

Impact assessment of the draft technical regulations on a new gambling system

Reform of the gambling system

According to Prime Minister Orpo's Government Programme, the Finnish gambling system will be reformed, opening it up to competition under a licensing model no later than 1 January 2026. The objective of the reform, in line with the Government Programme, is to prevent and reduce the harms caused by gambling and to improve the channelling of demand into a gambling system regulated by law.

The Government submitted a government proposal for a new legislation on the gambling system (HE 16/2025 vp) to Parliament on 20 March 2025. The proposal is currently before Parliament.

The government proposal (HE 16/2025 vp) proposes to lay down provisions on gambling operations and its supervision. The operation of gambling could be carried out under an exclusive licence or a gambling licence. The supply of gambling software used in the operation of gambling would require a gambling software licence. The Act would lay down the conditions for the granting of licences, the procedure for applying for licences and the obligation of the holder of an exclusive licence to pay compensation to the State for the exclusive licence.

The Gambling Act would lay down provisions, inter alia, on the registration of players, the age limit for gambling, the player account and playing with identification, as well as self-exclusion and restrictions on gambling. The Act would contain provisions on marketing, prohibited marketing methods, information to be provided in connection with marketing, sponsorship, and direct marketing bans. The proposal suggests granting the supervisory authority a wide range of powers and rights of access to information. The Act would lay down provisions on the supervisory fee to be collected from licence holders and on administrative penalties to address illegal activities.

The Gambling Act is mainly intended to enter into force on 1 January 2027. Certain provisions of the Gambling Act would enter into force on 1 January 2026.

The supervisory authority's power to issue regulations

According to the proposal, the Finnish Supervisory Agency under the new Gambling Act would be the Finnish Supervisory Agency from the beginning of 2027. The National Po-

lice Board would be responsible for licence activities during the transitional period in 2026 to the extent that the new Gambling Act would apply to licence applications.

The proposal for a new Gambling Act includes a suggestion to grant the supervisory authority five regulatory powers. This concerns a clarification of the provisions of the Act with regard to technical details. Under the proposed Act:

1. According to section 11, subsection 6, the supervisory authority may issue further regulations on the content, form and appendices of the licence application.
2. According to section 44, subsection 6, the supervisory authority may issue more detailed regulations on the reliability of the gambling systems, draw equipment and draw methods used in the operation of gambling, on the technical requirements for ensuring randomness of draw results, on the more detailed form and content of the inspection body's investigation and approval, and on the conditions that the inspection body must meet in order to be approved by the authority.
3. According to section 45, subsection 4, the supervisory authority may issue more detailed regulations on the certificate to be used to ensure that gambling transactions and player account transactions remain unchanged, on the technical format for the delivery of gambling transactions and player account transactions, and on the technical requirements for connection to the interface of the supervisory authority's supervision system.
4. According to section 68, subsection 2, the supervisory authority could issue further regulations on the deadlines for submitting the reports referred to in subsection 1 of the same section and on the content of the reports.
5. According to section 71, subsection 6, the supervisory authority may issue more detailed regulations on the payment procedure, the payment of the fee in more than one instalment and the manner in which the information necessary for the setting of the supervisory fee is to be provided.

Thus, by means of the proposed Act, the supervisory authority is authorised to issue regulations that are strictly limited in scope. The supervisory authority has prepared the regulations in such a way that their content does not conflict with the provisions of the Act. In addition, the regulations do not revoke or impair general legislation.

The regulations of the supervisory authority will further specify the provisions to be adopted under the proposed Gambling Act in terms of technical details. The aim of the regulations is to promote the rights, interests and obligations of applicants for a licence and the equal treatment of operators.

The purpose of the regulations is also to ensure that licence applicants have a correct understanding of the conditions of the licence to be granted and of the requirements, costs and administrative procedures relating to the games of chance to be operated under it.

The adoption of regulations is considered necessary in order to harmonise activities and to ensure that the supervisory authority receives the information and reports necessary to carry out its supervisory task in an appropriate manner.

Consultation on the regulations

The National Police Board, as the supervising authority, has drawn up technical regulations on the basis of the regulatory powers laid down in the Gambling Act. The regulations apply to the above-mentioned licence applications, randomness checks, the security and reliability of gaming systems, the verification of gambling transactions, reporting obligations and the imposition of supervisory fees.

The National Police Board put the draft regulations out for consultation. The draft regulations were available for public comment on the public electronic service Lausuntopalvelu.fi¹. All organisations and citizens were invited to submit comments.

The consultation period was from 3 June 2025 to 15 July 2025. A total of 11 submissions were received via the service, and 10 submissions were received by the registry office of the National Police Board's Gambling Administration. On the basis of the feedback received, clarifications were made to the draft regulations.²

Background and objectives of the impact assessment

The impact assessment of the technical regulations prepared by the supervisory authority has been prepared in anticipation of the adoption of the new Gambling Act in the form proposed in the government proposal (HE 16/2025 vp³).

The objectives, principles and scope of regulation set out in the government proposal form the basis for regulation-level regulation, which is coordinated with the obligations of the proposed Gambling Act. The supervisory authority considers it appropriate that the impact assessment be based on the regulatory structure as a whole set out in the government proposal.

In the light of the above, the assessment of the impact of the technical regulations drawn up by the authority is based on the assessments presented in the government proposal, which have been used in this context to a large extent.

¹ Lausuntopalvelu.fi is an online service that implements the public administration's consultation procedure as an electronic service. It aims to streamline the consultation process by providing a single online service for citizens, organisations and public authorities to publish requests for opinions, issue opinions and process opinions. The service is intended to facilitate the consultation process, public participation and access to information, and to increase the transparency and quality of the preparation and consultation process. (<https://www.lausuntopalvelu.fi/FI/Instruction/Instruction?section=About>)

² [Lausuntopyyntö määräysluonnoksista uutta rahapelijärjestelmää koskien \(HE 16/2025 vp\)](#).

