

Gambling Industry Strategies to Influence the Reform of State Online Monopolies

The Case of the Gambling Industry in Sweden and Finland

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Résumé de l'article

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Gambling Industry Strategies to Influence the Reform of State Online Monopolies: The Case of the Gambling Industry in Sweden and Finland

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Abstract: The aim of this qualitative study was to investigate the strategies used by the gambling industry to influence the reforming of the state online monopoly into a licensing system in Sweden in 2019, and to weaken the state online monopoly in Finland. Methodologically, this study used primary data from 9 expert interviews in both countries and secondary data from prior literature, which were analyzed using thematic content analysis. The results identified five main political strategies used by the gambling industry: (1) *Information*, through lobbying politicians; (2) *Constituency Building*, through forming an alliance with interest groups; (3) *Policy Substitution*, through promoting alternative policies and self-regulation; (4) *Legal Infringements*; and (5) *Regulatory Redundancy*. The study concluded that the involvement of the gambling industry in policy-making influenced the change of the state online monopoly into a licensing system in Sweden in 2019 and is weakening the state online monopoly in Finland.

Keywords: Case study, gambling, monopoly, policy, Finland, Sweden

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Introduction

The harmful use of products with addiction potential, such as online gambling, has a serious effect on public health and well-being (Adams, 2013). Gambling is known to cause depression, violence in the family and society, and losses of economic resources (Hofmarcher et al., 2020). Globally, around 26% of the population gamble, representing about 1.6 billion people worldwide; while 4.2 billion people gamble at least once per year, among which 17% gamble online (Casino.org, n.d.). Gambling is an example of an unhealthy commodity industry (UCI), which are industries or groups of corporations with a significant share of their product portfolio comprising unhealthy commodities with high profit margins aimed at, and easily accessible to, large numbers of consumers (Stuckler et al., 2012).

The theme of this study was to analyze gambling industry (GI) strategies in two stable democratic countries—Sweden and Finland—where gambling has serious effects on public health (Hofmarcher et al., 2020; Marionneau et al., 2023). According to annual surveys in 2021 and 2022, 72% of people aged 16–87 in Sweden gambled in the last year (Fahlén & Hejdenberg, 2022). Problem gambling is a public health issue in Sweden that affects about 4% of the population (approximately 420,000 people), and an additional 130,000 people share a household with someone experiencing gambling problems (Hofmarcher et al., 2020; Public Health Agency of Sweden, 2024). Similarly, in Finland, a recent population survey found that about 78% of people aged 15–74 gamble (Grönroos et al., 2024). Problem gambling in Finland is a public health issue affecting approximately 3% of the

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population, or about 112,000 people (Salonen et al., 2020; Tammi et al., 2015).

The Nordic States of Denmark, Finland, Norway, and Sweden had established gambling monopolies on grounds that they help to prevent fraud and money laundering, and their proceeds could be channelled to their host societies. In the last decade, Denmark (in 2012) and Sweden (in 2019) ended their monopolies and opened their online markets to competition using a licensing model for international operators (Forsström & Örnberg, 2019). Meanwhile, Finland and Norway continue to operate the only fully monopolistic gambling regimes in Europe (Marionneau et al., 2021; Nikkinen & Marionneau, 2021), even though the GI has grown into a global business in the 21st century (Sulkunen et al., 2020).

In Finland, the gambling monopoly is heavily criticized because of its harmful practices and failure to protect consumers, among other things (Järvinen-Tassopoulos et al., 2021). There is evidence that the international gambling industry is somehow involved in a campaign against the online gambling (OG) monopoly in Finland (Örnberg & Tammi, 2011), and offshore gambling companies are increasingly operating in the Finnish market, which is also gradually eroding the state monopoly (Horner, 2022). There is also evidence that the GI in Sweden influenced the reform of the state online monopoly into a licensing system in 2019 because similar increases in OG had eroded Sweden's monopoly, allowing outside companies to operate easily in the Swedish market (Börjesson & Arvidsson, 2019; Horner, 2022). So far, there is fairly little evidence of the strategies that the GI might have used to influence the reform of state online monopolies in Sweden and Finland, but there is a fair amount of literature about the strategies the alcohol industry (AI) and the tobacco industry (TI) used to influence public policies in Finland (Hiilamo, 2003; Sama & Hiilamo, 2019). Studying the different regulatory trajectories in Sweden and Finland offers interesting avenues for comparison that might allow us to predict future reforms in Finland

and perhaps Norway, both of whom still operate fully monopolistic gambling regimes in Europe (Marionneau et al., 2021; Nikkinen & Marionneau, 2021).

