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policy paper

National Market Protectionist Gambling Policies in the European Union: The Finnish Gambling Monopoly Merger as a Case in Point

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Abstract

A rapidly growing globalized and digitalized gambling industry has compelled European jurisdictions to take action in order to secure some level of gambling market control, to secure public funds from gambling, and to protect citizens from gambling-related harm. This study concerns the market protectionist endeavour to merge three gambling operators into one state-owned monopoly in Finland in 2017. The justification of the systemic change is analysed in key policy documents and media reporting that discerns the political narratives that nudged the monopoly merger from the idea stage to its completion. Within the narratives, the merger is presented as necessary due to the threats of market intrusion by foreign gambling operators and the likelihood of an internal system implosion framed by European Union (EU) law. The worries expressed in the studied materials plug into a general zeitgeist of globalization. The justifications of the systemic change presuppose the inevitable determination of the change and an innate and constant human desire to gamble. Critical views on the merger were introduced in the media at a late stage, stressing the role of the media as a facilitator and manufacturer of political consent. The study demonstrates how market protectionist justifications can, through the maintenance of a regulated gambling market, assure preservation of national public funds obtained from gambling in the EU. The official gambling policy objective of securing public health played a secondary role in the process.

Keywords: gambling policy, justifications, policy problems, media analysis, Finland

Résumé

La croissance fulgurante de l'industrie du jeu, mondialisée et numérisée, a incité les autorités européennes à prendre des mesures afin d'assurer un certain contrôle sur ce marché, de garantir les fonds publics provenant du jeu et de protéger les citoyens des

dommages liés au jeu. Cette étude porte sur la tentative protectionniste de la Finlande de fusionner trois exploitants de jeux d'argent en un monopole d'État en 2017. On analyse les raisons justifiant le changement systémique dans des documents politiques clés et des reportages dans les médias en mettant en évidence le contenu narratif politique qui a conduit à la fusion du monopole, depuis la naissance de l'idée jusqu'à sa concrétisation. Dans ce contenu narratif, la fusion est présentée comme une nécessité en raison des menaces d'intrusion par des exploitants de jeux étrangers et la probabilité d'une implosion du système interne encadré par le droit de l'UE. Les inquiétudes exprimées dans les documents analysés cadrent avec une tendance généralisée à l'égard de la mondialisation. Les fondements qui sous-tendent ce changement systémique présupposent l'inévitabilité du changement et un désir inné et constant de jouer chez l'être humain. Les points de vue critiques sur la fusion sont présentés tardivement dans les médias, ce qui confirme le rôle des médias comme facilitateur et créateur de consentement politique. L'étude montre que les justifications protectionnistes du marché peuvent, par le maintien d'une réglementation du marché des jeux, garantir l'apport de fonds publics nationaux générés par les jeux de hasard dans l'UE. L'objectif officiel de la politique en matière de jeu visant à protéger la santé publique a joué un rôle de second plan dans le processus.

Introduction

In countries all over the world, a rapidly growing globalized and digitalized gambling market is calling for adjustments in gambling policies and legislation. A common concern pertains to the preservation of state incomes from gambling revenues threatened by the growth of an unregulated online market (Laffey, Della Sala, & Laffey, 2016; Myllymaa, 2017). In Finland, whose residents spend the second highest amount on gambling in the European Union (EU), this represents a significant part of the state budget: 1.2 billion euros in 2014, 2.2% of total government revenue (Roukka, 2016; "The World's Biggest Gamblers," 2017). Although the lack of reliable European-level statistics on gambling makes it difficult to compare other governments' dependence on gambling revenues, in Sweden, a country with a similar monopoly system (which will be replaced with a licensing system in 2019), gambling revenue constituted 0.7% of total government revenue in 2015 (Carlgren, 2018; Lotteriinspektionen, 2017). In Finland, the proceeds from the lottery tax (218 million euros in 2014) are added to the general budget of the state. The remainder of the total gambling revenue (ca. 1.0 billion euros) is diverted into grants for activities in arts, science, sports, and promotion of health and wellbeing For most of the beneficiaries, gambling revenue is the most important source of income. Until 2017, a system with three state-controlled monopoly operators with three separate product palettes—lottery, slots, and horse betting—assured in principle that gambling operators did not compete internally while circulating gambling incomes for the public good. In 2017, the three operators were merged into one state-owned gambling monopoly that

operates all legal forms of land-based and online gambling (lotteries, slot machines, casino games, horse and sports betting).