³ Case processing information for HE 16/2025 vp: [HE 16/2025 vp](#)

Impact of the reform from the perspective of EU law

Competitive licensing market and gambling covered by Veikkaus Oy's exclusive right

The government proposal for a new Gambling Act proposes a partial withdrawal from the monopoly system and a reform of the gambling system, under which certain gambling activities would be opened to competition. Under the conditions laid down by the Act, it would be possible to obtain a licence for the operation of such gambling. The proposal would therefore contribute to the free movement of services in the internal market.⁴

The proposal aims to channel demand for gambling to the supply regulated by the new Gambling Act, which can be considered an acceptable objective in accordance with the case-law of the Court of Justice of the European Union. In line with case-law, the national gambling system must ensure that the objectives set are achieved in a coherent and systematic manner. The Court of Justice has also required that national measures aimed at achieving this objective comply with the principle of proportionality. The measures must be such as to ensure that this objective is achieved. The measures must also be proportionate and not go beyond that which is necessary in order to achieve the objective. However, the principle of proportionality does not require a Member State to find, among all possible options, the one with the least impact on the exercise of fundamental freedoms.⁵

In accordance with the government proposal, regulation under EU internal market law does not constitute a fundamental obstacle to national legislation which leaves certain forms of gambling to the exclusive right of the State operator, while certain forms of gambling are subject to competition under the licensing system. In that regard, it is a matter for the discretion of the Member State to determine, inter alia, the level of protection which the Member State wishes to ensure with regard to gambling and the concrete means by which the Member State considers that it can most effectively achieve that objective. Similar regulatory solutions combining exclusivity and a competitive licensing market have also been implemented in several European countries.⁶

The new Gambling Act would provide for a special type of licence covering certain forms of gambling, which could only be granted to a limited liability company controlled by the Finnish State and which would give its holder the exclusive right to operate the forms of gambling covered by the licence in the national territory, i.e. in practice in mainland Finland. Åland, which has a self-governing status, has a separate gambling system and legislation. Gambling operators other than the holder of an exclusive licence would not be permitted to offer the forms of gambling covered by the exclusive right, nor would they be able to obtain a licence entitling them to do so. The proposed exclusivity system therefore constitutes a significant restriction on the freedoms of the internal market, in particular the free movement of services.⁷

⁴Government proposal HE 16/2025 vp, p. 92.

⁵Government proposal HE 16/2025 vp, p. 93.

⁶Government proposal HE 16/2025 vp, p. 94.

⁷Government proposal HE 16/2025 vp, p. 94.

The proposed shift to a partially competitive market also requires particular attention from the supervisory authority with regard to the equal application of technical regulations, so that operators wishing to enter the licensing market have uniform, predictable and non-discriminatory requirements. The technical regulations drawn up by the authority complement the legislative level of regulation with operational precision and enable effective implementation of regulation in the context of market opening.

Impact of the licensing procedure from the perspective of EU law

The proposed system of ex ante exclusive, gambling and gambling software licences would be based on predictable, precise and objective criteria, as proposed by the Government. If the conditions for granting a licence are met, the authority should always grant a licence. In that regard, the authority's discretionary power would be circumscribed.⁸ The technical regulations drawn up by the supervisory authority do not therefore constitute independent discretionary threshold criteria for obtaining a licence. The technical regulations do not create additional conditions which are open to interpretation.

The proposed Gambling Act would lay down provisions on the factors on the basis of which the applicant's reliability and suitability for conducting gambling activities would be assessed. It has been deemed necessary to provide for the assessment of reliability and suitability in the proposed Gambling Act, as gambling is a specific economic activity that entails disadvantages and risks of abuse. To achieve the objectives of the proposed legislation, it could be ensured, for example, that licences are not granted to applicants guilty of abuses or offences compromising the integrity of gambling operations, or to applicants facing financial difficulties. All applicants for the different licence types, i.e. an exclusive licence, a gambling licence and a gambling software licence, should meet the same conditions of reliability and suitability.⁹ The supervisory authority's detailed technical regulations include an obligation to provide the authority with detailed explanations of the applicant's financial conditions, ownership and governance, and criminal background. The aim of the regulations is to ensure that authorisation controls are based on uniform and risk-based procedures.

The predictability and objectivity of the licensing procedure would also be supported by provisions on the content of the information required in an application for a licence, which are determined in the proposed Act on the basis of what information would be necessary to assess the conditions for granting the licence. The provisions on the licensing procedure would also be non-discriminatory, as the granting of a licence would not be restricted as regards the legal nature of the applicant or the country of establishment. A licence holder established in a third country should have a representative in the EEA. Furthermore, the proposal would not contain any provisions on the quantitative limitation of licences in a competitive gambling market. The licensing procedure for a gambling software licence would be lighter than for other licences, and the gambling software licence holder would not have the same reporting obligations as gambling and exclusive

⁸Government proposal HE 16/2025 vp, p. 96.

⁹Government proposal HE 16/2025 vp, p. 96.

licence holders. The supervisory fee for a gambling software licence holder would also be significantly lower.¹⁰

For the reasons set out above, the rules governing the licensing procedure has been considered to be proportionate. Licence decisions would be subject to appeal before a court of law, thus ensuring legal certainty for applicants. Although gambling software activities do not constitute business operations aimed at consumers, they are nevertheless specific economic activities that are directly linked to gambling, the licensing of which has, based on international experience, been considered one of the key means of achieving the objectives of the gambling system reform, as recognised by the case law of the Court of Justice of the European Union. By making gambling software activities subject to licensing, the new gambling system would be more effective in tackling the supply of illegal gambling in the new market situation and thus also contribute to the prevention and reduction of gambling harm. Among other things, the requirement for a gambling software licence would provide the supervisory authority with a broader overview of the supply chains for gambling software and limit the availability of gambling software to operators outside the system who offer games in mainland Finland.¹¹

The proposed Act would confer on the supervisory authority the power to specify the requirements for the form of the data to be provided in an application for a licence as well as the requirements for the completeness of the data content. The supervisory authority's objective in drafting the regulations is that the harmonisation of the application process on the basis of regulations would contribute to the transparency and speed of the administrative process and facilitate the obligation for applicants to assess in advance whether the conditions are fulfilled. The objectives set out above have been taken into account in the regulations, inter alia, through the setting of clearly structured content and presentation requirements for the submission of information.