Sweden was chosen as a comparative case study because, historically, it had the same state OG monopoly system as Finland before switching to a licensing system in 2019 (Binde, 2013; Matilainen, 2017; Örnberg & Tammi, 2011; Sama & Hiilamo, 2019; Sama et al., 2021). As of 2019, all gambling companies are required to obtain a license before they can legally operate in Sweden (McDonald et al., 2023). The [Swedish Gambling Authority](#) (Spelinspektionen) issues the licenses, and it is tasked with ensuring the legality, safety, and reliability of the Swedish gaming and gambling market. In contrast, in 2017, Finland merged its three state monopoly operators (with separate monopolies on lotteries, slot machines, casino games, horse and sports betting) into a single Finnish government-owned betting agency called Veikkaus (Selin et al., 2019). The aim of the centralized monopoly system in Finland is to better compete with operators from abroad and to prevent internal competition between the local operators. The two countries thus chose diametrically different paths when dealing with the new global digital gambling context (Tukia & Rydman, n.d.). During the time of data collection for this study, the GI in Finland was allegedly in the process of weakening the state's online monopoly (Horner, 2022). Finland is also preparing to adopt a licensing system by 2026, whose aim is to prevent and reduce economic, social, and health-related harms resulting from gambling, and to improve the channelling rate of the gambling system (Finnish Government, 2023, pp. 120–121). The channelling rate refers to the amount of gambling that takes place using services regulated by national legislation and supervised by the national authorities

This study answers two research questions: (1) What strategies were used by the gambling industry to influence the reforming of the state online monopoly into a licensing system in

Sweden in 2019? and (2) What strategies are being used by the gambling industry to weaken the state online monopoly in Finland?

Methods

Gambling policy formation can be analyzed from two opposing policy positions: (1) gambling revenue, or the economic benefits of gambling; and (2) the harmful impacts of gambling (Selin & Nyrhinen, 2022) (although other positions also exist). The first of these policy positions is held by those who focus on the beneficial aspects of gambling, such as the GI (who seek to exploit gambling markets), state monopolies (who consider gambling to be an important source of revenue for many social causes), and good-cause beneficiaries (who receive funding through gambling revenues for sports, culture, education, youth work, and other social and health activities). The second position is held by those who focus on the harmful aspects of gambling, such as experts in the social and health consequences of gambling, and the public-health actors who seek to prevent those consequences.

While acknowledging the role of other stakeholders, this study focuses on the role of the GI for three reasons: first, marketing by the GI is known to significantly influence gambling prevalence, while restrictions on gambling are a key element of gambling control (Guillou-Landreat et al., 2021). Second, the GI markets products that are harmful to people's health and well-being. Third, so far, there is fairly little evidence of the strategies that the GI might have used to influence the reform of state online monopolies in Sweden and Finland, though there is a fair amount of literature on the strategies used by the AI and the TI to influence public policies in Finland (Hiilamo, 2003; Sama & Hiilamo, 2019). We used the neo-pluralistic perspective in research on organized interests, which emphasizes the importance of contingency and context when studying how different types of interest groups behave (Lowery & Gray, 2004). Our approach was to study the ways in which the

GI intervened to influence the reforming of the state online monopoly into a licensing system in Sweden in 2019, and how the GI is currently influencing policy-making to weaken the state online monopoly in Finland. This approach is in the context of corporate political activity (CPA) (Bhuptani et al., 2022) undertaken by OG operators in their campaign to open monopolies for their commercial interests.

The qualitative data collected for this study were divided into primary and secondary data. Primary data were collected between March and September 2022 from interviews with experts who were knowledgeable in gambling policy-making in Sweden and Finland. There were nine groups of informants: researchers from universities and institutes, private research companies, industry interest groups, gambling monopoly operators, gambling licensing authorities, public health and well-being agencies / non-governmental organizations (NGOs), government ministries, consumer protection agencies, and law firms specializing in gambling. A total of eighteen interviews were conducted for this study, with nine informants from each country (see Table 1). Some interviewees were selected by snowball sampling (Naderifar et al., 2017), where research participants are asked to assist researchers by identifying other potential subjects to interview. Unfortunately, an equal representation of expert interviewees could not be found for all the groups of informants in Sweden and Finland, thereby creating an imbalance. The reason to interview different groups of experts, including Veikkaus, was to have multiple perspectives on the same interview question.

All the interviewees were contacted via email by the researcher requesting an interview. In the email, the interviewees were sent open-ended interview questions (see Appendices 1 and 2) so they could prepare their responses in advance. They were informed of the purpose of the study, the duration of the interview, how the data would be used, and that the results would be

anonymized as part of our research ethics process. All the interviews were conducted and recorded on Zoom due to COVID-19 pandemic restrictions. They were later transcribed using the *Grain* application (Grain Intelligence, n.d.). Secondary data were collected through a qualitative method from prior literature, journal articles, news articles, and websites using search terms like “gambling and monopoly” and “Sweden and Finland.” The paired search terms were entered into databases, such as EBSCOhost, PubMed, ProQuest, Scopus, Web of Knowledge, and Google Scholar, using their default search settings. Given the scarcity of peer-reviewed literature in the field, grey literature in English, Finnish, and Swedish (e.g., internet articles, blog posts, newspaper articles, and reports) were included in the secondary data. Data collected in other languages were translated into English.

