Public consultation on the Green Paper on on-line gambling in the Internal Market

You are invited to reply to the on-line questionnaire. The questions listed in the Green Paper are reproduced in the same order hereunder. A pdf version of the Green Paper is available in all EU languages for guidance to the questions.

There are 51 questions in the consultation document. You may reply to those questions in any one of the EU languages. You may focus your contributions on the areas of most interest to you; you are not obliged to answer all the questions.

Please save this document on your computer. Once you have completed the questionnaire, come back to the on-line questionnaire. You will be able to upload your answers on page 3 of the on-line questionnaire.

The consultation will close on 31/07/2011.

We thank you for your participation.

Your name / Your organisation:

Nick Papadakis, webmaster cosmicway.net, secretary panefil.com

Questions from the Green Paper on on-line Gambling in the Internal Market

1. Regulating on-line gambling in the EU: Recent developments and current challenges from the Internal Market standpoint

1.1. Purpose of the consultation

1.2. On-line gambling in the EU: current situation

Are you aware of any available data or studies on the EU on-line gambling market that would assist policy-making at EU and national level? If yes, do the data or study include licensed non-EU operators in the EU market?

Our horse racing portal cosmicway.net publishes regularly the views of people who participate in the games of chance. Our editorial policy on these matters is to support the consumers views but also to try to make them compatible with government objectives, national objectives and specific sports industry related objectives, to the extent that this is possible.

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(2) Are you aware of any available data or studies relating to the nature and size of the black market for on-line gambling services? (Unlicensed operators)

Black market existed in Greece up to approximately the year 2000. After 2000 gambling goes on in the national outlets as well as through the internet. Black market continues to exist but with much lesser intensity as a result.

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(3) What, if any, is your experience of EU-based on-line gambling operators licensed in one or more Member State and providing and promoting their services in other EU Member States? What are your views on their impact on the corresponding markets and their consumers?

In Greece the licensed operators are OPAP (football) and ODIE (horse racing). Internet providers do not need license but this may become the case under new law proposed by the government (announced in March 2011). My experience with OPAP and ODIE is positive with respect to quality of service. Some improvements are called for. OPAP once a year or once every two years makes some improvements but the horse racing authority ODIE appears to be very slow indeed in bringing those about and sometimes unnecessarily recalcitrant. My experience with respect to OPAP in terms of prices is extremely negative and my experience with ODIE less so, although ODIE seems to be under some pressure to reduce prices and thus make participation in the betting problematic.

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(4) What, if any, is your experience of licensed non-EU on-line gambling operators providing and promoting their services in EU Member States? What are your views on their impact on the EU market and on consumers?

I have personally placed a few wagers with eurobet.com several years ago and also with betfair. My experiences are positive w.r. the quality of service.

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<table>
<thead>
<tr>
<th>(5)</th>
<th>If any, which are the legal and/or practical problems that arise, in your view, from the jurisprudence of national courts and the CJEU in the field of online gambling? In particular, are there problems of legal certainty on your national and/or the EU market for such services?</th>
</tr>
</thead>
</table>
| The legality of internet providers will come into question under the new law, as there will be license requirement. Those without license will of course be illegal, if somehow they do not discontinue providing services.

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<table>
<thead>
<tr>
<th>(6)</th>
<th>Do you consider that existing national and EU secondary law applicable to online gambling services adequately regulates those services? In particular, do you consider that coherence / consistency is ensured between, on one hand, the public policy objectives pursued by Member States in this field and, on the other hand, the national measures in force and/or the actual behaviour of public or private operators providing on-line gambling services?</th>
</tr>
</thead>
</table>
| At present there is no law in Greece that makes it illegal. It is however illegal to act as an intermediary. If I were to accept any monies from somebody to place money on a selection I 'd be breaking the law and considered as "black marketeer". Even if it was for the sake of a simple friendly arrangement. On the other hand as an individual I am allowed under the existing law to bet as much as I want in the internet, even if everyone knows I do that. The new law seeks to change this, placing the requirement of a license to the operators.

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** Other comments on issues raised in section 1 **

Consumer rights are violated by the monopolies in a very bad way. The internet companies seem to have problem with the inland revenues, because they do not pay tax to the client's country. This needs to be fixed without affecting prices, but saying that monopolies are good, stands logic on its feet.