This study concerns the political justification of introducing a more centralized monopoly system in Finland. This was an exceptional solution in view of how other EU member states have responded to recent gambling market transformations. The only other European country that has chosen to focus on safeguarding its monopoly system is fellow Nordic country Norway, a member of the European Free Trade Association, a partner of the EU (cf. Borch, 2015). Most EU countries have chosen to open up their online gambling markets to operators in other member states (lottery being the only game that is often kept within a monopoly structure) to the extent that public gambling revenues are still secured through taxation and licence fees (Laffey et al., 2016). The EU thus seems to be open to considerable discretion among member states to internally accommodate the contradictory aims of public health and fiscal policy in gambling market regulation (Doukas & Anderson, 2008; Van den Bogaert & Cuyvers, 2011).

In light of EU law, market restrictions such as a monopoly cannot be justified by the fiscal importance of gambling revenues to a member state (Laffey et al., 2016). A passable public health justification for the sustenance of gambling monopolies in the EU is the prevention of gambling-related harm (e.g., Laffey et al., 2016; Myllymaa, 2017, pp. 233–234; Tammi, 2008). This justification was also pleaded in 2017 when the three Finnish state-controlled gambling monopoly operators—Veikkaus, RAY, and Fintoto—were merged into one state-owned monopoly with a gross gaming revenue of 1.8 billion euros and exclusive rights to all gambling (with the exception of one operator, PAF, established in the autonomous jurisdiction of the Åland Islands).

The Finnish case is worth highlighting in a discussion that principally centres on how states regulate harmful products with the contradictory aims of public profit maximization and public health. Gambling policies are often criticized for their incoherence, particularly in the EU. Laffey et al. (2016, p. 13) argue that member states in the EU have given priority to national economic interests and only "when it suited their case, used arguments about public health." Similarly, Myllymaa (2017) calls the discourse on gambling in the EU an "organized hypocrisy" (p. 233): Member states have learned to use the public health arguments in order to justify the national protection of state incomes from gambling.

In order to unfold how the unique monopoly merger was discursively enabled and scaffolded in political and popular discourse, we used Carol Bacchi's "What's the problem represented to be?" (WPR) approach in this study, which inquires into the policy problem representations, deliberation, and discourse in policy documents and in mass media materials. We discerned the storylines of WPR stories that pushed the problem solution towards the fusion of gambling operators into one state-owned monopoly company.

Methods

The policy material consisted of publicly available key policy documents ($N = 4$) and media coverage ($N = 82$) of the gambling monopoly merger. The inclusion criteria for the key policy documents were that they would discuss the official justifications and aims of the policy change during the different stages of the legislative process. Of all such documentation available, only two policy documents were excluded: the statements by the two committees of parliament, which were assessed as not introducing any novel justifications of interest for the scope of this study. One of the weightiest policy documents in the merger process was a report that introduces three alternative monopoly system models prepared for the government for selecting the most suitable solution (Ministry of the Interior, 2015). The preparation of the report was initiated in January 2015, shortly after the government in December 2014 had decided that a merger of the existing monopoly operators was needed that involved either all three or only two of them. The report was written by officials, but the representatives of the beneficiaries of gambling revenues (i.e., civil society organizations) were also involved when the sections on revenue distribution were considered. Another key policy document in the process was the government's monopoly merger proposal to parliament (Finnish Government, 2016). This document contains justifications for the necessity of merging all three operators into one state-owned monopoly. The proposal was written by officials but statements by key stakeholders were integrated. In the Finnish Parliament, a committee is typically given responsibility for the preparation of government proposals that will be voted on in a plenary session of parliament. The tasks of the committee involve inviting statements from other committees. The statement provided by the Social Affairs and Health Committee of the Parliament (2016) and a report by the Administration Committee of the Parliament (2016) were both included in the data, as they contained amendment requests to the original government proposal. Both committees heard experts and stakeholders in the preparation stage of the statements.

The media material consisted of a corpus of 82 Finnish media items. A total of 54 text items were collected through the web-based archive service of the largest national daily newspaper, *Helsingin Sanomat* (*HS*). *HS* is a politically unbiased mainstream publication that serves the study aim of examining public discourse regarding a political matter. *HS*, which is the largest daily in the Nordic countries, has, over the years, prevailed as a powerful and influential institution in Finnish society (Rahkonen, 2007, p. 86). Additional media materials concerning the gambling monopoly merger were collected through Google News and Google with search term combinations such as "Veikkaus RAY Fintoto merger," "new monopoly Veikkaus," and "the gambling fusion" (search terms in Finnish: *Veikkaus RAY Fintoto yhdistyminen*, *uusi monopoli Veikkaus*, *rahapelifuusio*, respectively). Through this strategy, 28 additional media items, mainly from different Finnish regional newspapers (printed and online) and Yle News, were collected.