In the context of case study design (Yin, 2014), the data for this study were analyzed qualitatively through a thematic content analysis (Hsieh & Shannon, 2005; Vaismoradi et al., 2013). We approached the interview data with a constructivist / interpretative approach, where we assumed that the informants, despite not being neutral actors, conveyed relevant and truthful information in their responses. Thematic content analysis was used to classify or code the data into a number of categories. In the framework of analysis, GI political activity was divided into *strategies* containing individual *tactics* (the methods by which a corporation attempts to exert influence), and *frames* containing individual *arguments* (the reasons given by a corporation as to why they oppose one idea or support another). The data were coded under the framework adopted by Sama and Hiilamo (2019) for the strategies used by the AI to influence the reform of the Finnish alcohol law; this framework was adapted from the five TI strategies developed by Savell et al. (2014). This framework was initially developed by Hillman and Hitt (1999) for corporate political strategy formulation. The coding categories (strategies and tactics) were

amended for our data analysis. In this study, “strategies” refer to the direction and scope of the GI’s CPA campaign to open up the Swedish and Finnish OG markets for their commercial interests, while “tactics” refer to the means by which a strategy is carried out. The inclusion criteria in the results were that each individual tactic and argument used by the GI to influence policy in Sweden and Finland had to be supported by verifiable evidence, such as a clear citation, direct quote from the interview data, or references from secondary data. Only tactics and arguments directly related to the influence of policy-making were included for analysis.

Results

We identified five main political strategies: (1) *Information*, under which the GI in Sweden directly lobbied politicians in the Swedish Parliament through Members of Parliament (MPs) of left-wing parties like the Social Democratic Party (SDP) (Socialdemokratiska arbetarepartiet); while in Finland, the GI indirectly lobbies politicians in the Finnish Parliament through MPs of right-wing parties like the National Coalition Party (NCP) (Kansallinen Kokoomus). (2) *Constituency Building*, under which the GI in Sweden formed an alliance with interest groups to lobby against the monopoly, though this was not the case in Finland. (3) *Policy Substitution*, under which the GI in Sweden and Finland promoted alternative policies and self-regulation. (4) *Legal Infringements*, under which the GI in Sweden used the legal system to argue that the monopoly was a violation of European Union (EU) laws, though this was not the case in Finland. (5) *Regulatory Redundancy*, under which the GI in Sweden and Finland argued that the monopoly was redundant (see Tables 2 and 3).

(1) Information

Our results indicate that, in Sweden, the first and most prominent tactic used by the GI was lobbying for their commercial interests. Respondents said the GI in Sweden lobbied

politicians through an alliance called the Swedish Trade Association for Online Gambling (Branschföreningen för Onlinespel, BOS), which is made-up of international gambling companies (IGCs) from Malta and Gibraltar like Mr Green, LeoVegas, and Kindred Group. Respondents said BOS and some smaller operators had direct contact with politicians in the Swedish Parliament through working-group meetings with MPs of left-wing parties like the governing SDP, which they used to influence the change from online monopoly to licensing system in 2019. The main arguments by the GI were that: (a) Sweden was no longer in a monopoly because over 50% of the online market was on unregulated sites owned by companies that were not paying taxes to the Swedish state; and (b) the lack of borders when it comes to OG made it difficult to keep the monopoly (Börjesson & Arvidsson, 2019). According to one respondent: *“More and more Swedes were gambling on unregulated sites, which made the monopoly worthless. This was over 50% of the online market”* (researcher). The GI also argued that, due to digitalization and globalization, the monopoly should be opened up because there was no other option.

In Finland, our results from the interview data also indicate that the first *Information* tactic is political lobbying, though it is not the most prominent tactic as it was in Sweden. Respondents suspected that big IGCs in the Finnish OG market (e.g., Betsson) hire lobbyists in public relations companies or use their representatives in Finland to indirectly lobby politicians (e.g., MPs of the right-wing NCP) who are in favour of liberalizing the gambling as well as the alcohol monopoly in Finland (Tigerstedt et al., 2020). This is also reflected in the NCP-led government program that, as of June 2023, advocates for the licensing of the OG monopoly in Finland (Finnish Government, 2023, pp. 120–121). Some left-wing MPs are also in favour of licensing the online monopoly because they think the monopoly has lost its competitiveness in the digital market (Koivula, 2023; YLE News, 2023).

The GI's main argument for changing the online monopoly to a licensing system like Sweden's is that Finland is no longer in a monopoly. Nearly 50% of the Finnish OG market is on unregulated sites owned by IGCs that do not pay taxes to the Finnish state, nor do they protect consumers from harm (Horner, 2022; YLE News, 2022). As in Sweden, the main argument is that it is difficult to keep a monopoly in this age of digitalization. A respondent spoke about an attempt to prevent OG through payment blocks:

I don't know if this is going to be effective because I think people who want to gamble online will still be able to do so on unregulated sites. This is the biggest problem for the legality of the Finnish monopoly system. (researcher)

A second tactic was economic benefit to the state. The GI in Sweden argued that a licensing system would be economically beneficial to the Swedish state because it would generate tax revenue from the OG companies in the Swedish market that were not paying taxes to the Swedish state nor protecting the consumers from harm. According to a respondent: *“The rise of online betting had gradually eroded the monopoly established in 1938, with other companies able to operate easily with online betting in the Swedish market without paying taxes to the state nor protecting the consumers from harm”* (public health actor). This was a logical argument because, in the first three quarters of 2018 for example, online operators without Swedish permits reported a gross gaming revenue (GGR) of SEK4.5 billion, without paying taxes nor protecting consumers (Granlund & Hamrén, 2018). According to a respondent, the government became aware of the loss in tax revenue and high problem-gambling rates on unregulated sites, and decided that the OG market would be opened up to competition by a licensing system (Nordic Welfare Center, 2017).

