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Player tracking in itself may not be enough for efficient reduction of gambling harm, but combined with a personal gambling license could provide new possibilities to tracking gambling-related harm

Newall and Swanton [1] suggest that player tracking could have a role in reducing harm from online gambling. Player tracking alone may not be enough, but combined with a personal gambling license it has potential for reducing gambling-related harm.

The contribution by Newall and Swanton [1] is an interesting new addition to the discussion on how to reduce gambling harm via player tracking. As the authors note, until recent years player tracking has been mostly used to the advantage of the gambling industry. Gambling companies are able to gather much information, of which the gambler is mostly unaware. Recent access to data of the gambling company Flutter based on the United Kingdom's public information laws showed that there were ~93 data points about one single individual [2].

The idea of using this data from player tracking for harm reduction is an intriguing idea. However, the mandatory gambling cards issued in Finland and some other countries for this purpose are used also in a problematic manner. The Finnish government monopoly in online gambling will be dismantled by 2026, and the government-owned operator Veikkaus is now trying to get as many consumers as possible to register for its own gambling card to grow its customer base. By doing so, it will gain a competitive advantage over competition from abroad, when the online market opens. This aim of channeling gambling proceeds back to Finland is, therefore, also a political strategy [3].

Although in Finland gambling is regulated through a state monopoly, with a public health justification, the government has a conflict of interest, because government in practice is the gambling monopoly [4–6]. The effective collection of gambling proceeds is an important goal for governments upholding gambling monopolies [7]. Especially in a situation in which the tax burden is increasingly on individuals in the form of sales and excise taxes, governments are keenly interested in upholding the gambling revenue stream [8–10].

Because not even the government-owned gambling operators are to be trusted with the task of advancing public health, the question is

how much the universal player tracking system would be able to accomplish via privately held operators. Newall and Swanton [1] give examples of the current social responsibility measures of gambling operators, such as contacting consumers who gamble 'excessively'. Based on available information from Swedish operators, including both monopolistic and privately held companies, it is difficult to say how much is achieved with this practice [11]. The most effective measures to reduce gambling-related harm are the ones that apply to all gamblers, reducing total consumption [12].

Although universal player tracking may be a step into right direction when not controlled by the gambling industry itself, as Newall and Swanton [1] suggest, additional measures are needed to ensure that player tracking reduces the harm as effectively as possible. A personal gambling license (cf. driver's license, a permit to carry a weapon) could be introduced alongside player-tracking [13; see also 14, 15]. The technology required for digital identification is available and already widely used by the gambling industry. An app could be used to certify not only that the user is an adult, but also to ensure that the person can afford the gambling. Personal gambling licenses could also be used to control gambling with legal, regulated gambling operators, because the winnings would not be payable without registration of a valid personal license.

In addition to control of money flows, personal gambling licenses could be used to check that the holder understands the harmful nature of gambling activity before s/he initiates gambling. The purpose of a driving theory test is to ensure that the candidate for a driving license has sufficient competence and understanding of all possible traffic situations. In a similar manner, one could introduce a theory test for gambling. For example, odds of winning and meaning of return percentage are often poorly understood by gamblers. In case of issues, the personal gambling license could be revoked.

One can claim that a personal gambling license combined with universal player tracking is not an answer to all gambling problems. In a similar manner, a driver's license does not prevent all car accidents. The perceived 'threat of the Black Market' still remains, but it is questionable whether such a market is significant or even something that

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regulators could not address effectively [16]. This line of thought stems from the argumentation advanced by harmful industries that ‘nothing can be done until everything is done’ [17]. By combining a personal license with player tracking, one could at least move the task of reducing gambling harm away from companies.

DECLARATION OF INTERESTS

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