

English summary of Kindred's official reply to The Swedish Ministry of Finance's memorandum "New gambling responsibility measures due to the spread of the covid-19 disease" (Fi2021 / 04095)

Stockholm, January 17, 2022

Kindred rejects the online gambling measures proposed in the memorandum – our overall assessment is that the measures weaken rather than strengthen consumer protection. The arguments put forward in the memorandum are speculative and not based on facts.

- Kindred's objections to the measures are based on the fact that they:
 - makes it more difficult for licensees to fulfill their duty of care
 - have a negative impact on channeling by encouraging gambling at unlicensed gaming companies
- Sweden's actions differ greatly from the rest of the EU – there is currently no other member state in the EU that we know of has or plans to introduce Covid-related sanctions on online gambling
- Requirement to introduce added measures on top of previous measures within a very short time frame risks leading to a low-quality implementation of the measures and a random distortion of competition in the Swedish gambling market
- If the government, despite the serious objections raised, wants to move ahead with temporal gambling responsibility measures, the simplest and least problematic solution is to return to exactly the same measures that applied during the previous restriction period

[Link](#) to the proposal (in Swedish).