

Stockholm, December 15, 2025

The Swedish Trade Association
for Online Gambling



LETTER TO THE MINISTRY OF FINANCE

Dear Elisabeth & Niklas,

We who sign this letter represent the licensed gambling industry in Sweden. We are addressing you today on an issue of great importance to the gambling market, namely the gambling company ATG's proposal in which it is recommended that the Swedish government should act like its British counterpart in terms of gambling tax.¹ The British government recently decided to increase gambling tax dramatically, but at the same time make an exception for betting on horses.

The gambling tax in Sweden is currently 22 percent of the so-called gambling surplus, i.e. the money that remains with the gaming company after winnings have been paid out to consumers, i.e. the companies' turnover. ATG – today formally independent but until recently controlled by the government with a majority position on its board – is now pleading for a different arrangement. Horse betting should be given a lower tax rate according to ATG, namely a return to the original gambling tax of 18 percent. This should be financed, ATG suggests, by increasing the tax on other gambling to 26 percent. It can be recalled in this context that until the reregulation of the gambling market in 2019, ATG paid 35 percent tax on its gambling surplus. The company has therefore de facto already received a significant tax reduction with the reform.

ATG has been pushing its thesis about differentiated gambling tax since the government proposed an increase in gambling tax from 18 to 22 percent in October 2023, which later also was implemented. The issue has subsequently become topical since the Labour government in the UK recently decided to proceed in exactly that way.

With this letter, we would like to draw the government's attention to the fact that such a hypothetical initiative from the Swedish government would counteract the primary goal of Swedish gambling policy. The government expresses this goal by stating that “[t]he negative consequences of gambling should be reduced” and “[g]ambling for money should be covered by strong consumer protection”.²

A basic requirement for the government to be able to achieve its goal with its gambling policy is that the gambling that takes place takes place on the regulated gambling market. The impact of the government's gambling regulation is determined by the degree of channelization, i.e. how high a proportion of gambling takes place in a regulated

¹ <https://omatg.se/blogg/storbritannien-visar-vagen-sverige-bor-folja-efter/>

² <https://www.regeringen.se/regeringens-politik/spelpolitik/mal-for-spelpolitiken/>

manner (as opposed to unregulated gambling, often completely without the consumer protection offered by licensed gambling companies).

The government's goal for a long-term sustainable gambling market is that at least 90 percent of gambling should take place on the regulated licensed market.³ Sweden has not been at that level except during the first successful months of the new gambling regulation in 2019. The Swedish Gambling Authority's latest estimate of the degree of channelisation is that it is 85 percent.⁴ Other institutes independent of the state also measure the Swedish channelisation and the result is always the same in the sense that the 90 percent level is never reached.⁵

This general estimate of channelisation also includes large differences between different types of gambling products. The channelisation rate for betting is always higher than for online casino. In the measurement described above from the Swedish Gambling Authority, betting, typically sports and horse betting, has a high channelisation rate of between 92-96 percent. Online casino has a significantly weaker channelisation rate of between 72-82 percent. All other institutes that measure the channelisation rate divided between the different gambling products confirm this difference.

The level of the tax rate is certainly not the only factor that determines whether the consumer chooses to gamble within the Swedish licensed market or outside it. But that said, it is an important factor, especially for high-volume players, since the tax rate has a decisive impact on the price of the gambling product. High-volume gamblers tend to have greater knowledge and interest in the price of the product than low-volume gamblers.

ATG's argument for lowering the tax on horse betting and raising it on online casino, among other things, is that online casino would be a riskier product than horse betting, and that differentiated tax rates should encourage consumers to choose horse betting to a greater extent. This argument is at best schematic. The data available clearly shows that for risk players, all games are risky games, including horse betting.

ATG also argues that horse betting plays an important role as a financier of the horse industry in general.

This may of course be the case with regard to the horse industry, but here we would like to emphasize again that this is not the goal of the government's gambling policy (let alone that the government may of course have goals in other contexts for the horse industry).

³ SOU 2017:30, del I, s. 25 and prop. 2017/18:220, p. 285.

⁴ <https://www.spelinspektionen.se/globalassets/dokument/rapport-o-remiss/kanaliseringsgrad-pa-den-svenska-spelmarknaden-2024.pdf> p. 24

⁵ <https://www.bos.nu/wp-content/uploads/2025/10/Kampen-i-kanalisering-Lardomar-fran-tva-nordiska-lander-slutlig-17-oktober-2025.pdf> p. 18-26

The goal of the gambling policy is primarily the protection of the consumer. To then lower the tax in the gambling segment, gambling on horses, which has no problem with channelisation at the expense of the gambling segment that has major problems with channelisation, online casino, would be reckless.

The gambling tax is important for the degree of channelisation. Online casino has a very low degree of channelisation with a consequent low coverage rate for consumer protection. Betting generally has a higher degree of channelisation, and within that segment a particularly high degree of channelisation in horse betting. A recently presented report from the law firm Nordic Legal states that "[a] probable explanation for Sweden's higher figures in betting is the popularity of horse and trotting betting, which in principle takes place within the framework of the pool game provided by AB Trav & Galopp (ATG)".⁶

It is generally accepted that the channelisation of horse betting is around 98-99 percent. To then give this gambling product special tax reductions appear incomprehensible from a consumer protection perspective. We therefore urge the government to refrain from differentiating the gambling tax. Even though, due to the problem described above, it may appear tempting to advocate for an *increase* in the tax on horse betting, this is not something we advocate. We support Sweden's position with one and the same level for all forms of gambling when gambling tax is levied.

Kind regards,

Richard Brown, CEO, Glitnor
Stella David, CEO, Entain
Christer Fahlstedt, CEO, Paf
Ian Ince, Chief Compliance Officer, Playtech
Jesper Kärrbrink, CEO, Immense
Pontus Lindwall, CEO, Betsson AB
Nicolas Lund, Managing Director, Nordplay
Francesco Postiglione, CEO, Casumo
Juergen Reutter, CEO, ComeOn
Alexander Stevendahl, Founder, Immense
George Ustinov, CEO, Enlabs
Mattias Wedar, CEO, LeoVegas
Per Widerström, CEO, Evoke

Gustaf Hoffstedt, Secretary General, BOS

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⁶ <https://www.bos.nu/wp-content/uploads/2025/10/Kampen-i-kanalisering-Lardomar-fran-tva-nordiska-lander-slutlig-17-oktober-2025.pdf> p. 21