In Finland, the GI is also arguing that changing the monopoly to a licensing system will generate

tax revenue for the Finnish state from IGCs that are currently offering gambling services to Finns on unregulated sites (YLE News, 2023). According to a respondent: *"About half of the digital gambling market in Finland, valued at around €520 million during the first half of 2022, went to foreign operators who do not pay taxes to Finland"* (researcher) (see YLE News, 2022). Another respondent said: *"Overall, Finnish politicians are thinking about the possible increase in gambling revenue if the transition to a licensing system is made"* (researcher) (see Finnish Government, 2023, pp. 120–121).

A third tactic was the use of the media, both online social media and traditional media, to lobby the public and give the impression of greater support for the industry's position. Respondents said the GI in Sweden (e.g., Ladbrokes) used social media to lobby the public; for example, posting on Facebook, as Twitter was less influential in Sweden when the re-regulation of the Swedish gambling market began around 2006 (Binde & Romild, 2019; Börjesson & Arvidsson, 2019). Another respondent emphasized the role of traditional media by saying: *"The GI in Sweden was also active in traditional media like newspapers, and they had lots of advertisements, press releases, and articles in newspapers from 2008 when social media was not yet big in Sweden"* (gambling licensing authority). Though Swedish law forbade advertisements from unlicensed gambling companies, the law was largely ineffective because of legal technicalities and because Swedish authorities had no influence over the content of commercial television broadcasts from abroad. For example, in 2014, about three quarters of all gambling advertisements in Sweden were made by unlicensed companies (Binde & Romild, 2019). According to one respondent, the GI was also active in public debates involving right-wing politicians who were in favour of licensing OG because over 50% of the online market was on unregulated sites owned by companies that were not paying taxes to the

Swedish state: *"In the debates, the GI and some right-wing politicians wanted the unlicensed OG companies to be included in a licensed Swedish market so that they would be paying taxes to the Swedish state"* (public health actor).

The use of social media, particularly Twitter, to lobby the public and shape the news and public agenda is the most prominent tactic used by the GI to influence policy-making in Finland. Respondents suspected that the GI in Finland hires content creators, actors, athletes, influencers, and consultants to lobby the public through Twitter posts to give the impression of greater support for the industry's position that Finland should adopt a licensing system. It is common for IGCs to use their affiliates or influencers on social media to make their voices heard and for advertising (Lindeman et al., 2022). One respondent said:

The suspicion is due to the ways some of the influencers discuss on Twitter against the monopoly with contents that are organic, including posts, videos, stories, and hashtags like <#veikkauskraati> that are shared by their followers, or sponsored where the influencer is paid to increase the visibility of the organic content to target specific audiences. (researcher) (see Zelefsky, 2022)

Some influencers criticizing the monopoly have as many as 152,300 followers on Twitter. A respondent discussed the position of the critics of the monopoly by saying: *"The transition to a license system will increase the degree of channelling and will make the restrictions on gaming to be more effective than at present"* (researcher).

The last tactic was the use of commissioned or disseminated research reports and citations. For example, in 2012, BOS published a commissioned research report about the regulation of OG in Sweden. Their aim was to influence the regulation and taxation of the portion of the market accounted for by operators regulated with a

Swedish license (Trunkfield, 2012). By so doing, the GI in Sweden populated the evidence base with research that, among other things, would benefit their commercial interests when the OG monopoly changed to a licensing system.

The GI is also using disseminated research reports and citations to influence public opinion in Finland, mostly through social media, and specifically through Twitter. Examples of this use of research reports can also be found in online articles, such as Horner (2022):

The situation has escalated little by little. Veikkaus' sales and GGR have decreased every year of the company's operation. Veikkaus' GGR was around €1.8bn when the company started operations. According to this year's forecast, the GGR is about €1.0–€1.1bn. The drop has been in six years by about 40%[.] Veikkaus' market share of all gambling in Finland was at the 90% level, but now it is only about 2/3. Veikkaus has only 50% of gambling in digital channels, compared to 73% six years ago. The worst situation is in particularly competitive areas, in fixed-odds betting and online casino games, where Veikkaus' market share is only about a third. That has happened in a situation where Finland further tightened gambling legislation from the beginning of 2022 and made it more difficult for offshore companies to operate.

As a result, Finns have increasingly transferred their gambling to offshore companies where they are no longer under the supervision of the Finnish authorities (Horner, 2022). A spokesperson for the GI also argues that:

The situation cannot continue like this, and now it is better for everyone that the gambling system in Finland would change. That opinion was said by the CEO of Veikkaus in August when the company

reported its H1/2022 result. Veikkaus, therefore, announced that it no longer considers it reasonable to continue as a monopoly company, at least in competitive gambling areas. (Horner, 2022)

According to Koivula (2023), the current situation in Finland is in many ways analogous to neighbouring Sweden and Denmark, where the shift from OG monopolies to licensing systems began when the national monopoly operators Svenska Spel and ATG (Sweden) and Danske Spil (Denmark) began to advocate for a licensing system.