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2. Key policy issues subject to the present consultation

2.1. Definition and organisation of on-line gambling services

(7) **How does the definition of on-line gambling services in the Green Paper differ from definitions at national level?**

The national level definition is still awaited.

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(8) **Are gambling services offered by the media considered as games of chance at national level? Is there a distinction drawn between promotional games and gambling?**

They are considered the same in Greece as far as I know.

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(9) **Are cross-border on-line gambling services offered in licensed premises dedicated to gambling (e.g. casinos, gambling halls or a bookmaker's shop) at national level?**

Not in Greece.

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(10) **What are the main advantages/difficulties associated with the coexistence in the EU of differing national systems of, and practices for, the licensing of on-line gambling services?**

The advantages are for the user of those services, because the competition offers better value. The disadvantages are because of tax and because specific sports industries may be hurt by
competition if remedial measures are not taken.

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** Other comments on issues raised in section 2.1

Some midway solution should and can be found. Allowing the monopolies to stangulate the consumer, which is what they want and they are not mincing words about it as we all know, is most unfair indeed.

2.2. Related services performed and/or used by on-line gambling services providers

(11) With focus on the categories mentioned in the Green Paper, how are commercial communications for (on-line) gambling services regulated for at national level? Are there specific problems with such cross-border commercial communications?

The government wishes to control each and every transaction. Government wishes to act as a "compliance authority" in other words.

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(12) Are there specific national regulations pertaining to payment systems for on-line gambling services? How do you assess them?

Those regulations are still in the making in Greece.

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(13) Are players' accounts a necessary requirement for enforcement and player protection reasons?

They can be useful but abuse is also likely by the operators.

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(14) What are the existing national rules and practices relating to customer verification, their application to on-line gambling services and their consistency with data protection rules? How do you assess them? Are there specific problems associated with customer verification in a cross-border context?

The Greek national companies have no such rules at all in their off line outlets. Everything is done with cash. They do not provide any internet betting services at all, but the way they operate makes money laundering dead easy. This is not the case with any of the internet companies, EU or non EU. Money laundering through some conspiracy may be possible but with Greek OPAP it's dead easy. In Greece, OPAP (the football betting organization) provides tax certifications as well to the winners (who may or may not be money launderers). The horse racing organization ODIE do not provide tax certifications of any kind hence its usefulness as a probable "money laundering machine" does not exist. But OPAP is vulnerable to it and some years ago a list with the names of numerous possible money launderers was published (the "Kanelli list"). If European courts have ever accepted statements and depositions of OPAP representatives about "internet money laundering", it is a joke.

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Other comments on issues raised in section 2.2

The technical issues should be addressed and the simplest possible yet effective solutions should be found and applied.

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2.3. Public interest objectives

2.3.1. Consumer protection
Problem gambling should be addressed by the education system and not through prohibitions. Also the victims of problem gambling should be helped by specially made institutes.

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They are inefficient as long as any gambling continues to exist. The only efficient method is to educate the people about the dangers of excessive behaviour.

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There is the gamcare organization based in UK who are doing something for problem gambling. In Greece there is absolutely nothing whatsoever.

In the year 2002 the government of Mr. Simitis spent a sizeable sum of 500,000 euros to finance research on problem gambling. Prompted by this me and a number of associates in the PANEFIL friends of racing group, held a "round table discussion" in the TV channel HIGH (page http://www.high.gr). I took the video to the university where the research group was working and submitted it, as a form of help. The university professor accepted me very politely and I gave him the video. I proceeded to enquire about future publications of his group on the subject and my interest to view them. THERE WAS NEVER ANY PUBLICATION OF ANY TYPE, BOOK OR WEB PAGE. Although the university staff appeared highly competent, judging from their previous appointments also, they published nothing and it is pretty obvious that the government DID NOT LET THEM PUBLISH. In the year 2007 former sports minister Mr. George Orfanos, published a tiny yellow leaflet with the "rules against gambling addiction". In my estimate he was prompted to do so either by some EU officials, or by the words of a judge or advocate in one of the numerous European court hearings. That's all we ever saw about "gambling addiction" coming from the government side. It is of course not difficult for people to enter the gamcare website and others similar and gain information, but the Greek government are paying lip service and they are using it as a flimsy excuse to justify the national monopolies.

