

Report on Illegal Gambling 2024

One of the Danish Gambling Authority's supervisory tasks is to monitor the illegal gambling market in Denmark.

This ensures player protection and a well-regulated market for those who are licensed to offer gambling in Denmark.

This report describes the Danish Gambling Authority's work with illegal gambling in 2024.

Table of contents

Introduction	2
Summary	3
1. What is illegal gambling?	4
1.1 When is a gambling licence required?	5
1.2 When is a gambling offer illegal?	5
1.3 When is gambling offered in Denmark?.....	5
1.4 Communicating access to participation in and advertising of gambling without a licence	5
1.5 The Danish Gambling Authority's sanction options	6
2. The Danish Gambling Authority's work with illegal gambling in 2024	7
2.1 Searching for potentially illegal websites	8
2.2 The effect of blockings	8
2.3 New trends - Betting with Robux.....	8
2.4 Collaborations with Google, Facebook, Apple and now Twitch	9
2.5 International collaboration	10
2.6 StyrPåSpillet ("Know and control the game").....	10
2.7 Presentations at upper secondary schools.....	11
2.8 Young people know the Danish Gambling Authority's label.....	11
3. Illegal land-based gambling	12
3.1 Illegally installed gaming machines and betting terminals.....	13
3.2 Poker games without a licence.....	13
4. Appendix	14
4.1 Appendix 1: Overview of the number of requests and blockings since 2012.....	15
4.2 Appendix 2: Published statistics from H2 Gambling Capital	16

Introduction

One of the Danish Gambling Authority's supervisory tasks is to monitor the illegal gambling market in Denmark and thereby protect players and ensure a well-regulated market for those who are licensed to offer gambling in Denmark.

Once a year, the Danish Gambling Authority publishes a report on its work to prevent illegal gambling. The focus is especially on online gambling operators that target their gambling offers to Denmark and do not have a Danish licence. In addition, the Danish Gambling Authority also has a strong focus on websites and people who communicate access to and advertise illegal gambling.

The first few sections of the report briefly explain the rules in this field. This is important to have in place before focusing on the tasks performed by the Danish Gambling Authority in relation to illegal gambling in 2024.

Summary

Over the past 13 years, the Danish Gambling Authority has continuously searched websites and processed reports from citizens and others regarding the provision and communication of gambling operators without a licence.

The Danish Gambling Authority's work in 2024 with illegal gambling sites resulted in 162 websites being ruled illegal by the district court. In our opinion, the increase in the number of searched and blocked websites (Appendix 1) is an expression of the Danish Gambling Authority's increasing focus on illegal gambling and not necessarily a growth of the illegal gambling market in Denmark.

This is supported by figures published by H2 Gambling Capital (see Appendix 2). The figures confirm that that Denmark has a high channelisation rate.

The channelisation rate refers to the proportion of online gambling spending that comes from gambling operators that are licensed to offer gambling products and services in the country in question. The channelisation rate thus shows how much of the online gambling spending takes place on websites that must follow the country's rules for offering gambling.

The Danish Gambling Authority works with other forms of illegal gambling such as skin betting, the lines between gambling and video games, and educational work on illegal gambling.

The Danish Gambling Authority has close international collaborations, including with other foreign gambling authorities and international companies, where the collaboration between them strengthens the efforts against illegal gambling.

What is illegal gambling?

1

1.1 When is a gambling licence required?

The Danish Gambling Authority monitors the Danish gambling market to ensure that gambling is not offered in violation of the Danish Gambling Act. Providing gambling in Denmark requires a licence if:

- Participation requires a stake (of money or anything of financial value),
- The participant has a chance of winning through the stake (any kind of winnings of financial value) and
- The chance of winning depends on an element of chance.

1.2 When is a gambling offer illegal?

A game is offered in violation of the Gambling Act if:

- The gambling product is offered without a licence from the Danish Gambling Authority, and
- The gambling operator focuses its range of games on the Danish market.