Quality control of the media items was assured by assessing each item in terms of source (media publication): 10 items by Yle (Finland's public broadcasting company),

11 by regional newspapers (such as *Karjalainen* and *Keskipohjanmaa*), four by *Talouselämä* (one of the biggest business newspapers in Nordic countries), two by *Iltalehti* (Finnish evening paper, tabloid), and one by MTV (commercially owned online and television media company). These are all well-known, established journalistic products in the Finnish media landscape. They are listed in media directories (such as earthnewspapers.com) and their dissemination and circulation are registered, for example, by Media Audit Finland. The entire set of media material ($N = 82$) contained a variety of media text genres, including news pieces, analyses, and short notices. The material was published between September 2014 and June 2017, and it spanned the period from when the question of a merger first started to appear until the monopoly was established and put into practice.

To discern the functions of different types of reasoning in the deliberation of the systemic change (cf. Fischer, 2012), we used Carol Bacchi's (2009, 2016) WPR question as an analytical vehicle. Bacchi's approach is based on genealogical and post-structural ontology in which policies are not regarded as solutions or responses to pre-existing problems per se, but the articulation of problems constitutes policy questions. This distinguishes WPR from mainstream public policy analysis in which policies are understood as a matter of processing problems that societies or political systems are facing (see Hoppe, 2013). For example, in their authoritative *Handbook of Public Policy Analysis*, Fischer, Miller, and Sidney (2007) see public policy analysis as historically entangled with a problem-solving function: "Policy analysis emerged to both better understand the policymaking process and to supply policy decision makers with reliable policy-relevant knowledge about pressing economic and social problems" (p. xix). In public policy analysis, policy problems are thus often presupposed to exist uncritically and self-evidently outside policy process and outside politics. The analytical value of WPR lies precisely in its focus on the political aspects related to the constitution of policy problems.

In contrast to mainstream public policy analysis, WPR premises that government in contemporary societies takes shape through problematizations, that is, through different ways of constituting problems in policies (Bacchi, 2015). In other words, instead of accepting the self-evident nature of policy problems, WPR focuses on critically questioning whether particular policy problems can be analysed as being constituted and how they might be connected to the practices of government. This focus is narrated through public stories that imply certain solutions. The WPR approach is a good companion to political sociology views on societal structure as being articulated and reproduced in political construction rituals (see Heiskala, 2000). These problem representations play a unique role in the constitution of social problems because they are supported by the legislative apparatus and the production of government knowledge, and they become institutionalized over time. Unlike many competing problem constructions, the problem representations that policies enact can be enduring: "They exist *in the real*" (Bacchi, 2016, p. 33, emphasis in the original). In the case of the Finnish gambling monopoly merger, the newly enacted system was discursively construed in problem representation stories (WPR stories) during the deliberation and preparation phase.

In practice, the WPR approach consists of seven analytical steps with related questions (for details, see Bacchi, 2009, 2015, 2016). The questions do not constitute a rigid methodology but more of a *perspective* that is applied to policy cases, and researchers who use the approach need not take into account all of the questions (Bacchi, 2015, p. 133). For this article, we focus mainly on the two first analytical steps to discern the stories that push the question towards a resolution: Question 1: What is the problem represented to be in a specific policy? Question 2: What implicit presuppositions or assumptions underlie this representation of the problem?

As "public policies *constitute* policy 'problems'" (Bacchi, 2009, p. 2, emphasis in the original), the purpose of Question 1 is to reveal what is thought to be problematic within a concrete policy proposal, in this case the Finnish monopoly merger. Bacchi (2015) considers Question 1 as commonsensical: "What we propose to do about something indicates what we think needs change and, hence what we think is problematic" (p. 132). Policies usually consist of many proposals and it is possible that there are multiple problem representations within a policy, even contradictory problem representations. The purpose of Question 2 is to analyse the presuppositions underlying the policy problem representations. The task here is to identify the conceptual logic implied by the problem representation, that is, the often deep-seated cultural and political meanings that make the problem representation coherent and intelligible (Bacchi, 2009). Moreover, governing presupposes that the governed individuals or populations possess certain kinds of qualities, self-identities, or capacities for action (Burchell, 1991). In short, the practices of government presuppose the existence of certain kinds of subjects.

We used the qualitative analysis software tool ATLAS.ti when structuring and analysing the material (hereafter referred to as coding). Coding of the policy documents focused on identifying the problem representations and corresponding argumentation and logic (Bacchi's Questions 1 and 2). The aim of coding the media material was to group aspects of it that allowed us to discern coherent stories of policy problem representations, argumentations, and justifications regarding the merger. We called these WPR stories.