(2) Constituency Building

Constituency building has often been linked to indirect lobbying by unhealthy commodity industries (UCIs) like the TI and AI (Sama & Hiilamo, 2019; Savell et al., 2014; Savell et al., 2016). Our results indicate that the GI in Sweden used constituency building as a strategy to lobby for a licensing system in 2019 by forming the BOS alliance in 2012 (Swedish Trade Association for Online Gambling, n.d.). Through this alliance, the GI was able to build partnerships with left-wing parties like the governing SDP, through both individual politicians and the ministry responsible for gaming policy. These partnerships were then used to lobby against the online monopoly and to advocate for a licensing system (*Gambling Insider*, 2022). Alliances of UCIs influence policies by opposing public health measures and by making public opinion appear to be on the lobbyists' side (Savell et al., 2016). According to a respondent:

It was the big IGCs, such as Kindred and Betsson together with a couple of other smaller operators, that properly started to push for a licensing system in Sweden. They created the trade association BOS in order to hasten-up the process of re-regulation of the gambling market in Sweden. (lawyer)

In Finland, our results indicate that the GI does not have constituency building as it exists in Sweden because Finland has a full monopolistic gambling regime (Marionneau et al., 2021; Nikkinen & Marionneau, 2021). However, the Finnish Gambling Association (FGA) (Suomalainen Rahapeliyhdistys ry), which is an independent, non-profit organization aimed at bringing experts and stakeholders in the GI under one roof to share information and discuss the development of the existing gambling system in Finland, to reflect the requirement for high-level consumer protection, notes that:

The Finnish Gambling Association notes that the GI in Finland has been reformed numerous times without achieving the set objectives. The Finnish gambling system and legislation need immediate reform to clarify regulation, bring foreign operators within the scope of Finnish law, ensure responsible gaming, strengthen the state's tax base, and create new jobs in Finland.

The Finnish Gambling Association recommends that the new government program include a transition from the monopoly system for gambling to a blue and white combination model during the upcoming parliamentary term. In the license-based system, some gambling activities, such as sports and digital casino games, are opened to responsible, rule fulfilling, and tax-paying operators. The cornerstone of the new system should be responsibility and effective prevention of gambling-related harm, as well as channelling as much of the gaming as possible into the official regulated system. (Vähänen & Ripatti, 2023)

These recommendations align with MPs of the right-wing parties like the NCP and left-wing parties who are in favour of liberalizing the

gambling monopoly in Finland because they think the monopoly has lost its competitiveness in the digital market (YLE News, 2023). These recommendations are also reflected in the NCP-led government program that, as of June 2023, advocates for the licensing of the OG monopoly in Finland (Finnish Government, 2023, pp. 120–121). According to a respondent: “It is the IGCs with the biggest market share in the digital market in Finland, such as Betsson, that are advocating for change of the gambling monopoly into a licensing system” (researcher).

(3) Policy Substitution

Policy substitution is used as a strategy by UCIs to prevent the implementation of formal regulations and to promote alternative policies (Jernigan, 2012). Respondents said the GI in Sweden promoted alternative and self-regulation policies from a consumer protection perspective by advocating for a licensing system that would protect consumers, as one respondent expressed:

More and more gambling was online outside of the monopoly system and this posed a public health risk from a consumer protection point-of-view of the gamblers. Some gamblers were gambling and getting in debts outside of the monopoly system and so, with the licensing system, we would put some pressure on the licensed companies to protect the consumers, such as pushing one button to exclude yourself from all the gambling companies that have a license.”
(private research company).

Respondents said the GI in Sweden also advocated for fair competition in the licensing system because foreign companies should not be subject to regulations that are too strict; nor should they be asked to pay high tax rates, as this might discourage them from applying for a license (Nordic Welfare Center, 2017; O’Boyle, 2022).

In Finland, the GI also promotes alternative policies by arguing, according to one respondent, *"that a licensing system will be a win-win situation for Finland from the taxes that the licensed companies will pay to the Finnish state"* (researcher). The GI in Finland also promotes self-regulation policies by arguing *"that the monopoly should be licensed because online gambling is very difficult to regulate, or the way we need to regulate it will create other problems and other questions"* (researcher) (see YLE News, 2023). The GI also emphasizes responsible gambling and individual responsibility of the gamblers because they think gambling is an individual rather than a social issue (Marko et al., 2023). By so doing, the GI is attempting to shift the blame for gambling harm to individuals and away from society. The focus on individuals or a group of problem gamblers provides the industry with a frame that has the potential to invalidate the focus on harm prevention at a societal level (Gordon & Reith, 2019). This is also logical because, in Finland, the majority of gambling revenues are derived from people gambling on a weekly basis, from problem gamblers, and from gamblers of poor socioeconomic status. Lower-income earners also spend more on gambling than high-income earners in Finland. There have also been correlations between gambling levels and educational background, unemployment, poor health, and high use of intoxicants (Finnish Institute for Health and Welfare, 2023).

(4) Legal Infringements

In 2014, the EU Commission sued Sweden for failing to change its rules for online betting and poker games (Fioretti, 2014). Sweden was said to have violated EU laws on the free movement of goods and services because Swedish authorities did not adequately supervise the commercial activities of the exclusive monopoly operator, Svenska Spel. According to a respondent, *"Sweden was referred to the EU Court of Justice for imposing restrictions and promoting online betting services in a way which was inconsistent with EU*

law" (industry interest group). These arguments questioning the legality of the monopoly shifted the focus of the debate away from public health and consumer protection measures to the commercial interests of the GI.