1.3 When is gambling offered in Denmark?

An online gambling offer may be aimed at Denmark if one or more of the following elements are present on the website¹:

- Danish language
- Danish currency
- Payment solutions that only work in Denmark (e.g. Dankort)
- Danish customer service
- The video game platform Steam is used to communicate access to the website
- The website has pre-filled Denmark, Danish, +45 etc. in the registration process
- Gambling offers that in their composition are aimed directly at the Danish market
- The website redirects to websites that offer gambling illegally

Likewise, the gambling product may be aimed at the Danish market, even if none of the above conditions are met, if it is marketed directly to Danish players.

In relation to skin betting, the court ruled on February 6, 2018, that websites that use the computer game platform Steam as login are considered to be aimed at Denmark. The decision can be read on the Danish Gambling Authority's website here: [Decision of February 6, 2018](#).

1.4 Communicating access to participation in and advertising of gambling without a licence

It is a violation of the Gambling Act to communicate participation in, and advertise, gambling without a licence. The assessment includes, among other things, whether the communication or advertising is aimed at the Danish market.

The provision of gambling without a licence means all activities aimed at establishing gambling or spreading participation in illegal gambling, whether offered electronically or otherwise. For example, links to websites of gambling operators that offer gambling in Denmark without a licence in violation of the Danish Gambling Act.

¹ The Danish Gambling Authority's definition of when a gambling offer is aimed at Denmark is based on the Danish Minister of Taxation's response to the telecommunications industry in connection with the preparation of the Gambling Act, which came into force in 2012

Advertising gambling without a licence means receiving sponsorship from illegal gambling operators. Sponsorships *typically* mean that a gambling operator makes a financial contribution to a recipient, whereupon the recipient is typically expected to give something in return in the form of advertising, positive publicity and the like. Often the illegal gambling operator will also use the name of the recipient of the sponsorship in their own marketing.

1.5 The Danish Gambling Authority's sanction options

When the Danish Gambling Authority becomes aware of a website that offers illegal gambling or illegally communicates access to or advertises illegal gambling, we contact the owners of the website where possible. Here we draw attention to the violation and request that the illegal gambling offer is stopped or the illegal communication or advertising.

In several cases, the dialog based on this request is sufficient to stop the violation.

In cases where an illegal gambling offer is not stopped, we do not hear from the owners, or we cannot locate the owners, we have the option to have the website blocked by the Danish internet service providers via the district court.

In addition, we have the option to report the website owners to the police, after which the responsibility for the further process is transferred to the police. We also have the option to order that the illegal matter is rectified or ceases.

The Danish Gambling Authority's work with il- legal gambling in 2024

2

2.1 Searching for potentially illegal websites

In 2024, the Danish Gambling Authority, in collaboration with the Danish Tax Agency's anti-fraud unit, conducted three searches of potentially illegal websites. The Danish Gambling Authority's market analysis team also conducts searches for potentially illegal websites, among other things by following and analysing the development of Danes' gambling on websites without a licence. This is done by using web traffic data from Semrush². The Danish Gambling Authority also receives inquiries about potentially illegal websites from citizens.

Supervision of the potentially illegal websites has resulted in the Danish Gambling Authority blocking 162 websites with an illegal gambling offer in 2024.

The blocking case in 2024 was decided on a written basis in court, making the whole process faster and more efficient. The Danish Gambling Authority took two blocking cases to court in 2024, which is twice as many as previously.

See an overview of the number of searches, requests and blockings over the years in Appendix 1.

2.2 The effect of blockings

The Danish Gambling Authority monitors the effect of DNS blocking of illegal websites by, among other things, analysing web traffic data. It is difficult to measure the impact of DNS blockings on websites that were blocked in 2024, as they weren't blocked throughout 2024. The study therefore measured the blocking of 49 pages that were blocked in 2023. Data shows that the total number of Danish visits to these sites has decreased after the blockings. The blockings show a decrease of approximately 44% from 2023 to 2024.³

The figures indicate that DNS blocking has had an effect on reducing Danish traffic to illegal gambling sites also in 2023. This emphasizes that DNS blocking remains an effective tool in the fight against illegal gambling operators.