Impact of exclusive licensing from the perspective of EU law

According to the government proposal, the proposed regulation on licence-based exclusivity would essentially pursue similar public interest objectives as the regulation on Veikkaus Oy's legal exclusive right under the current Lotteries Act. Those objectives have consistently been considered to constitute a legitimate justification for restricting the freedoms of the internal market.¹²

In addition, under the proposed regulatory model, exclusive rights would only be granted to a limited liability company controlled in accordance with the State Accounting Act. Control of the holder of the exclusive right would enable the State to intervene, by means provided for in the Limited Liability Companies Act, in any maladministration in the gambling activities of the holder of the exclusive right, including through the control brought about by ownership. The holder of an exclusive right would thus be subject to ef-

¹⁰Government proposal HE 16/2025 vp, p. 96.

¹¹Government proposal HE 16/2025 vp, p. 96.

¹²Government proposal HE 16/2025 vp, p. 96–97.

fective and continuous State control, as required by the case-law of the Court of Justice of the European Union.¹³

For the purposes of assessing exclusivity under internal market law, it is not considered essential that the exclusivity in the proposed regulation is no longer based on law, but on time-limited licences. It is considered essential that the proposed regulation contains objective criteria for determining the type of operator that can be granted an exclusive licence under the new legislation.¹⁴

The case-law of the Court of Justice of the European Union has accepted national regulatory solutions in which the exclusive right to provide gambling services can only be granted to a public operator. However, it is essential to ensure that the holder of the exclusive right is subject to strict, consistent and systematic State control. Since an exclusive licence could only be granted to a company controlled by the State, this would give the State the right to exercise enhanced control over the holder of the exclusive right, including the right of access to information under the Limited Liability Companies Act and, if necessary, to intervene in any maladministration in its operations in accordance with said Act. The proposed regulatory solution on exclusivity can therefore be considered to meet the requirements of EU law for an acceptable restriction of the freedoms of the internal market.¹⁵

Impact of the regulation concerning the operation and marketing of gambling and their control from the perspective of EU law

In accordance with the objectives of the new Gambling Act, the Act would also lay down provisions on the licence holders' obligation to operate gambling in such a way that the player's legal protection would be guaranteed, irregularities and crime related to gambling could be prevented and gambling-related harms would be minimised. In addition, the objectives of the new gambling system to prevent harm and irregularities would be pursued by laying down provisions on, inter alia, the duty of care of holders of exclusive licences and gambling licences, the reliability of gambling systems, draw equipment and draw methods, and procedures for detecting, preventing and reporting irregularities. The inclusion in the legislation of provisions restricting the operation of gambling has been deemed necessary in order to combat the harmful effects of gambling in the new gambling system.¹⁶

The above-mentioned regulatory interest is supported by technical regulations to be issued by the supervisory authority. The regulations set out more detailed requirements for, among other things, verifying the randomness of gambling games, checking the reliability and security of gaming systems, ensuring the integrity of gambling transactions and harmonising the content and format of reporting. The technical regulations can be

¹³Government proposal HE 16/2025 vp, p. 97.

¹⁴Government proposal HE 16/2025 vp, p. 97.

¹⁵Government proposal HE 16/2025 vp, p. 97.

¹⁶Government proposal HE 16/2025 vp, p. 98.

seen as part of a comprehensive control system, with the aim of ensuring the responsibility and safety of gambling activities at a practical level. The new Gambling Act and secondary legislation, as well as the regulatory oversight of licence holders, also aim to ensure that licence holders adequately fulfil their duty of care and responsibility.

In order to ensure compliance with the operation and marketing of gambling and the existence of the conditions for a licence, the new Gambling Act would lay down provisions on the diverse powers of the supervisory authority and other means of supervision. With regard to the operation of gambling, a key means of control would be technical control of gambling transactions and player account transactions, which would make it possible, for example, to monitor compliance with player self-exclusion and loss and money transfer limits. In addition, the reliability of gambling systems, draw equipment and draw methods and the randomness of draw results would be ensured by an audit carried out by an external inspection body approved by the supervisory authority.¹⁷

The Act would also lay down the general obligation of licence holders to locate gambling systems and draw equipment in Finland. However, the provision would not imply a requirement for a permanent establishment, but gambling systems and draw equipment could also be located outside Finland, subject to the conditions laid down. In order to ensure compliance with the legislation, the supervisory authority could also, among other things, carry out inspections of the licence holder's premises and information systems. The supervisory authority would have extensive rights to obtain the information necessary for supervision from licence holders.¹⁸

Notification and reporting obligations for exclusive licence holders and gambling licence holders would also be a key part of supervision to ensure that the objectives of the Act are met. The requirement to submit reports and documentation as set out in the draft regulations would, in part, allow the authority to oversee the nationwide operation and marketing of gambling and to evaluate the existence of the conditions necessary for granting a licence.

Economic impact

Economic impact of licensing and supervision activities

The intention is that licences could be applied for from 1 January 2026, when the provisions of the Gambling Act on the licensing procedure enter into force. The licensing system should be in place well in advance of the start of the licensing application process. In Denmark, the average processing time for licences is three to six months, according to current data. In the light of this information, the proposal for a new Gambling Act foresees that the processing of the first licences should be subject to a minimum clearance period of between six and nine months. In the future, the processing time for licences can be expected to be shorter. It is also difficult to predict whether all companies will ap-

¹⁷Government proposal HE 16/2025 vp, p. 98.

¹⁸Government proposal HE 16/2025 vp, p. 99.

ply for gambling licences at the same time and mostly at the beginning of 2026. Gambling software licences would be granted from 2027 onwards.¹⁹

The aim is that the costs of licensing and supervision activities would in future be covered by the licence and supervision fees collected from Veikkaus Oy and licence holders. With the proposed Gambling Act, a maximum of around EUR 10 million could be collected in the form of supervisory fees. The proposed recoverable amount of EUR 10 million is estimated to be sufficient to cover the supervisory authority's foreseeable cost needs in the coming years due to the increase in the number of licences and the development of supervisory tools related to digitalisation. The financial sustainability of the authority needs to be reviewed at regular intervals, e.g. every 5 to 10 years, due to changes in the regulatory environment and the functioning of the supervised entities. It is difficult to estimate the final amount of the impact in euro in advance, as the exact amounts of the supervisory fees do not follow directly from the implementation of the law.²⁰

According to the proposal, the supervisory fee would be a fee of a fiscal nature and would therefore be laid down at the level of an act. The Gambling Act would determine the statutory, possible maximum amount of supervisory fees and their allocation between supervised entities. Meanwhile, the actual amount of the fees actually charged per year would be based on the annual budget established by the supervisory authority. The aim of the regulation would be to make it possible for the supervision fees to cover the actual costs incurred by the supervision.²¹

A technical regulation on the imposition of supervisory fees would specify the content of the information to be provided to the supervisory authority, the means of providing the information and the deadlines. The information to be provided would concern the identity of the licence holder and the gross gaming revenue data.