In Finland, no cases of *Legal Infringement* arguments were given against the monopoly; although, in 2006, the EU Commission initiated infringement proceedings against Finland and several Member States regarding restrictions on remote sports betting (European Commission, 2006). These proceedings were closed in 2013 alongside an announcement from the Commission that it would not take further measures to challenge the Finnish State monopoly (Marionneau & Hellman, 2020).

(5) Regulatory Redundancy

The GI in Sweden argued that the state gambling monopoly was unfair and redundant because, as one respondent expressed:

while Svenska Spel has made significant changes, some people think it still holds an unfair position. Some think the government should not own a business in a sector it also regulates. A state should set the rules for commercial gambling companies and make sure the companies comply with the rules, rather than be an active player in the market itself. (lawyer) (see O'Boyle, 2022)

In Finland, the GI also uses redundancy arguments on social media, as expressed by a respondent:

monopolies generally are not a good way of mitigating health dangers or other problems because they have become historical remnants. Veikkaus's monopoly has been rooted in the idea of regulation, but as most games today happen online, people in Finland are playing games run by foreign operators that are not paying taxes to the Finnish state nor protecting

the consumers from harm. (researcher)
(see Schmitz & Fettig, 2020)

Discussion

The aim of this study was to identify the strategies used by the GI to influence Sweden's reform of its state online gambling monopoly into a licensing system in 2019, and to weaken the current monopoly in Finland. The results confirm Savell et al.'s (2014) work on the TI and Sama and Hiilamo's (2019) work on the AI; which is to say that gaining access to political decision makers with the same ideological convictions was an important GI strategy for influencing policy-making in both Sweden and Finland. As of June 2023, the NCP-led government program in Finland also advocates for a licensing of the OG monopoly to prevent and reduce economic, social, and health-related harm resulting from gambling and to improve the channelling rate of the gambling system (Finnish Government, 2023, pp. 120–121). We found no evidence of donations to politicians who supported the commercial interests' approach of the GI in either Sweden or Finland. Previous studies indicate that UCIs like the AI and the TI forged direct or indirect partnerships with government agencies to share information because, in addition to political interests, they shared common business interests (Hoe et al., 2022). Such partnerships advance the commercial interests of UCIs rather than public health interests because UCIs merely promote policies that fail to reduce harms, such as those caused by gambling (Wardle et al., 2019). The results indicate that the GI in Sweden and Finland influenced policy-making using *Information* tactics like "economic benefit to the state" and "commissioned or disseminated research reports and citations." We found no evidence of misinformation or disinformation in the referenced reports in both countries, though the studies were commissioned by BOS in Sweden and Veikkaus in Finland (Horner, 2022; Trunkfield, 2012).

The use of social media, specifically Twitter, emerged in this study as an important *Information* tactic for influencing policy-making by the GI in Finland. In Sweden, however, Facebook and traditional media (e.g., commercial television advertisements, press releases, and articles in newspapers) were more prominent because other types of social media (e.g., Twitter) were not yet popular when the re-regulation of the gambling market began in 2006 (Börjesson & Arvidsson, 2019).

Our results also indicate that constituency building was used as a strategy by the GI to influence policy-making in Sweden, though this was not the case in Finland. A previous study in Finland (Sama & Hiilamo, 2019) found that the AI successfully used both information and constituency building to influence the reform of the Finnish alcohol law from restrictions to liberalization.

Our results indicate that the GI in Sweden successfully engaged in CPA to influence policy-making by lobbying, shaping the evidence base, and promoting self-regulatory policies favourable to their commercial interests. As of June 2023 in Finland, the NCP-led government program has adopted some of the GI's arguments to license the online monopoly by 2026 (Finnish Government, 2023, pp. 120–121). The gambling policies in Sweden, Finland, and other Nordic countries are often presented as unique because of their strong emphasis on public-health protection and because of the exceptional role of the state in the regulation of gambling (e.g., Finland and Norway, which still have full state monopolies over their gambling industries) (Örnberg, 2006). Globally, the GI's involvement in policy-making is not new, and there has been a recent increase in the industry's efforts to be seen as a key partner in policy-making (Sulkunen et al., 2020).

Our results add to the evidence of CPA by the GI and demonstrate a great similarity in the tactics used to influence policy-making in Sweden and Finland, though some disparities also exist. The

main similarity is that OG in Sweden was increasingly occurring on unregulated sites owned by foreign companies that did not pay taxes to the state and did not protect consumers from harm. This influenced Sweden's decision to change their gambling system from a state online monopoly to a licensing system (Börjesson & Arvidsson, 2019). A very similar situation is currently happening in Finland (Horner, 2022). In contrast:

1. the GI in Sweden had direct contact with politicians, while in Finland it is indirect;
2. the use of social media, specifically Twitter, is more prominent in influencing policy-making in Finland than it was in Sweden (Börjesson & Arvidsson, 2019);
3. the GI in Finland was not found to be active in traditional media, whereas in Sweden the GI used advertisements, debates, and articles in newspapers; and
4. constituency building and legal infringements were used in Sweden, though these were not the case in Finland.

Our results also shed light on two additional GI strategies: legal infringements and regulatory redundancy, which were developed by Savell et al. (2014) but were not relevant to Sama and Hiilamo's (2019) framework.