2.3 New trends - Betting with Robux

Part of the Danish Gambling Authority's supervision of the illegal gambling market also concerns skin betting, where deposits and/or winnings constitute a skin from computer games. In recent years, a phenomenon has emerged in skin betting called "Robux betting" or "Roblox Gambling", which is known from the computer game Roblox. This particular type of game is made by using the virtual currency from the Roblox platform, Robux, as a deposit.

Robux can not only be used on the Roblox gaming platform but can represent an independent economic value outside of Roblox.

The Roblox platform divides Robux into different categories. Including the category "earned Robux", which covers the Robux that Roblox players have earned on commission from selling developed games and associated skins etc. to other users on the Roblox platform. A special feature of "earned Robux" is that they can be traded and paid out in US dollars or Danish kroner directly through DevEx (Roblox Developer Exchange Program).

This is used by several third-party websites where you can use Robux as deposits and winnings in betting, casino games and lotteries.

² Semrush is a company specialized in search engine optimization and online visibility.

³ The accuracy of the data from Semrush can vary from website to website. Although the total number of visits to the sites has decreased, it should be noted that there are a few websites where there has been no decrease in visits over the period.

The computer game Roblox is particularly popular among children and young people under the age of 18. Therefore, Robux betting can be a problem because it also means that many young people under the age of 18 can access gambling via Robux betting.

On almost all illegal Robux betting websites, the Roblox login can be used for access. This is problematic as the Roblox login is associated with the legal gaming platform and communicates easier access for young people in particular to participate in gambling.

In a ruling dated August 22, 2024, the Danish Gambling Authority was upheld by the Court of Frederiksberg that websites offering Roblox logins, which are partially written in Danish including customer support, to provide access to the gambling site, are considered to be aimed at the Danish market.

Robux betting is thus covered by the Danish Gambling Act's rules for betting and casino, and to offer it in Denmark, a licence from the Danish Gambling Authority is required to offer betting and/or online casino. As there is a monopoly on lotteries, it will not be possible to get a licence to offer Robux lotteries. There are no operators licensed for any form of skin betting yet.

2.4 Collaborations with Google, Facebook, Apple and now Twitch

The Danish Gambling Authority fights illegal gambling and the illegal provision of gambling on many fronts. As part of the Danish Gambling Authority's supervision, we have observed that illegal gambling is offered through apps on App Store and that access to and advertising of these apps is provided on Facebook and Google.

Through the Danish Gambling Authority's collaboration with Apple, the Danish Gambling Authority has special access to report illegal gambling in apps on Apple's App Store. Apple can then remove the app from the Danish App Store if there is illegal gambling content.

In last year's report, we told you that the Danish Gambling Authority had established a collaboration with Google, where the Danish Gambling Authority has also gained access to report illegal gambling in apps on Google Play to Google, which can then remove the illegal content.

In addition, the partnership with Google provides direct access to report illegal gaming content on YouTube and sponsored links on the Google search engine.

Through our partnership with Facebook, we have access to report illegal communication and advertising of illegal gambling content, which can then be removed from their platforms on Facebook and Instagram.

In 2024, the Danish Gambling Authority has also partnered with the streaming platform Twitch, where the Danish Gambling Authority has observed streaming of illegal communication and advertising of illegal gambling content. Through the collaboration with Twitch, we also have access to report illegal gambling offers as well as illegal communication and advertising of illegal gambling content, which can then be removed from the platform.

Before illegal gambling content is removed from any of the above media, the Danish Gambling Authority has contributed with evidence, reference to legal basis and our assessment of the illegal content so that Facebook, Google, Apple and Twitch can remove the content on an informed and documented basis.

The Danish Gambling Authority is working to establish more collaborations with other media,

where we see illegal gambling or the illegal provision of gambling taking place. If you want to help the Danish Gambling Authority in our supervision, we encourage you to document the gambling offer with pictures or video and links to any websites, Facebook groups, apps, etc.