The supervisory fee should be paid in a single instalment. This would support not only administrative efficiency but also the financial and resource planning of the supervisory authority. A single payment would reduce the workload associated with the management of fees both for the supervisory authority and licence holders. A centralised collection of payments would also ensure that the authority has sufficient financial resources to carry out its control functions within the planned time frame throughout the whole budgetary period.

In addition, the single-instalment system would aim at clarifying the payment system and reducing the risks associated with the management of potential defaults. A one-off payment would give the operator a predictable and clearly budgeted cost, which could also facilitate the company's internal financial planning.

A supervisory fee payable in a single instalment may impose a proportionately higher burden on small and medium-sized entities that may not have access to a large liquidity

¹⁹Government proposal HE 16/2025 vp, p. 115.

²⁰Government proposal HE 16/2025 vp, p. 117.

²¹Government proposal HE 16/2025 vp, p. 117.

buffer, or whose cash flow varies from one period to the next. Especially in the first years of operation or upon entry into the market, a one-time payment may lead to changes in the liquidity of undertakings.

The amount of the processing fees for licence applications would, in turn, be determined annually on the basis of the Act on Criteria for Charges Payable to the State, by a decree and in accordance with the principle of cost recovery.²²

Economic impact on businesses

The proposal would have implications for companies engaged in gambling activities, agent companies selling gambling on their behalf, companies providing gambling software used in the operation of gambling, network operators, companies operating in the media and marketing sector, operators in the event industry, as well as for various players in the sports sector. In addition, the proposal would have an impact on companies active in the equestrian and rural sectors.²³

The proposed regulation would impose an administrative burden and other regulatory compliance costs on licence applicants and licence holders in relation to the fees for processing licence applications, the supervisory fee, tasks related to licensing, reporting and control procedures, inspections of gaming systems, draw equipment and draw methods, and the obligation to submit gambling and player account transactions to the supervisory authority and to retain data for a period of five years. Supervisory and anti-money laundering obligations could also impose administrative burdens and costs on licence holders.²⁴

In preparing the regulations, the supervisory authority has taken into account the administrative burden that the various aspects of the proposed regulation will impose on applicants for and holders of licences and the impact of these obligations in relation to the constraints imposed by the size and resources of operators. As regards the fees for the processing of licence applications, the administrative burden is non-recurring and concerns the initial stage of the application process. In the case of the supervisory fee, the administrative effect is recurring, but the establishment of the fee collection mechanism in practice and the predictability of the information will reduce the administrative burden caused by it.

As regards the obligations relating to the authorisation and reporting procedures, the provisions aim to clarify and standardise the procedures to be followed by operators in order to make the initial administrative burden as predictable as possible and to reduce it as the processes become more established and automated. As regards the obligations to check gaming systems, draw equipment and draw methods, the regulation will entail targeted administrative work, in particular during the approval phase or when systems are modified, but as a general rule, the recurrence of these obligations will be limited, and the impact will diminish over time.

²²Government proposal HE 16/2025 vp, p. 118.

²³ Government proposal HE 16/2025 vp, p. 122.

²⁴ Government proposal HE 16/2025 vp, p. 122.

The various resources of the operators have been taken into account in the preparation of the regulations, and efforts have been made to ensure that the content of the obligations contained in the regulations is clear, uniform and in accordance with the principle of proportionality. This would also allow smaller and medium-sized operators to build up the procedures required by the regulation through reasonable measures without a disproportionate administrative burden.

The assessment of the impact on business presented in the government proposal is based, in particular, on consultations with ministries and authorities, on information from operators engaged in and representing gambling activities, and on experience from key peer countries Sweden and Denmark. During the preparation of the Gambling Act, operators in the gambling sector have pointed out that it is not possible to accurately assess the effects in all respects, as the requirements for companies would be partly regulated by decree-level legislation, and the supervisory authority could issue regulations on, inter alia, the technical conditions for carrying out IT supervision. In this respect, alternative assessments have been included in the business impact assessment, taking into account whether secondary regulation would be consistent with, for example, the regulation of key peer countries.²⁵

Gambling market

Opening up the gambling market to competition will allow new undertakings to enter the market and is likely to lead to a significant increase in the number of operators on the market. By looking at Sweden and Denmark, and taking into account the content of the proposed regulation, it can be considered likely that several dozen gambling companies will apply for a licence in Finland. Based on the experiences of Sweden and Denmark, it is expected that both large, international listed companies and medium-sized and smaller, local operators will enter the market. Smaller operators, primarily located in Malta and Estonia, are expected to seek a licence in Finland if they consider the business environment to be favourable. The companies applying for a licence are likely to be largely the same as those currently operating in the Swedish and Danish markets. This assumption is supported by the fact that a significant portion of gambling outside the system in Finland is currently directed at operators licensed in Sweden and/or Denmark. As regards horse-based betting, it can be assumed that there would be a limited number of players entering the market, which would correspond to the situation in Sweden and Denmark.²⁶

From the point of view of the supervisory authority, the potential multiplication of the number of new entrants into the market compared to the current situation requires that the scalability of the licence application process be ensured. The regulations thus seek to ensure an effective and equal assessment of licence applications at an early stage of market opening. In the supervisory authority's regulations, attention has been paid to the use of structured information.

²⁵ Government proposal HE 16/2025 vp, p. 123.

²⁶ Government proposal HE 16/2025 vp, p. 123.