Overall, our results indicate that the GI has used strategies that are similar to those used by the AI to influence policy-making for their commercial interests (Sama and Hiilamo, 2019). We conclude that the involvement of the GI in policy-making influenced the change of the state online monopoly to a licensing system in Sweden in 2019. In Finland, the involvement of the GI in policy-making is also weakening the state online gambling monopoly to the point where the NCP-led government has decided to replace it with a licensing system by 2026 (Finnish Government, 2023, pp. 120–121).

Strengths and Limitations

The main strength of this study is that it provides a broad overview of the tactics and

arguments used by the GI to influence policy-making against the state online monopoly in Sweden and Finland. The study's attempt to categorize the industry's strategies, tactics, and arguments suggests that the findings may be applicable to other UCIs (e.g., the alcohol and tobacco industries). Since this study discusses CPA undertaken by the GI in their campaign to open up the Swedish and Finnish online markets, another strength of this study is that it represents a contribution to the literature of CPA by the GI and perhaps that of the Commercial Determinants of Health (CDoH) (de Lacy-Vawdon & Livingstone, 2020; Hancock et al., 2018).

However, this study also has a number of limitations: First, we were unable to find an equal representation of expert interviewees for the nine groups of informants in Sweden and Finland, which created an imbalance. Second, the secondary data used in this study for the two non-English speaking countries of Sweden and Finland were mostly in English language. But all the material in Swedish, Finnish, and other languages were translated into English language, which may have somewhat limited the extent of our analysis. Third, we did not have access to internal GI documents that might have shed light on the strategies identified in this study or any other strategies, including directly or indirectly targeting political decision makers. Fourth, the identification of the tactics and arguments and the jurisdictions in which they are used in this study depend on interviews and secondary data. Closely related to this is the fact that the results focused mainly on the commercial interests of the GI in Sweden and Finland, whereas the GI may use a more diverse set of tactics and arguments in other policy-making areas. Finally, despite triangulating our interview data with secondary data, we were not able to check the validity of all the statements of our informants.

Implications for Policy, Practice, and Research

This study has identified five main strategies used by the GI to influence policy-making in

Sweden and Finland. This study may be useful to policy-makers who wish to understand how the GI influences policy-making. The strategies identified in this study might be useful to policy-makers and public-health actors in Sweden, Finland, and elsewhere who are attempting to counter efforts to influence policy-making by the GI. This study has further developed the framework for classifying the CPAs that were outlined by Savell et al. (2014) for the TI and adapted by Sama and Hiilamo (2019) for the AI. We have shown the policy and scholarly value of applying these frameworks to other UCIs, like the GI. Future research could investigate the role of social media in influencing gambling regulation in Finland. Future research could also investigate responsible gambling measures implemented in Sweden since the transition to a gambling licensing system, with a view to identifying best practices for Finland, which is planning to make a similar shift by 2026.

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project where my co-author was the supervisor and did not receive any funding. However, this paper is based on research that is distinct and independent from the previous one. The authors have no competing interests to declare for this study.

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Tables

Table 1. Distribution of interviewees by expertise in Sweden and Finland.

Level of expertise	Sweden / Number interviewed (9)	Finland / Number interviewed (9)
Researchers from universities and institutes	- Stockholm University / 2 - Karolinska Institute / 2	- Helsinki University / 2 - Finnish Institute for Health and Welfare / 3
Private research companies	- Sustainable Interaction Sweden / 1	
Industry interest groups	- Swedish Trade Association for Online Gambling (Branschföreningen för Onlinespel, BOS) / 1	
Gambling monopoly operators		- Finnish government-owned betting agency (Veikkaus) / 1
Gambling licensing authorities	- Swedish Gambling Authority (Spelinspektionen) / 1	
Public health and well-being agencies / non-governmental organizations (NGOs)	- Swedish Public Health Agency (Folkhälsomyndigheten) / 1	- Finnish Association for Substance Abuse Prevention (Ehkäisevä päihdetyö) / 1
Government ministries		- Finnish Ministry of Social Affairs and Health (Sosiaali- ja terveystieteiden ministeriö) / 1
Consumer protection agencies		- Finnish Competition and Consumer Authority (Kilpailu- ja kuluttajavirasto) / 1
Law firms specializing in gambling	- Nordic Gambling / 1	

Table 2. Distribution of influence by experts to change the state online gambling monopoly in Sweden to a licensing system in 2019 and to weaken the state online gambling monopoly in Finland.

Level of governance	Sweden	Finland	European Union (EU)
Parliamentary groups against the state online gambling monopolies	<p>The left-wing parties:</p> <ul style="list-style-type: none"> - Social Democratic Party (SDP) (Socialdemokratiska arbetarepartiet) - Centre Party (CP) (Centerpartiet) - Moderate Party (MP) (Moderata samlingspartiet) - Christian Democrats (CD) (Kristdemokraterna) - Green Party (GP) (Miljöpartiet de gröna) - Liberal Party (LP) (Liberalerna) 	<p>The right-wing parties; for example:</p> <ul style="list-style-type: none"> - National Coalition Party (NCP) (Kansallinen Kokoomus) 	<ul style="list-style-type: none"> - European Commission (EU Law)
Trade associations, and lobby and interest groups against the state online gambling monopolies	<p>Swedish Trade Association for Online Gambling (Branschföreningen för Onlinespel, BOS):</p> <ul style="list-style-type: none"> - Kindred Group - Mr Green - LeoVegas 	<p>Finnish Gambling Association (FGA) (Suomalainen Rahapeliyhdistys ry):</p> <ul style="list-style-type: none"> - Betsson - ComeOn Group - LeoVegas - Kindred Group - William Hill - Entain - Flutter Entertainment 	<p>International gambling companies in Malta and Gibraltar; for example:</p> <ul style="list-style-type: none"> - LeoVegas - ComeOn Group

Table 3. Strategies and tactics used by the gambling industry to influence the change from the state online monopoly in Sweden to a licensing system in 2019 and to weaken the state online monopoly in Finland.