2.5 International collaboration

The Danish Gambling Authority is committed to collaborating with our colleagues abroad. Among other things, we are part of an international working group "Enforcement Working Group" in GREF (Gaming Regulators European Forum)⁴. The group works on how we can best help each other fight illegal gambling and keep each other updated on what trends are seen across the illegal gambling market in Europe to help combat it. Read more in the declaration here: [GREF Declaration of gambling regulators on their concerns regarding illegal operators - Gref](#).

The Danish Gambling Authority is also part of IAGR (International Association of Gaming Regulators)⁵, which is a forum where gambling regulators from all over the world can meet to exchange knowledge and strategies and discuss current issues and working procedures. IAGR counts approximately 75 jurisdictions around the world.

The Danish Gambling Authority also participates in an annual Nordic case manager meeting. In 2024, the focus has been on the fight against illegal gambling and the trends in the illegal gambling market in the Nordic countries.

Maintaining international cooperation and focus on illegal gambling is essential as online gambling operators provide gambling across borders.

2.6 StyrPåSpillet ("Know and control the game")

The Danish Gambling Authority runs the knowledge platform StyrPåSpillet.dk (styrpaaspillet.dk).

StyrPåSpillet has a special focus on children and young people's relationship with gambling and is targeted at parents and professionals (e.g. educators), but the platform is useful for anyone looking for general knowledge about or specific tools for dealing with gambling.

The website contains all relevant information about gambling and compulsive gambling, including articles, studies, educational material and the podcast "We talk about gambling". Much of the material is about gambling addiction; what it is, how it develops and what tools are available to prevent and treat it.

There are also articles explaining when gambling is illegal in Denmark and what consumer protection elements must be in place for operators licensed by the Danish Gambling Authority. In the platform's gaming/gambling dictionary, users can read about definitions of "grey" and "black" gambling websites.

StyrPåSpillet contributes both to general information about gambling, but also to specific information about when gambling is offered illegally.

⁴ GREF is an association of gambling regulators in Europe

⁵ IAGR is a global organization for gambling regulators.

2.7 Presentations at upper secondary schools

For several years, the Danish Gambling Authority has offered to give presentations at upper secondary schools about illegal gambling and the differences between gaming and gambling. One of the aims of the presentations has been to increase students' awareness of the Danish Gambling Authority's label and thus increase understanding of the difference between the regulated and unregulated market.

From 2022 onwards, we have increased our efforts to reach a broader audience with the presentations (primarily targeting upper secondary schools) and the response has been very positive. As the demand for these presentations has increased significantly, the Danish Gambling Authority held a total of 98 class presentations across the country in 2024. There was also a presentation for the police in the Central and West Jutland police district in relation to the district's work with preventing crime in a collaboration between schools, social services and the police.

The presentations in upper secondary schools meet students on their terms. We have very deliberately avoided bans and scare tactics, and the response from both students and teachers has been very positive as the presentations are perceived as balanced.

Participants are highly involved in the presentations, which use both visual and physical elements. For example, a portable roulette table helps to highlight facts such as RTP (return to player) and probability of winning.

The presentations cover the following topics, among others:

- Definitions of games/gambling
- Motivations to gamble
- Variance and probability
- RTP (return to player)
- Loss of control
- The Danish Gambling Authority's label

With the many positive lessons learned from these presentations so far, this effort will continue in 2025. It's worth noting that some schools from 2024 have already re-booked the presentations for 2025.

2.8 Young people know the Danish Gambling Authority's label

In connection with a campaign for the Danish Gambling Authority's label, the Danish Gambling Authority conducted interviews with young men aged 18-23 in 2024 to investigate their knowledge of the label.

The survey showed that young people are very aware of the label. They say that they look for the label on gambling websites to make sure that the operator has a Danish licence. "I don't bother gambling on [sites without a Danish licence], I don't feel that there is the same security. I want to make sure I can get my money out," says one of the interviewees.

It is positive that young people are aware of the label, and the Danish Gambling Authority puts a lot of effort into raising awareness of the label so that players know when they are gambling on websites that are licensed to offer gambling in Denmark.

In spring 2025, the campaign "Are you playing it cool?" will be present on social media and outdoors in several Danish cities.