As a result of the grant of a gambling licence, other start-up companies will have to adjust their activities to a certain extent in terms of their marketing and the forms of gambling offered. On the other hand, gambling forms that remain subject to an exclusive licence and combination games that contain features of gambling forms subject to a gambling licence and of games subject to an exclusive licence should be removed from the offer in mainland Finland. Meanwhile, applicants for a gambling software licence would be required to adapt their offerings to the proposed regulation, including electronic slot machine games and their spin rate, bet placement mechanism, bet size, bonus features and other game features. It would also be possible that gambling software licence holders would have to remove games from their offer in Finland. It is not yet possible to assess the impacts in more detail, as the impacts depend in part on future decree-level regulation.²⁷

The regulation under the proposed Gambling Act includes administrative measures such as the reporting obligation and the obligation to establish different procedures for the operation of gambling that are binding on gambling companies and identical in content and scope to all licence holders operating gambling, regardless of the number of their staff or the size of their turnover.²⁸ The technical regulations of the supervisory authority define the information necessary to fulfil the reporting obligation, the format of the information and the frequency of the reporting, which would be a financial year. The regulations would oblige licence holders to document and maintain internal guidelines and operational processes concerning, among other things, the prevention of minors' gambling, the prevention of the harm from gambling, customer due diligence and compliance with the principles of financial responsibility.

Uniform requirements for operators of all sizes are justified from a regulatory point of view by the content and impact of the activities concerned. For this reason, the supervisory authority has not considered it appropriate to impose a differentiated level of requirements on smaller operators, but has sought to allow for scalability and administrative simplification through harmonised approaches. This has been done with a view to ensuring a fair regulatory focus and preserving the integrity of the gambling system for all categories of operators.

The obligations on gambling companies to provide gaming and player data to the supervisory authority via a technical interface and the integration of gambling companies' gaming systems with the self-exclusion system, in turn, have a direct economic impact on the companies. The cost is estimated to be at least several tens of thousands of euro, regardless of the size and turnover of the gambling company. The costs of building the interface and integrating with the self-exclusion register are necessary steps to enter the licensing system, and the relatively high IT costs can be estimated to be a proportionately greater burden on smaller companies. High costs may even result in some small companies not seeking a licence at all. Therefore, it can be assumed that the regulation will, to some extent, favour larger companies and companies that already have the information systems and other necessary technologies required by the proposed regulation.

²⁷ Government proposal HE 16/2025 vp, p. 124.

²⁸ Government proposal HE 16/2025 vp, p. 125.

On the other hand, the new Gambling Act provides for the scaling of the amount of the supervisory fees to be paid by gambling companies, so that the supervision fee is higher for operators with a higher margin. This, in turn, will have a favourable effect on smaller companies, which may encourage smaller companies to seek a licence.²⁹

Economic impact on Veikkaus Oy

The proposed regulation would impose some regulatory burden, i.e. an administrative burden and other compliance costs, on Veikkaus Oy. The regulation would mean that Veikkaus Oy would have to apply for and obtain the necessary licences from the competent supervisory authority in order to continue the operation of gambling covered by the exclusive right. This would result in increased administrative work and costs for Veikkaus Oy compared to the current situation in which Veikkaus Oy's exclusive right is based on the Lotteries Act. However, because Veikkaus Oy will also have to apply for licences for its operations covered by the licensing system under the new system, the additional work caused to the company by applying for exclusive licences is not estimated to be significant.³⁰ The supervisory authority's regulations would lay down requirements for the form and content of exclusive rights applications and reporting that would be consistent with those concerning other licences in order to ensure a systematic and predictable management of the obligations.

Veikkaus Oy would also incur an administrative burden from its reporting and information provision obligations under the proposed Gambling Act. Regulatory compliance costs would arise from the fees for processing licence applications and supervisory fees. In addition, compliance costs would be incurred, for example, for the assessment of gambling systems, draw equipment and draw methods by an inspection body, technical monitoring of gambling events and player account transactions, and a centralised self-exclusion register, which would require the company to make changes to its information systems.³¹ The administrative burden related to the reporting obligations can be estimated to decrease over time once the reporting becomes stable, and the initial costs related to the deployment of the systems are covered. In addition, possible phased transition periods for the new gambling system could ease the initial investment pressure and facilitate the timing of implementation.

Since the grant of an exclusive licence would be based on an administrative decision taken by a gambling authority, the new regulation would also entail a risk, in principle, that the decision in question would be challenged before the competent court. Any appeal proceedings against the authorities' decisions to grant an exclusive licence may therefore pose a risk to the continuity of the gambling activities carried out by Veikkaus Oy under the exclusive right in a situation in which, following an appeal brought before it, the appellate court considers that the decision to grant the licence was unlawful in some respect and annuls that decision. However, when the conditions for granting a licence

²⁹ Government proposal HE 16/2025 vp, p. 126.

³⁰ Government proposal HE 16/2025 vp, p. 126.

³¹ Government proposal HE 16/2025 vp, p. 127.

are specified in legislation and when only a company controlled by the state, i.e. in practice a company belonging to the Veikkaus Group, could be granted an exclusive licence by law, the risks associated with such appeal processes appear to be minor in ex ante assessment, also taking into account the provisions on the right to appeal laid down in section 7 of the Administrative Judicial Procedure Act (808/2019).³²

The proposed regulation on the gambling software licence would also have implications for Veikkaus Oy as a licence holder under the Gambling Act. Licence holders would be allowed to use only the gambling software supplied by the gambling software licence holders for the gambling games they operate. This would impose a certain regulatory burden on licence holders. The regulation of the gambling software licence may, to some extent, limit the possibilities of choosing a gambling software provider. However, it can be considered very likely that almost every major gambling software provider will apply for a gambling software licence in Finland. The holder of an exclusive and gambling licence should also contribute to ensuring that their gambling software provider applies for the licence required by the Gambling Act.³³

The gambling software provider would be responsible for applying for the licence itself, for the costs incurred and for the supervision fee imposed on the gambling software licence. However, it is likely that software suppliers would pass on the financial burdens they face to their exclusive and gambling licence holder partners in the form of fees and commissions to be set out in mutual agreements. Thus, the regulation of gambling software providers would also affect the assessment of potential licence applicants as to the profitability of their activities on the market and their willingness to seek a licence. If the conditions for the validity of the gambling software licence were no longer met during the licence period, and the supervisory authority revoked the gambling software licence, the holder of the exclusive or gambling licence should change the gambling software provider. With regard to gambling software licences, the proposed transitional period would mean that Veikkaus Oy, after possibly obtaining an exclusive gaming licence, would be able to operate games of chance using gambling software that does not yet have a gambling software licence at the start of gambling activities under the new Gambling Act.³⁴

According to Veikkaus Oy, the proposed regulation could create uncertainty as to the continuity of business and cost risks for the business of a holder of an exclusive right or gambling licence, since the company has no certainty whether the software supplier will apply for the necessary licence, or whether it will receive the licence applied for. A similar degree of uncertainty would also be associated with the activities of other gambling licence holders.