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<table>
<thead>
<tr>
<th>(18)</th>
<th>Are there recognised studies or evidence demonstrating that on-line gambling is likely to be more or less harmful than other forms of gambling for individuals susceptible to develop a pathological gaming pattern?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ease of access means more frequent gambling. People should be educated.</td>
<td></td>
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</tbody>
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<tr>
<th>(19)</th>
<th>Is there evidence to suggest which forms of on-line gambling (types of games) are most problematic in this respect?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Those that play non-stop plus offer seemingly easy win opportunities e.g., black-white. People should be educated.</td>
<td></td>
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<tr>
<th>(20)</th>
<th>What is done at national level to prevent problem gambling? (E.g., to ensure early detection)?</th>
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<tbody>
<tr>
<td>In Greece, absolutely nothing, ever. Also, it is a falsehood that the minors are the danger group. The minors of today are the future danger group. The real danger group are people in the early stages of their working careers, when they start making money. The percentage of those who participate in gambling and become problem gamblers is of the order of 2%. There is no doubt that education is needed. At this time, monopoly operators inhibit and infringe education efforts. Private operators may be inclined to behave likewise but do not have the power to influence the legislators to inhibit and infringe education like the monopolies do.</td>
<td></td>
</tr>
</tbody>
</table>

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Is treatment for gambling addiction available at national level? If so, to what extent do on-line gambling operators contribute to the funding of such preventive actions and treatment?

The qualified hospitals in Greece without any doubt are familiar with the problem and have the best doctors to help people. What is absent, totally absent is education to prevent gambling addiction.

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What is the required level of due diligence in national regulation in this field? (e.g. recording on-line players' behaviour to determine a probable pathological gambler?).

This is police action, against "friend" and "foe" alike. Unacceptable. There should be national centres though where one can seek help and advice, anonymously as well as by turning up in person.

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What is the statutory age limit for having access to on-line gambling services in your Member State? Are existing limits adequate to protect minors?

The limit is 17. This is correct but it has no effect as it is not accompanied by education. The teenagers in any case do not have a lot of money and it is those people at the early stages of their working career who are the biggest "danger group". When they had no previous education it means things become dangerous for them, in the absence of a moral or religious inhibition that might keep them away. I am one of the two or three most experienced people in Greece in the field of sports betting. My job is to give selections in an effort to help my readers to win, so I met very large numbers of people from the time I began this in the year 1985 till now. The percentage of problem gamblers needing medical advice is in my estimate about 2% and not higher. At the same time the percentage of people who have no knowledge of basic gambling laws and can as a result suffer serious but not lasting economic setback is a staggering 90% and that includes university graduates!

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(24) Are on-line age controls imposed and how do these compare to off-line 'face-to-face' identification?

The possession of bank cards is regarded a proof of age. To make use of scratch cards, as I did once, the internet company asked me to mail photocopies of age and residence certificates, which I did.

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(25) How are commercial communications for gambling services regulated to protect minors at national or EU level? (e.g. limits on promotional games that are designed as on-line casino games, sports sponsorship, merchandising (e.g. replica jerseys, computer games etc) and use of social on-line networks or video-sharing for marketing purposes.

Advertisements can be seen by anyone but minors cannot enter licensed premises.

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(26) Which national regulatory provisions on license conditions and commercial communications for on-line gambling services account for the risks described in the Green Paper and seek to protect vulnerable consumers? How do you assess them?

Very little relevance to the real problem in view of my earlier replies.

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Other comments on issues raised in section 2.3.1

The risk (problem gambling) exists and it should be addressed. It is, on a population-proportional basis, overinflated and the reports are excessive. The risk with national monopolies is the same if not worse.

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2.3.2. Public order

(27) Are you aware of studies and/or statistical data relating to fraud and on-line gambling?

OPAP is the only one. Unintentionally no doubt. The money launderers do not necessarily go after big money, because it's hard to find and because in this case the true winner will be left in a difficult position himself by taking the cash. Instead they go for lots of medium to medium high sums, they submit the winning tickets to OPAP, cash them and gain for themselves the desired certificates as well.

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(28) Are there rules regarding the control, standardisation and certification of gambling equipment, random generators or other software in your Member State?

The new law deals with things of this nature.

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(29) What, in your opinion, are the best practices to prevent various types of fraud (by operators against players, players against operators and players against players) and to assist complaint procedures?

Plastic cards. Above a certain minimum the payout should be done to plastic card and no cash. Hence it'll be in my name and I cannot do "money laundering".