In line with our overall framing of a critical policy study, the media material served not only to unfold a public discussion, but also to provide insight into the media's bystander and co-constructive role in the problem representations surrounding the policy change. The media was thus seen as intervening in the political life that contributes to the formation of plural solidarities or "publics" (cf. Cottle, 2006). The public's role in systemic change such as the merger of the three monopoly operators can be viewed as parallel to and entangled with the discursive strategies of other democratic institutions, such as the executive and representative power involved in the problem constructs of the policy documents. In questions that are raised and suggested by the government and decided through parliamentarian processes, one role of the media becomes to inform citizens about the political processes and to serve by providing contextualizing, critical, and supportive explanations of the developments in the government sphere.

Results

Four Storylines Pushing Towards a Resolution

After structuring and analysing the material, four main WPR storylines materialized. The stories, which partly overlap in their argumentation, involve problem constructs that are portrayed as being solved through the state gambling monopoly fusion. The first story concerns the threat of an imploding gambling policy system due to its non-compliance with the EU framework. The second story draws on a general zeitgeist regarding great and rapid global technological transformations and the need for Finland to stay informed and competitive. The motif of the third story is closely related to the second one and concerns the need to protect the national gambling policy system against outside forces in terms of online operators. The fourth story can be viewed as a meta-narrative that comments on how the process was able to gather political consensus for systemic change. This storyline goes beyond the representation of the three-operator monopoly system as a problem: It also underlines the key WPR idea that the new policy constituted the construct of the old monopoly system as a problem.

Implosion storyline: Internal competition. Politicians, particularly the representatives of the Minister of the Interior, used the concept of political will to push the developments in the direction of the monopoly merger. "The political will is to sustain the monopoly system. For this we have the support from the European Commission," stated Päivi Räsänen in *HS* in December 2014 (M. Nieminen, 2014). The EU had many roles in the reasoning around the situation: as a threat to the current system (with EU law running the errands of the free market competition), as a guarantee for a good system (sustaining a monopoly), and as a frame of reference to adapt to in line with both the monopoly exemption from the free market and its expectations (which do not allow internal competitors to compete while leaving other EU operators outside their market). The message from policy makers was that the new system would be safe and that the Finnish people could put their trust in it to continue to involve all components of importance (Junkkari & Nieminen 2014; M. Nieminen, 2014; Raeste, 2015a).

During the preparation of the gambling policy change, the Finnish government represented the three-monopoly system as problematic in the policy documents in view of EU law, with reference to the risk of internal competition developing between the three existing Finnish gambling monopoly operators. To avoid internal competition, each monopoly operated a distinct set of games (in principle: lotteries and sports betting, slots and casino games, and betting on horse races). However, the products could, especially in their online variants, begin to resemble each other to the degree that an internal competition could start to threaten the monopoly system. As non-Finnish gambling operators in the EU would not be able to compete with the Finnish monopoly operators, this could be viewed as discriminatory against operators from other member states and thus entail a future breach of EU law. Another risk for a possible situation of internal competition put forward by the government was an increase in the marketing of gambling products, which would

be at odds with the official main aim of Finnish gambling policy: the reduction of social and health problems related to gambling (Ministry of the Interior, 2015). A one-operator monopoly was argued to remove the risk of such internal competition (Ministry of the Interior, 2015).

Media reports also represented the three-operator system as carrying inherent risks of being in breach of EU law. Prime Minister Stubb mentioned the risk that internal competition within the three-operator system could conflict with EU law (Junkkari & Nieminen, 2014). Chief Secretary Päivi Nerg feared that the gambling products of the three operators would start to overlap and that then there would be a risk that someone would complain about this situation to the EU, and the European Commission would get involved again (Palojärvi, 2015). Nerg was referring here to the infringement proceedings that the European Commission commenced against Finland and several other member states in 2006. The European Commission suspected that the regulation of online gambling in the member states in question was in conflict with EU law. The infringement proceedings against Finland were brought to an end in November 2013 when the European Commission declared that, after amendments were made to the Lotteries Act, the Finnish legislation was no longer in conflict with EU law.

The monopoly merger was considered to be justified in terms of competition; Nerg felt it should go ahead in order to better compete with operators from abroad and to prevent internal competition between existing operators (Palojärvi, 2015). With a one-operator monopoly system, the internal competition dilemma would be solved, explained the Minister of the Interior, Minister Räsänen, in a news piece in *HS* in March 2015 (Raeste, 2015a).

In this storyline, the judicial and economic justifications of the merger were emphasized. The merger was represented as a preemptive measure to guarantee the future of the gambling monopoly system. This mode of representation was readily accepted in the media and left largely unproblematized, especially in the early stages of reporting. The storyline was also closely related to another storyline in which the merger was represented as a necessity determined by the zeitgeist.