Illegal land-based gambling

3

3.1 Illegally installed gaming machines and betting terminals

If the Danish Gambling Authority becomes aware of possible illegal installation and operation of gaming machines or betting terminals, we report this to the police. We always assist the police if they request it.

In 2024, the Danish Gambling Authority was involved in cases concerning 14 gambling establishments where gaming machines and/or betting terminals were installed without a licence.

3.2 Poker games without a licence

Poker can be played as a public game of chance in tournament form (also known as public poker tournaments) according to the rules in the Poker Act. The Danish Gambling Authority licenses and supervises the conduct of public poker tournaments.

If poker games are played without a licence for not insignificant financial gains, it is not a violation of the Poker Act or the Gambling Act, but of sections 203 and 204 of the Criminal Code. Therefore, it is not the Danish Gambling Authority, but the police who have the authority to inspect unlicensed gambling establishments. The Danish Gambling Authority can offer to assist with an inspection.

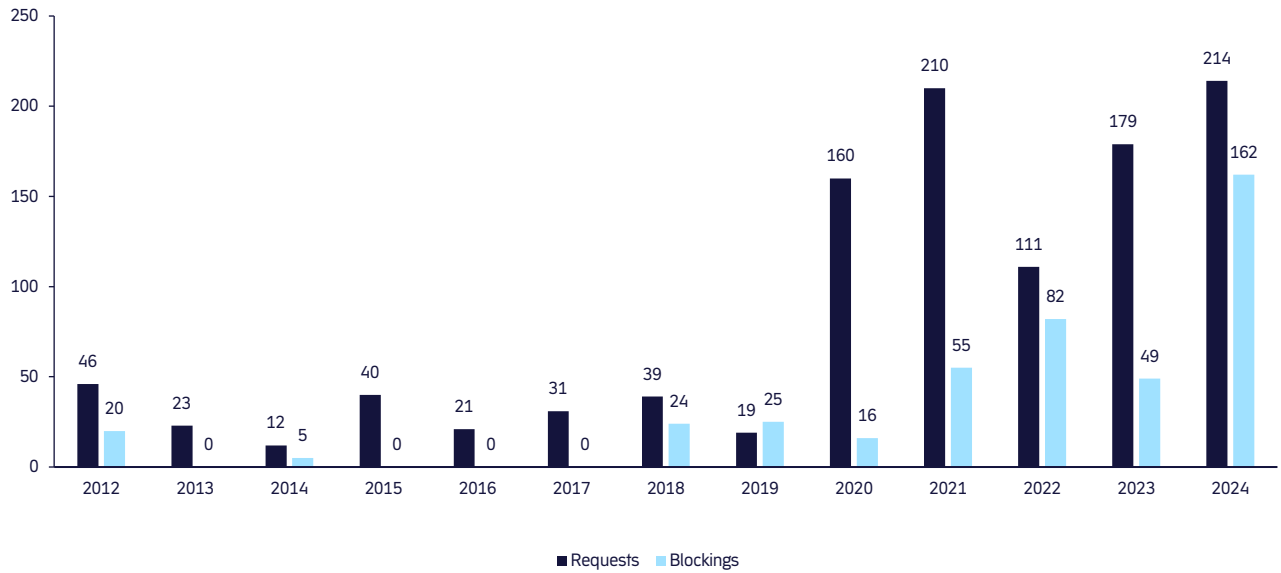
If the Danish Gambling Authority becomes aware of illegal poker clubs, we inform the police. The Danish Gambling Authority has assisted the police in one case when inspecting an unlicensed poker club in 2024.