Strategy	Tactics (Sweden)	Tactics (Finland)
Information	<ul style="list-style-type: none"> - Direct lobbying of Members of Parliament from left-wing parties (e.g., SDP) - Economic benefit for the state (e.g., generate tax revenue) - Media (social and traditional media) - Commissioned or disseminated research reports (shaping the evidence base) 	<ul style="list-style-type: none"> - Indirect lobbying of Members of Parliament from right-wing parties (e.g., NCP) - Economic benefit for the state (e.g., generate tax revenue) - Media (social media)
Constituency Building	<p>Forming an alliance with interest groups in the GI (Swedish Trade Association for Online Gambling / Branschföreningen för Onlinespel, BOS):</p> <ul style="list-style-type: none"> - Kindred Group - Mr Green - LeoVegas 	<p>Forming an alliance with interest groups in the GI (Finnish Gambling Association, FGA / Suomalainen Rahapeliyhdistys ry):</p> <ul style="list-style-type: none"> - Betsson - ComeOn Group - LeoVegas - Kindred Group - William Hill - Entain - Flutter Entertainment
Policy substitution	<ul style="list-style-type: none"> - Promoting alternative policies - Promoting self-regulation 	<ul style="list-style-type: none"> - Promoting alternative policies - Promoting self-regulation
Legal infringements	<ul style="list-style-type: none"> - Using European Commission (EU Law) (e.g., regulation is discriminatory) 	N/A
Regulatory redundancy	<ul style="list-style-type: none"> - The monopoly was redundant 	<ul style="list-style-type: none"> - The monopoly is redundant

Appendices

Appendix 1. Interview questions in Sweden

- 1) Why was the state online gambling monopoly in Sweden changed into a licensing system in 2019?
- 2) When did discussions to change the online gambling monopoly in Sweden begin?
- 3) Who were the actors who began the discussions to change the online gambling monopoly in Sweden and why?
- 4) Which kinds of arguments were used by the actors who wanted change of the online gambling monopoly in Sweden?
- 5) What kind of change did the actors who wanted change of the online gambling monopoly in Sweden propose?
- 6) Was there some pressure from international gambling companies to change the online gambling monopoly in Sweden into a licensing system and which were the international gambling companies?
- 7) What is your opinion on the current licensing system of the gambling industry in Sweden compared to the state monopoly system which existed before 2019?
- 8) Do you think social media played an important role in the change of the online gambling monopoly in Sweden into the current licensing system and how?
- 9) Who were the actors discussing on social media to change the gambling monopoly in Sweden?
- 10) Which kinds of arguments were used on social media to change the gambling monopoly in Sweden to a licensing system in 2019?
- 11) When was the bill to change the gambling monopoly in Sweden to a licensing system tabled in the Parliament and by who?
- 12) When the bill to change the gambling monopoly in Sweden was tabled in the Parliament, which parties supported the licensing of the monopoly and why?
- 13) When the bill to change the gambling monopoly in Sweden was tabled in the Parliament, which parties opposed the licensing of the monopoly and why?
- 14) What has changed since the online gambling monopoly in Sweden was changed into a licensing system in 2019?
- 15) Can you give me some contacts of gambling researchers or experts in Sweden?
- 16) What is your final word?

Appendix 2. Interview questions in Finland

- 1) What is your opinion on the current gambling monopoly in Finland when a neighbouring EU country like Sweden has changed her gambling monopoly into a licensing system and since Finland is one of the EU countries that has maintained a gambling monopoly under Veikkaus?
- 2) Why is the gambling monopoly in Finland heavily criticized on social media by actors who want change (such as on Twitter with hashtag #veikkauskratia)?
- 3) What role do you think Veikkaus is playing to reform the gambling monopoly in Finland due to external pressure or criticisms of the monopoly such as on social media?
- 4) How has the social media criticisms of the gambling monopoly in Finland affected Veikkaus?
- 5) What is Veikkaus's reaction to the social media criticisms against the monopoly in Finland?
- 6) Who are the main actors on social media such as gambling companies advocating for a change in the gambling monopoly in Finland?
- 7) What are the arguments by the actors advocating for change in the gambling monopoly in Finland on social media?
- 8) Is there some pressure from international gambling companies to change the gambling monopoly in Finland and how?
- 9) Which are the international gambling companies advocating for a change in the gambling monopoly in Finland?
- 10) Where do you see the future of the gambling monopoly in Finland?
- 11) Which political parties in Finland are in favour of changing the gambling monopoly in Finland and why?
- 12) Which political parties in Finland oppose changing the gambling monopoly and why?
- 13) What will change if the gambling monopoly in Finland is changed?
- 14) Can you give me some contacts of gambling researchers or experts in Finland?
- 15) What is your final word?