Zeitgeist: We need to be up to date! In the policy documents, the one-operator monopoly system was represented as one that would be more soundly protected from any future charges of violation of the free market principles of the EU:

> In this alternative, the future development of the rising trend of overlaps between the game products, generated by *the changes in the operational environment* [emphasis added], and the likely, and from the EU law perspective problematic, competition between the operators will be removed. (Ministry of the Interior, 2015, p. 41)

The alternatives to the merger of the three operators were (a) the merger of only Veikkaus and RAY and (b) the maintenance of the old system (Ministry of the

Interior, 2015). In the previous quotation, the problem of possible unacceptable competition between the three monopolies was considered to be related to "changes in the operational environment." The fear of unwanted competition between the existing Finnish operators was no longer represented as merely a legal matter. It was suggested that, because of technological development and changes in customer preference, the product ranges of the three operators would start to overlap. In short, the idea that each monopoly could operate a set of gambling products that was clearly distinct from the other two sets of products was becoming an obstacle to developing attractive new gambling products: "It is possible to modernize the gambling supply within the monopoly system, but the three-operator system curtails this possibility" (Finnish Government, 2016, p. 26).

In the media texts from 2014 to 2015, when the problem was first introduced, government representatives were justifying the need for change in the system by referring to the rapid development of the gambling business as a result of digitalization. Prime Minister Alexander Stubb stated that because of digitalization and online gambling, the whole gambling industry was being reorganized globally (Junkkari & Nieminen, 2014). He pointed out the need to answer to new demands, as the character of gambling had changed to the extent that the changes threatened the old gambling system. The discussions involved connotations of great transformations for which Finland must be on the alert. Minister of the Interior Päivi Räsänen explained that "we need to be up to date with what's going on" and related it to the same technology-change zeitgeist (M. Nieminen, 2014). Preparation for the system change was accounted for as a reaction to the rapid and pronounced transformations in gambling environments, in particular the increase in online gambling.

The new technological developments in the gambling sector formed a storyline through which the Finnish government represented the existing three-operator gambling monopoly system as problematic. What materialized was a problem construct of market pressure that demanded active policymaking. Finland and the Finnish gambling operators were represented to be in a situation in which urgent reaction to the demands of the "zeitgeist" was necessary. The great technological, social, and economic forces of development were represented as forcing the merger of the three operators.

In the constitutionof the three-operator gambling system as problematic, a specific presupposition underlay the zeitgeist storyline: an *erasure of agency*. This term refers to all of the ways in which technological development or more general changes in operational environments are represented in a deterministic way. The agency and capacity of the government and the Finnish gambling operators was undermined: "In the development of gambling products one tries to react to changes in gambling behaviour and to utilize the technologies commonly employed by consumers" (Ministry of the Interior, 2015, p. 22).

Within this storyline, the Finnish government, operators, and other stakeholders materialized as passive bystanders in the currents of this determination. The passivity or erasure of active agency in terms of possibilities to manage market development

functioned as a way to justify and emphasize the *necessity* of revising gambling policy. Interestingly, in the policy documents, Finnish actors were considered to be endowed with active agency only when the beneficial effects of the new policy were discussed: "In a one-operator gambling monopoly model there is . . . a need to still define the forms of gambling that can be legally operated. *In this way, it is possible to direct the development of gambling products in advance to an acceptable direction* [emphasis added]" (Finnish Government, 2016, p. 28).

The Finnish government was represented in the quotation as capable of actively directing the development of gambling products in Finland in the case of a one-operator system. This enabling of agency stands in stark contrast to the erasure of agency mode of representation that permeated most of the discourse on technological development in the material. The Administration Committee of the Parliament (2016) argued in its report that "by developing new legislation it will be possible to influence the prevention of an unlawful foreign supply of gambling as the range of gambling products diversifies" (p. 8). In both texts, active agency—in terms of an independent, strong, capable, and able state—emerged as a way to remedy the effects of technological development about which the Finnish institutional actors were represented as having had no part. The presupposition of erasure of agency can thus be seen as a discursive technique that underlined that the need for the merger did not stem from national economic interests (problematic from the EU law perspective), but was determined by forces not under Finland's control.

Protection: Channelling the desire to gamble. In the third storyline, the merger was represented as a matter of protecting the gambling monopoly system against the foreign gambling operators: "If the Finnish gambling supply cannot keep up with international developments, the capability to channel [demand] to the domestic monitored gambling supply will weaken" (Finnish Government, 2016, p. 26). In this quotation, the three-monopoly system is represented as problematic because of the possible future inability of the Finnish gambling system to "channel" the gambling demand to legal gambling alternatives that are operated by the existing three monopolies. The problem would thus be that the operators outside the Finnish jurisdiction, with their new innovative gambling products, would attract a growing share of Finnish gambling. As a result of this development, should it happen, the foundations of the Finnish gambling system would be eroded.