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(30) As regards sports betting and outcome fixing - what national regulations are imposed on on-line gambling operators and persons involved in sport
Sports fixing is made up of a number of component situations. These are:

a) Syndicated punters cheating the bookmakers/exchanges.
b) Syndicated punters cheating the tote systems (the other players that is).
c) Bookmakers cheating their customers.
d) Non gambling related (i.e. because of championships-relegations).

Fixed matches always existed. Even in the 50s and 60s when there was no football betting as such. Some of the old stories maybe untrue but it is certain and beyond doubt that the stories exist and created the atmosphere of scandal.

To make these things disappear or at any rate to limit the possibility of match fixing, the method is this:

a) Make all games of chance tote type (mutual).
b) The use of player cards
c) Prohibit professionals from participating (i.e. football players, jockeys, managers, horse trainers, horse owners). May be they will start looking for ways to bend the rules, but it will not be very easy, the way it is now.

At present if and when the law "gets lucky", the perpetrators of actions such as the above, against the integrity of the sports, are punished.

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(31) **What issues should in your view be addressed in priority?**

Consumer pprotection and sports integrity.

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(32) **What risks are there that a (on-line) sports betting operator, which has entered into a sponsorship agreement with a sports club or an association, will seek to influence the outcome of a sports event directly or indirectly for profitable gain?**

Very possible indeed, with or without said sponsorship.

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What concrete cases are there that have demonstrated how on-line gambling could be used for money laundering purposes?

The Kanelli list. This was because of the cash only OPAP payment.

Which micro-payments systems require specific regulatory control in view of their use for on-line gambling services?

The Greek national banks require certification for large amounts of money, whatever their origin.

Do you have experience and/or evidence of best practice to detect and prevent money laundering?

The writing of names on coupons in high street premises might help towards this. But it will bring the entire system into a virtual standstill. If we start today (Sunday) then we finish Sunday next year. Only the redeemable plastic player card can be effective.

Is there evidence to demonstrate that the risk of money laundering through on-line gambling is particularly high in the context of such operations set up on social web-sites?

No because we have to give our names. In the countries where the companies are registered there are some compliance authorities also. It's possible but requires the setting up of a truly big conspiracy and the coalescence of quite a few collaborators.
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(37) Are national e-commerce transparency requirements enforced to allow for illegally operated services to be tracked and closed? How do you assess this situation?

Those services that will be deemed non-compliant will not be serviced by the banks.

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Other comments on issues raised in section 2.3.2

The issue of sports integrity is as old as the planet earth and certainly something has to be done about it. Nowadays the law acts only when "customer cheats bookmaker", quite possibly because the bookmakers keep names-addresses-details of financial transactions. But there are more possibilities. The issue of money laundering is over-inflated. In the case of cash-only outlets money laundering is known to take place, not because the operators of those outlets want this to happen, but because their system is inefficient.

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2.3.3. Financing of benevolent and public interest activities as well as events on which online sports betting relies

(38) Are there other gambling revenue channeling schemes than those described in the Green Paper for the public interest activities at national or EU level?

Some small percentages go to benevolent activities. Medical research for example. National monopoly companies as well as bookmaker companies make donations from time to time. In some cases it is not really donation, because there is some reciprocal advertising taking place (such as football team shirts). In other cases it is worthwhile social causes, such as hospitals and research. In other cases it is groups of individuals who have gained the company's approval and the donations are filtered to private purses. The above apply to national monopolies and bookmakers alike.
Is there a specific mechanism, such as a Fund, for redistributing revenue from public and commercial on-line gambling services to the benefit of society?

Small sized funds exist, that donate to government backed organizations and groups.

Are funds returned or re-attributed to prevention and treatment of gambling addiction?

It is possible that some of the donations go to psychiatric hospitals but not known to me.

What are the proportions of on-line gambling revenues from sports betting that are redirected back into sports at national level?

The Greek national betting company OPAP nowadays redirects very small proportions of the order of 1% and some more for advertisement on team shirts, stadium banners.

Do all sports disciplines benefit from on-line gambling exploitation rights in a similar manner to horse-racing and, if so, are those rights exploited?