The proposed transitional provisions of the Gambling Act would make it possible to apply for a licence for gambling software well in advance of the application of the gambling software licence requirement, which would allow, where appropriate, a change of

³²Government proposal HE 16/2025 vp, p. 128.

³³Government proposal HE 16/2025 vp, p. 128.

³⁴Government proposal HE 16/2025 vp, p. 128–129.

provider of gambling software if the provider did not apply for or were not granted a gambling software licence.

Economic impact on other undertakings and operators engaged in gambling activities

The effects of the introduction of the licensing system on other gambling operators is difficult to assess accurately in advance. The effects will primarily depend on the impact of the reform on the size and channelling rate of the market and the position Veikkaus Oy will gain in the market. The size of the licence holder, the markets in which the company is already licensed and how the existing regulatory frameworks in these countries compare with the proposed regulation will have a significant impact on how the new regime will affect individual operators. In principle, however, it can be estimated that the reform will benefit a number of companies engaged in gambling activities, and in particular companies of a larger size.³⁵

When making a decision on establishment, companies assess whether it is possible for them to achieve a higher income by obtaining a licence or by opting out of the market, taking into account the costs of establishment (including taxes levied), and the extent to which the demand towards the company increases compared to opting out.³⁶

The proposed regulation would impose a regulatory burden, i.e. an administrative burden and other compliance costs. Entering the Finnish market will incur certain costs related to purely Finnish operations, such as marketing targeted at Finland, administrative fees and taxes, but since a significant part of the costs in the gambling market are fixed, a large part of the companies' Finnish gross gaming revenue could be retained by the companies as profit.³⁷

The licensing procedure and the supervision of the operation of gambling would entail some administrative costs for licence applicants and licence holders. The licensing procedure requires applicants to submit statements and register extracts. In terms of supervision, administrative costs arise from, among other things, the production and provision of information by licence holders to the authorities on their activities, as required by the proposed regulation. The administrative costs are not estimated to be significant, taking into account, inter alia, that the applicant entities can be expected to have in many respects pre-existing administrative procedures, as similar statements and reports are also required in many other countries where several potential applicant companies operate.³⁸

The extent of the reporting burden on companies depends in particular on whether the necessary information is already available and stored. For example, if the reporting of gambling were to require information that is not already collected, this would be a technically significant change. It can be estimated that smaller and medium-sized enterprises,

³⁵ Government proposal HE 16/2025 vp, p. 129.

³⁶ Government proposal HE 16/2025 vp, p. 129.

³⁷ Government proposal HE 16/2025 vp, p. 130.

³⁸ Government proposal HE 16/2025 vp, p. 130.

which are not already active on several regulated markets, will be disproportionately affected by the administrative burden.³⁹

There would be regulatory compliance costs for licence applicants and licence holders from the licence application processing fees and the supervision fee. In addition, compliance costs would be incurred, for example, for the assessment of gambling systems, draw equipment and draw methods by an inspection body, technical monitoring of gambling events and player account transactions, and a centralised self-exclusion register, which would require licence holders to make changes to their information systems.⁴⁰

The working time of licence applicants and licence holders can be estimated as significantly spent on tasks related to licensing, reporting and control procedures. According to a representative from the gambling sector, the total workload can be roughly estimated to be up to around 50 FTE years. According to another representative of the gambling industry, the administrative costs arising from those obligations can be regarded as manageable. The tasks would include legal and technical compliance, anti-money laundering, responsible gambling, data protection, customer service and data processing inputs. The amount of working time required varies according to the frequency and scope of the tasks to be performed, the clarity and concreteness of the instructions and the reasonableness of the deadline. According to the assessment of a representative of the gambling industry, the proposed regulation does not require the introduction of new external services in addition to those currently in use. It would take about three months of work to obtain and prepare the documents related to the licence application.⁴¹

Although most of the costs are related to administrative tasks, the regulation could in some cases also require the use of outsourced services to complement existing tasks. The need for purchasing services varies according to the size of the licence holder, and their cost is estimated to be in the range of EUR 30 000 to EUR 50 000. Translation and legal services would, according to the industry's assessment, represent a significant administrative cost for companies.⁴² It is possible that in some cases, licence holders should hire or acquire Finnish-speaking compliance expertise to handle the licensing, reporting and supervisory procedures. Gambling operators estimate that the compliance function would require at least one FTE year of work, depending on the content and volume of reporting required.⁴³

As regards the processing language, the provisions of the Finnish Language Act (423/2003), pursuant to which a licence application may be processed by the supervisory authority in Finnish or Swedish, have been taken into account in the preparation of the regulations. The provisions specify that the provision of information and documents would be possible not only in Finnish but also in Swedish. The aim of the provisions is to ensure that access is possible in both Finnish national languages without imposing an excessive additional burden.

³⁹Government proposal HE 16/2025 vp, p. 131.

⁴⁰Government proposal HE 16/2025 vp, p. 131.

⁴¹Government proposal HE 16/2025 vp, p. 131.

⁴²Government proposal HE 16/2025 vp, p. 131.

⁴³Government proposal HE 16/2025 vp, p. 131.

The costs of the inspection of gaming systems, draw equipment and draw methods proposed to be laid down in section 44 of the Gambling Act depend on the minimum scope of the inspections. The minimum scope of the inspections will be laid down in the technical regulations of the supervisory authority. In assessing the minimum scope, the supervisory authority has taken into account the fact that audits are carried out on the basis of sector-specific standards, and that more extensive audits may be carried out by licence holders if they so wish. The technical regulations have also made it possible to use existing certificates as part of the audit. Enabling this procedure has been designed to avoid the duplication of work and to reduce costs.