Variation of the same storyline was also found in the media material. The media texts refer to the government's conviction that a one state-owned monopoly could provide gamblers with safer and more controllable game types (Raeste, 2015b). According to the newspaper *Karjalainen*, there was an expectation that the new monopoly could develop more efficient control tools for helping problem gamblers to manage their gambling ("Uusi Veikkaus on aloittanut toiintansa," 2017). Thus, it would make sense to encourage the Finns to play the games of the national monopoly.

The idea of channelling was supported by the problematic presupposition of *naturalization of the desire to gamble*. In the naturalization of the desire to gamble,

the term *channelling*, as in orienting or steering in a certain way, constituted a key concept. But what, then, was being channelled? The answer was "desire," as shown in the following quotation, in which the views of the European Commission are discussed: "The Commission saw that Finland had the regulations necessary for guaranteeing that a policy of monitored growth, which attempts to *channel the desire to gamble* [emphasis added] into monitored operations, is applied to the gambling monopoly" (Finnish Government, 2016, p. 19).

In the same document, the desire to gamble was also mentioned when the foundations of the Finnish gambling policy were discussed: "income acquisition by *exploiting* [emphasis added] people's desire to gamble is only allowed in a limited scale and only for the purposes of charity or to support other ideological activities" (Finnish Government, 2016, p. 6). It is important to notice here that desire, in the sense given to it in the context of this document, referred to striving for fulfilment of innate needs that are not deliberately willed. Desire thus enacted meanings that associated it outside the social or political sphere. This was also highlighted by discursively representing desire to gamble as something that can be exploited, that is, something beyond the conscious rational calculus (see O'Malley & Valverde, 2004).

The previous two quotations are the only mentions of the desire to gamble in the analysed documents. More often it was the notion of "consumer demand" that was being channelled. The government needed to channel consumer demand or the desire to gamble. Channelling, understood as a practice of government, presupposed a population with the desire to gamble that needed to be satisfied through gambling provision. Channelling also presupposed that desire is a permanent feature of the population: Channelling would not make sense if prohibiting all gambling did away with the desire.

Thus, in the logic of channelling gambling, desire to gamble was represented as a permanent feature of the population. This presupposition was, we argue, a politically construed "naturalization of the desire to gamble." In the constitutionor problematization of the three-operator gambling system as a policy problem, this presupposition had a specific function. In the policy problem representation, the channelling capacity of the three-operator system was in danger because Finnish legislation precluded the possibility of Finnish operators to develop novel products that would channel the desire to gamble to the products of the monopoly operators. Insofar as the desire to gamble was represented as a constant, the possibility of creating new gambling demand through marketing and product development was excluded a priori from the logic of channelling. Moreover, the negative consequences of gambling were similarly presupposed to be natural and inevitable (see Livingstone et al., 2018). If the desire to gamble was presumed to be a variable instead of a constant, marketing and product development would create new demand and more gambling-related harms. The political value of the naturalization of the desire to gamble seemed to be precisely related to this: It undermined any calls for gambling policies that decreased demand.

Reaching a political consensus. The fourth storyline that emerged from the media material showed how the old three-operator system was construed as a problem.

At the very first stage of the merger discussion, the voices represented in the media material were not all in favour of the change of the old three-operator monopoly system. Critical remarks were especially raised by the civil society beneficiaries of gambling revenues (M. Nieminen & Niskakangas, 2014; M. Nieminen & Pusa, 2014). A discussion that was lacking from the policy documents, but that was highly visible in media reporting, was the importance of gambling revenues for the public good. Finland has a unique system in which a large part of the support for civil society organizations stems from earmarked gambling revenues. This circumstance has oriented the general public discourse towards presenting gambling as a national good deed—a view that underpins a strong general legitimacy of the gambling system (Järvinen-Tassopoulos, 2012; Matilainen, 2017). According to media quotes of Minister of the Interior Petteri Orpo, there was no political desire to abandon state gambling revenues. He emphasized that if the gambling monopoly were to vanish, it could result in a situation in which the revenues of the beneficiaries would be taken from the state budget (Valtanen, 2016).

The parent organization of the beneficiaries in the social and health fields, Suomen sosiaali ja terveys ry (SOSTE) argued against the merger in the initial phase of reporting (Jungman, Rosenberg-Ryhänen, & Kiukas, 2014). All operators had their own games and the only savings they could arrange after merging would be to reduce game supply "Then there would not be any benefits for the citizens, but rather the contrary," the representatives of SOSTE commented (Jungman et al., 2014). This aspect is interesting because the SOSTE organizations—which all operate in the name of citizens' health and social well-being—expressed the idea that a lesser gambling supply was a worse scenario from the citizens' perspectives. This view can be seen as going against the public health approach of total consumption correlating with both availability and level of harm (Hansen & Rossow, 2012; Markham, Young, & Doran, 2014). It is as if the SOSTE organizations, in this particular statement, had forgotten about gambling having consequences and were only thinking of citizens as people wanting many game alternatives and gambling revenues for beneficiaries. This rationale was also entangled with the presupposition of the constant desire to gamble.