No. Horse racing on the other hand depends entirely on gambling and so it has to be financed.
consumers of gaming products are thoroughly neglected. I will try to cover this in "other comments" and this signature will accompany my answers to all the other questions in lieu of protest.**

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Other comments on issues raised in section 2.3.3

With the exception of horse racing, other sport is in no dire need of donations from gambling companies. The question how the profits of gambling organizations of various types are spent is excessive, in free economies. Also, to the extent that national monopoly companies
2.4. Enforcement and related matters

(46) Which form of regulatory body exists in your Member State and what are its competences, its scope of action across the on-line gambling services as defined in the Green Paper?

The new Greek law will set up such an authority.

(47) Is there a national register of licensed operators of gambling services? If so, is it publicly accessible? Who is responsible for keeping it up to date?

OPAP - ODIE for now in Greece. A list of licensed operators will exist in the future and the Ministry of Finance will be keeping the records if the new law is enacted.

(48) Which forms of cross-border administrative cooperation are you aware of in the domain of gambling and which specific issues are covered?

I know of the IBAS for gambling disputes.
(49) Are you aware of enhanced cooperation, educational programmes or early warning systems as described in the Green Paper that are aimed at strengthening integrity in sport and/or increase awareness among other stakeholders?

Not at this time.

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(50) Are any of the methods mentioned in the Green Paper, or any other technical means, applied at national level to limit access to on-line gambling services or to restrict payment services? Are you aware of any cross-border initiative(s) aimed at enforcing such methods? How do you assess their effectiveness in the field of on-line gambling?

I am aware of the dimming of websites done in Italy some years ago. If it is considered necessary to block access to unauthorized operators then this should be done for their "safe pages only" that is if one tries to login. Anything more is going to be content-censorship and goes beyond the scope of the law. The Greek national monopoly OPAP on the other hand are looking forward to apply to censorship to everything, including the daily sports news.

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(51) What are your views on the relative merits [in terms of suitability and efficiency] of the methods mentioned in the Green Paper as well as any other technical means to limit access to gambling services or payment services?

If some operators are considered unauthorized in a given country, then it is natural that access has to be restricted. But there should be no censorship applied and the mechanism should be only to prevent the logging in.

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Other comments on issues raised in section 2.4

There should be no content censorship.
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Other comments on issues raised in the Green Paper

This Green Paper should be about all those things exposed above but also about consumer rights and consumer protection. I have seen very little in that respect and therefore I make a follow-up report to try and expose those issues:

The starting point of the Green Paper should have been about pricing systems, and unfortunately it is n't.
The national monopolies wish to do away with all forms of fair gaming.
That is a) low prices in fixed odds betting (plus taxed applied) and b) hidden dividend percentages in mutuel betting.
This is diabolical.
The consumer of gambling products is not different to the consumer of any other product and is entitled to some respect.
After all we are always being taxed and there is no game of chance with 0% tax or bookmaker's percentage.
For many years it was considered that free entreprise should be allowed to self regulate itself. The consumer could choose the best price and place his money accordingly.
Now that this is being challenged we are unprotected and this Green paper does not even appear to cover the issue ! IMPOSSIBLE !!
No talk of fair payout system and how this should be accomplished !!!
Does the fact that we play with negative probabilities mean that we are also automatically stripped of all consumer rights and all the concepts of fair marketing go out of the window ?

All this talk is not certain to help the operators, national or private, even if they are to be allowed to operate with total disregard towards the consumer.
More likely than not the market will die, because we run out of money.
The dictatorial national operators and the private operators are not going to like this.

For many years we have been listening to their spokesmen saying things like "the public are imbeciles and will not understand what is happening to them". Also "the public have infinite money to give to us". That's how they talk and everyone knows it. They are about as friendly as AL QAIDDA in the videos they mail to Al Jazeera.
But they are being proved wrong and everywhere there is talk of recession and stagnation. Why ?
Because me, the more experienced bettor, and the others, the less experienced bettors, have the same kind of money in their pocket. Mine does n't last forever. Theirs does n't last forever.
So the monopoly supremos have got it wrong !.

There is a certain justification for all the noise.
The way internet market operates today, the gambling operators are not taxed in the clients countries (through a proportional scheme) but instead only in the country in which they are registered. This has got to be rectified somehow and there can be no question about it.
It should be therefore the task of the European commission to try and do the following:

- Protect the consumer against excessive practices.
- Propose a fair tax system for gambling activities without lowering prices.
- Propose methods to protect sports integrity from the effects of gambling without hurting the consumer.
- Propose methods to educate the public against gambling addiction.