According to the government proposal, in Sweden, the cost of a large audit for the operator has been at least EUR 150 000. In Sweden, about 25–30 audit requests are made each year to different licence holders. The costs of the certification of a gaming platform would be divided into two parts and two sub-parts: the first certification would require more than 250 hours of internal work by the licence holder, and the external audit costs would be estimated at around EUR 12 000 to EUR 20 000. For subsequent audits, it is estimated that the internal working hours would be between 30 and 50 hours per audit, and the external audit costs would be around EUR 5 000.⁴⁴

Inspections would always require the use of outsourced services. It is difficult to assess the exact impact, as the audit work has not yet been carried out, and the specificity of the sector makes it difficult to compare the audits with those of other sectors. The main change in the information system for gambling companies would result from the proposed obligation under section 45 of the Gambling Act to submit gambling and player account transactions to the supervisory authority unchanged and within a reasonable period of time and to retain data for a period of five years. The requirement would oblige gambling companies to build a data storage system, separate from their gaming system, to store gambling and player account transactions, and an interface between that system and the supervisory authority's control system to transfer data. Another IT implementation method could be to transfer gambling and player account transactions directly from the gambling companies' gaming systems to the supervisory authority's control system via an interface if it was possible to ensure the necessary time to store the data by means other than a separate data storage system. The certificate used to ensure the integrity of the information provided could be a certificate managed and made available to companies by the authority, in which case gambling companies should integrate the certificate into their own data storage system. Otherwise, the authority would define the technical requirements for the certificate to be used by gambling companies, but gambling companies could choose from a number of different certificates to use the one that meets the requirements defined by the authority. The supervisory authority already has a certificate in place in the current gambling system, which is likely to be suitable for use in the new gambling system as well.⁴⁵

Accurately quantifying technical compliance costs in a single market is challenging, as these costs are spread across the business as a whole. However, the implementation of

⁴⁴Government proposal HE 16/2025 vp, p. 131.

⁴⁵Government proposal HE 16/2025 vp, p. 131–132.

the technical interface and the fulfilment of the related IT security requirements may be considered a significant investment for licence applicants. The content, implementation schedule and costs of information system reforms depend significantly on the company's information system architecture. The costs and schedule of implementation are also influenced by the size of the company, the markets in which the company is already licensed, and how the regulatory frameworks of these markets compare with Finnish regulations. According to information received from the Finnish Gambling Association ry, the Gambling Industry Association Finland and the gambling operator Paf, several licence applicants and licence holders have information systems that, as such or developed further, would also be available in Finland. However, it may be necessary to adapt the information systems to technical requirements, which may require several FTE years of effort. A rough estimate of the cost of setting up a data storage system, built by the company itself, is around EUR 30 000 to EUR 50 000. If the work is commissioned from outside, it is estimated that the costs will increase. In addition, there are the monthly costs of maintaining the data storage system, which, according to preliminary estimates from peer countries and gambling companies, would be at least around EUR 2 000 per month. Monthly costs could increase up to several tens of thousands of euro per month, depending on the number of active customers in the company. For example, the cost of a data storage system for a gambling company in the Netherlands with 100 000 active customers was around EUR 30 000 per month. An active customer means a customer who has played, deposited or withdrawn money from their player account during the month in question. According to other estimates on the costs of setting up a data storage system, the total cost of the project is estimated to be approximately EUR 110 000. According to these estimates, around EUR 50 000 should be reserved for development, at least EUR 10 000 for maintenance costs, EUR 30 000 for staff costs, and EUR 20 000 for consultancy costs. The preparation time for information system changes and other technical changes is estimated to take at least 6 to 12 months, depending on the scope and requirements of the changes. According to the assessment of one representative of the gambling industry, the necessary changes could be implemented before the entry into force of the Act.⁴⁶

The implementation of the obligations under the duty of care can be assessed as entailing costs and the need to use purchased services, in particular for smaller licence holders.⁴⁷ However, the supervisory authority's regulations are not considered to be excessive, given the nature and scale of the gambling activity. Measures relating to the duty of care are necessary from the point of view of player safety, and the prevention and reduction of gambling harm and abuse.

The resources used to prepare marketing reports and notifications to the supervisory authority may represent an administrative burden for businesses. These are one-off costs, mainly related to the company's labour costs. The administrative burden is proportionately higher the smaller the company. The majority of licence applicants would have to adapt their marketing strategy to some extent, as certain marketing channels would be prohibited compared to some other markets. On the other hand, marketing through tradi-

⁴⁶Government proposal HE 16/2025 vp, p. 132.

⁴⁷ HE 16/2025 vp, p. 133.

tional media would provide a new channel for some operators, which would require adaptation, strategic changes and an understanding of the new regulation. Some businesses applying for a licence might need to buy in expert services to support their interpretation of marketing regulation. In addition, the obligations related to supervision and anti-money laundering could impose some administrative burden and costs on licence holders.⁴⁸

Economic impact on gambling software providers

According to the proposal, the supply of gambling software used in the operation of gambling would require a gambling software licence. Holders of a gambling software licence should not supply gambling software to gambling operators that operate or market gambling unlawfully without a licence. The proposed regulation would therefore have an impact on gambling software providers.⁴⁹

However, the proposed procedure for applying for a gambling software licence would be very light compared to the procedure for other licences. The reporting obligations imposed on the applicant for a gambling software licence are significantly lighter than those imposed on applicants for an exclusive licence and a gambling licence, and the law would also not provide for a regular reporting obligation. In addition, the supervisory fee would entail some additional costs for gambling software licence holders, but the amount of the fee would be significantly lower than the supervisory fees for gambling and exclusive licence holders.⁵⁰

Although the proposed regulation would impose a certain degree of regulatory burden on gambling software providers, it would also contribute to creating equal conditions of competition in the gambling software market. The Finnish Gambling Association ry estimates that most large gambling software suppliers have staff to handle the application process for a licence. It is estimated that it will take two to three working days to complete the application, and that approximately one working day per month will be used for monitoring. The licensing application process itself would not require the recruitment of additional staff.⁵¹

Effects on the authorities

Impact on the licensing and supervisory authority

With the proposed reform of the gambling system, the duties of the authorities would change significantly compared to the current regulation, especially with regard to the duties of the licensing and supervisory authority. New tasks would include tasks related to

⁴⁸Government proposal HE 16/2025 vp, p. 133.

⁴⁹Government proposal HE 16/2025 vp, p. 134.

⁵⁰Government proposal HE 16/2025 vp, p. 134.