Other beneficiaries also expressed insecurity regarding the support to civil society in the case of the merger taking place. They were worried that other sectors would become beneficiaries of "their" money. For example, the beneficiaries of the revenues of the lottery provider Veikkaus demanded that they be heard and have access to the political process underpinning the merger (M. Nieminen & Niskakangas, 2014).

In comparison to the other gambling operators, the owner of Fintoto, Suomen Hippos, had a lot space in the media, especially during the beginning of the fusion discussion. Suomen Hippos did not want the fusion with RAY and Veikkaus (Arola, 2014). According to the representatives of Suomen Hippos, it was possible to make changes within the current system and making the decision in haste could cause severe damage. Suomen Hippos was worried about a reduction in money and the continuity of its activities (Hakola, 2015).

During the winter of late 2014 and the beginning of 2015, the merger process was not very visible in media reporting. In view of the reintroduction of the question in the media in the spring of 2015, it seems that a mainstreaming of views on the merger had been conducted during the winter. In March 2015, *HS* reported that all political parties unanimously stood behind the idea of merging the operators (Berg, 2015). The representatives of the Ministry of the Interior, Räsänen and Nerg, said that the merger was recommended because it had been prepared carefully by the workgroup and the merger had wide political support among all stakeholders and political parties (Berg, 2015; Raeste, 2015b).

Some of the stakeholders and actors had thus changed their mind during the period under study. For instance, in September 2015, the Secretary General of SOSTE commented: "We believe that one monopoly is more capable of responding to the [foreign] competition and in that way protecting the funding of public health care, sports, research, youth work and horse breeding" (Savolainen, 2015). Suomen Hippos decided that Fintoto would be part of the fusion (Pusa, 2016).

In conclusion, many actors that initially raised critical voices turned out to be supportive of the merger. Clearly, the three-operator system was not a policy problem for several key stakeholders at the beginning of the process; it had to be construed as such. The policy problem needed to be represented in a way that could be accepted by the key stakeholders who were most of all interested in the revenues. Once this was achieved, there were no obstacles to reaching a political consensus. To put it differently in the terminology of the WPR approach, the three-operator system became a problem that started to exist more and more "*in the real*" (cf. Bacchi, 2016, p. 33).

In the media texts, the idea of a political consensus was driven through and represented by the rather opaque concept of political will, signifying shared views between political parties and stakeholders. This element drove the storylines towards their supposed solution, which was the monopoly merger. This reflected the fact that not only did the Finnish political climate represent the Nordic consensus-driven model (cf. Lijphart, 2012; Post, Raile, & Raile, 2010), but that patterns of interrelationships between political and media systems also followed a Northern European or democratic corporatist model (Hallin & Mancini, 2004; H. Nieminen, 2010) in which power sharing and political consensus systems are typical features. From the context of the material in this analysis, the concept of a political will can be characterized as "a sufficient set of decision makers with a common understanding of a particular problem on the formal agenda which is committed to supporting a commonly perceived, potentially effective policy solution" (Post et al., 2010, p. 671). This notion served as an efficient enabler for the progress of the merger process.

The questioning of the fusion process and a discussion about other options for changing the gambling system appeared in the media material only after the political decision making had proceeded to a point of no return in the autumn of 2015. The main criticism concerned the fact that decision makers had emphasized the safe-guarding of funding for beneficiaries and safeguarding the state monopoly system,

instead of discussing issues related to the prevention of gambling-related problems (Myllymaa, 2016; Pajula & Heiskanen, 2016; Toivonen, 2017).

For instance, in an editorial in *HS* in April 2016, researcher Antti Myllymaa of the University of Helsinki pointed out that the largest challenges were yet to come (Myllymaa, 2016). In an interview in the same daily, Myllymaa pointed out the hypocrisy involved in the harm argument only coming into the picture after the merger was a fact: "When the monopoly is justified in Finland, the question of distributing the money to public good is emphasized. Yet, if the Finnish gambling monopoly is justified to the EU . . . the prevention of gambling-related problems is mentioned" (Toivonen, 2017). Myllymaa also brought up the license system as a valid alternative to the monopoly system.

Mari Pajula, the development manager of the national gambling helpline, Peluuri, and PhD student Maria Heiskanen commented on the public discussion of the fusion process, especially the circumstance of it having emphasized securing gambling returns and improving the availability of games: "The returns yielded by the Finnish gambling system benefit many, and the beneficiaries are standing up for their economic interests. We need more courage and will to discuss the practical aims of prevention and reduction of harms" (Pajula & Heiskanen, 2016).

