serving as a vital liaison, the ECA aims to facilitate seamless communication between its members and EU institutions, fostering collaborative efforts to achieve these crucial objectives.

Drawing on its extensive experience in sustainable business practices, the ECA and its members aim to be reliable sources of industry insights for European policymakers. We offer expertise in EU-regulated areas such as anti-money laundering and advocate for balanced, effective, and enforceable regulations in the gaming sector.

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