Appendix

4

4.1 Appendix 1: Overview of the number of requests and blockings since 2012

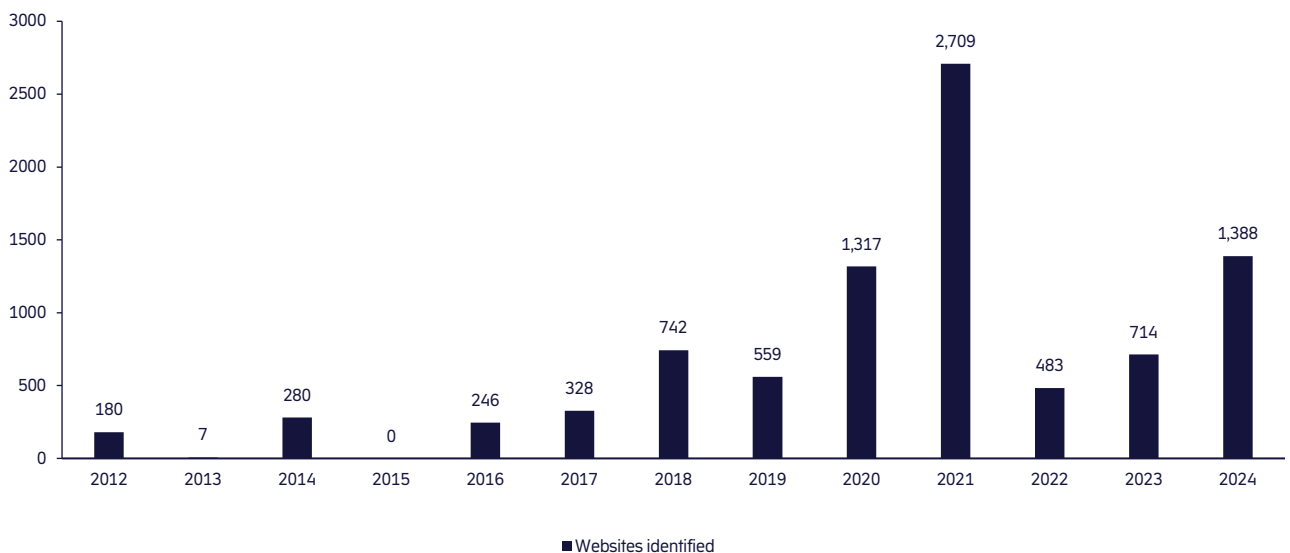
Figure 1. Number of requests and blockings from 2012-2024



Source: The Danish Gambling Authority

Note: Several of the requests concern multiple websites that have the same owner. Therefore, one request can cover more than one website.

Figure 2. Number of websites searched from 2012-2024



Source: The Danish Gambling Authority

In 2021, the Danish Tax Agency's anti-fraud unit carried out a broader search, which among other things also showed previously searched websites etc. This explains the large number of searches in 2021.

4.2 Appendix 2: Published statistics from H2 Gambling Capital

The Danish Gambling Authority continuously monitors the development of the channelisation rate in the European countries. The channelisation rate refers to the proportion of online gambling spending that comes from gambling operators that are licensed to offer gambling products and services in the country in question. The channelisation rate thus shows how much of the online gambling spending takes place on websites that must follow the country's rules for offering gambling.

The graph below shows that Denmark still has a high channelisation rate on the online space, compared to other European countries. In 2024, there was an increase in the channelisation rate compared to 2023.

Table 1. Channelisation rate for the online market

Ranking	2022		2023		2024	
	Country	Channelisation rate	Country	Channelisation rate	Country	Channelisation rate
1	United Kingdom	96,84%	Czech Republic	97,17%	Czech Republic	97,43%
2	Czech Republic	96,56%	United Kingdom	96,70%	Italy	97,22%
3	Italy	93,15%	Italy	94,36%	United Kingdom	96,04%
4	Sweden	90,57%	Sweden	91,97%	Bulgaria	93,10%
5	Bulgaria	89,55%	Serbia	91,07%	Romania	91,47%
6	Denmark	89,21%	Denmark	90,15%	Sweden	91,35%
7	Estonia	89,17%	Bulgaria	89,89%	Spain	90,95%
8	Serbia	89,16%	Romania	89,89%	Denmark	90,29%
9	Romania	88,72%	Estonia	89,77%	Türkiye	88,40%
10	Belgium	88,31%	Portugal	89,58%	Serbia	88,13%

Source: H2 Gambling Capital