In Table 1, we have summarized the WPR storylines that led to the state monopoly merger: the main problem construct, the conditions and threats that they imply, and the solution (merger of the three operators).

Discussion

The policy documents and the media material unfold four stories of the policy problem representations and the presuppositions underpinning the great monopoly merger. In these stories, the three-operator system was construed as an urgent problem needing to be solved. The problem representations served important political functions: the protection of the monopoly system and the protection of the gambling revenues. The policy documents provided a perspective from within the constructs that drove the progress from the centre of the system. The necessity for change was construed as if it were determined by forces outside the control of the Finnish gambling operators or the state. The political function of this problem representation was to underline that the need for change was not influenced by national financial interests. What is lacking from the documents is a problematization of the basic presuppositions regarding the naturalness of the desire to gamble. The representation of desire to gamble as an inherent feature of human populations—which is common in the gambling legislations of many European countries (Swiss Institute of Comparative Law, 2006)—is particularly problematic because it is at odds with the aim of preventing and reducing gambling-related harms. Insofar as the desire to gamble is an invariable, gambling-related harms are seen as inevitable (Livingstone et al., 2018). The opportunity for a system change towards more centralized control of the market could have involved public health ambitions to increase prevention efforts

Table 1
The WPR Storylines That Orient the Arguments towards a Gambling Monopoly Merger

	The WPR Storyline	Main Problem Construct	Conditions and Threats	Solution
Policy documents and media material	1. Implosion An imploding system that does not comply with the EU legal framework	A likely internal competition between the existing operators risks the compliance of the system with EU law. "The system is not sustainable as it is."	The (online) products of the three existing companies start to resemble each other. The noncompliance with EU law could—through a case trial in the court of justice—overrule the monopoly system.	One state-controlled monopoly
	2. Zeitgeist The synergy between technological advances and global market forces that has led to a massive transformation over which no one has control	Quick technological advances are reshaping the gambling business, the market, and consumer behaviour. "The forces that are threatening the system are massive and quick."	There is lack of autonomy, control, and agency by the Finnish government in a global market world. Online gambling is difficult to control and the Finnish operators are unable to compete with the foreign operators.	
	3. Protection A system threatened by strong and uncontrollable outside forces that needs to be protected	Foreign online operators are pushing their products. Finnish operators are lagging behind in product development and are unable to channel the population's desire to gamble. "The safe and good national gambling control must be safeguarded."	Foreign [bad] online operators will start taking market shares from the Finnish [good] operators. The new monopoly can provide safer services and better tools for the management of gambling behaviour.	
Additional storylines found in the media material (not WPR)	4. Political will The initial stakeholder worries and critiques that shift in favour of the merger	In the beginning, all stakeholders did not agree with the idea of merging the gambling monopolies. "Not everybody directly understood the need for a consensus on this question."	Beneficiaries: What will happen to gambling revenues for the common good? What will happen to Fintoto? A lack of consensus is portrayed as something bad.	One state-controlled monopoly

Note. EU = European Union; WPR = "What's the problem represented to be?" approach.

or to restrict gambling supply (cf. Tammi, Castrén, & Lintonen, 2015). Instead, the worry of losing gambling revenues to foreign operators motivated the merger of the monopoly operators.

In comparison, the media construed the problems a bit differently. Their perspective was more from the outside and a larger repertoire of voices was heard on the matter. The material was larger and spanned a longer time frame. To begin with, some stakeholders—especially those representing beneficiaries in the civil society sector—raised worries about the merger and expressed criticisms of it, but they were in the end presented as mainstreamed and synchronized in favour of the merger. It was as if the problem representation in the policy documents spread and convinced all interested parties that everyone would gain from the systemic change. Finally, after the merger was fact, critique of the policy problem representation—including the EU framing and the argument of preventing outside competition—was presented together with the process in itself.

The presuppositions and assumptions made functioned to guarantee that the monopoly system would serve the nation and its interests, as well as handle all threats and challenges, while sticking to the regulatory framework of the EU. This was a unique development and a unique policy process in Europe. The gambling policy of Norway, the only other European country to safeguard its gambling monopoly system, only highlights the exceptionality of the Finnish case. In Norway, public health concerns have had a real impact on gambling policy and significant restrictions on gambling supply have been introduced (Rossow & Hansen, 2016). Jensen (2017) offers a convincing explanation for this: In Norway, the state gets no tax income from gambling and has thus had less interest in gambling revenues than in Finland. Considering the high level of gambling consumption in Finland and the great dependency of civil society organizations and research on gambling revenues, the justifications for a further centralized monopoly model needs to be critically scrutinized. This study has been a first attempt in this direction.

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