⁵¹Government proposal HE 16/2025 vp, p. 135.

the processing of applications for exclusive rights, gambling and software licences, as well as a number of supervisory tasks. According to the proposal, the Finnish Supervisory Agency under the new Gambling Act would be the Finnish Supervisory Agency. During the transitional period, the National Police Board would handle the tasks of the authority.⁵²

Under the proposed regulatory framework for gambling, the costs of the supervisory authority's licensing and supervisory tasks should in future be fully covered by licensing and supervisory fees. The amount of the licence application fees would be determined in accordance with the principle of cost recovery, and the fees would be regulated in the transitional phase in 2026 by an annual decree of the Ministry of the Interior on the fees for police services and, when the tasks of the authority were transferred to the Finnish Supervisory Agency, by a government decree on the fees for the services of the new agency.⁵³

The increase in the number of companies entering the market would have a significant impact on the number of tasks of the authority. Tasks are expected to increase significantly. New administrative tasks would include, in particular, tasks related to the processing of exclusive, gambling and gambling software licence applications and several supervisory tasks. The supervisory authority should also, as part of its supervision, approve the inspection bodies that assess the reliability and randomness of gaming systems, draw equipment and draw methods used in the operation of gambling and, if necessary, order additional inspections of gaming systems, draw equipment and draw methods. In addition, information and advice to licence holders can be expected to increase considerably from the current level.⁵⁴

A large number of licence applicants are likely to be gambling companies established abroad, which is estimated to have an impact on the nature of licensing and supervision tasks. The fact that Veikkaus Oy's exclusive right would be based on a licence would increase the workload of the competent authority to some extent compared to the situation in which the exclusive right is statutory, as under the current Lotteries Act.⁵⁵

As a result of the proposal, the supervisory authority's tasks regarding IT monitoring would also change, as IT monitoring would no longer apply solely to Veikkaus Oy, but also to the operation of gambling by all licence holders. The IT monitoring of licensed gambling activities would be different in nature from the supervision of Veikkaus Oy's exclusive rights activities currently carried out under the Lotteries Act. In the gambling system under the proposed regulation, licence holders would have to make part of the game data available to the authority via a direct interface, but it would be possible to do so with a much longer delay, contrary to the current situation. In addition, in the future, the technical measures of the supervisory authority would only concern the utilisation of game data by licence holders for the purpose of supervising gambling operations. This means that, unlike now, the supervisory authority would no longer be involved in any as-

⁵²Government proposal HE 16/2025 vp, p. 142–143.

⁵³Government proposal HE 16/2025 vp, p. 142.

⁵⁴Government proposal HE 16/2025 vp, p. 143.

⁵⁵Government proposal HE 16/2025 vp, p. 143.

pect of the operation of gambling, such as the randomisation of draw results or the confirmation of winnings.⁵⁶

The objective of the separate implementation project, set up by the Ministry of Finance in October 2024, is to ensure and implement the orderly transfer of licensing and supervision tasks, the personnel responsible for them and information systems from the National Police Board to the new Licensing and Supervision Authority to be established. One of the tasks of the project is to draw up a more detailed project plan for the organisation and transfer of licensing and supervisory tasks to the competent authority, to plan and submit, in addition to a temporary operating model, a proposal for the organisational structure of the operating unit for licensing and supervisory activities, and to draw up a plan for the location of the function in the receiving organisation. In addition, the task of the project is to prepare functions and information systems compatible with the new Finnish Supervisory Agency and related procurements. New information systems would be developed for the National Police Board. As the ownership of the systems will be transferred to the new Finnish Supervisory Agency after the transitional period lasting until the end of 2026, the framework conditions related to the enterprise architecture of the new agency will be taken into account in the implementation.⁵⁷

Risk assessment of the implementation of the reform

General

This is a very extensive change overall, as it is a comprehensive reform of the gambling system. When assessing the risks related to practical implementation, the most significant risk, and thus a factor affecting the entire reform, is the exceptionally tight preparation and implementation schedule for the comprehensive reform. In an ideal scenario, adequate time should be reserved for the overall reform and its implementation, encompassing its many subcomponents. The reform, which is implemented in an exceptionally short time frame, entails significant risks, the most important of which have been identified as risks to information systems and personnel.⁵⁸

Information system changes entail significant risks that may impact both the service experience of administrative clients and the execution of the authorities' duties. The main risks relate to delays, technical problems, interdependencies between different systems and lack of clarity in responsibilities and coordination. The most critical part of the implementation is the creation of the system necessary for IT monitoring. This includes the system for granting licences and the construction of a centralised self-exclusion register.⁵⁹

⁵⁶Government proposal HE 16/2025 vp, p. 143.

⁵⁷Government proposal HE 16/2025 vp, p. 144.

⁵⁸Government proposal HE 16/2025 vp, p. 144–145.

⁵⁹Government proposal HE 16/2025 vp, p. 145.

Delays in IT systems could have a significant negative impact on implementation. From the point of view of administrative clients, the availability and functionality of services could deteriorate, which often leads to dissatisfaction. For the public authorities, delays can hamper the performance of fundamental tasks such as timely decision-making and information management.⁶⁰

If, for example, the licensing and supervisory authority did not have the necessary staff or the information management and other systems required for its operations, the authority could not in practice grant licences or supervise gambling activities, in which case gambling activities under the new gambling system could not start. If licences could not be granted due to the lack of information systems or personnel, Veikkaus Oy and other gambling operators would not be able to start their gambling operations within the desired time frame.⁶¹

A new licensing and supervision function is being implemented and implementation is being prepared in a situation in which gambling legislation has not been adopted. Thus, any procurement to facilitate implementation is made with the risk of legislative change, delay, postponement or even cancellation, although the risk of the latter is estimated to be very low. However, in the preparation of the information systems required for licensing and supervision activities and other procurements, frontloading in relation to the adoption of legislation must be taken into account. As such, implementation may entail additional and higher costs than when planning and preparing for the implementation of legislation that has already been adopted and is also clear in terms of entry into force.⁶²

Risks and risk management related to the transfer of licensing and supervision to the Finnish Supervisory Agency at the beginning of 2027

The transfer of tasks from the National Police Board to the new Finnish Supervisory Agency constitutes a discontinuity in operations and thus potential risks for the continuity of operations.

In addition to the development of the licensing and supervisory system, information system solutions must address issues related to the adaptation of the new gambling activity and its specific licensing and control system to the overall architecture of the new Finnish Supervisory Agency, as well as the transfer of its maintenance and development activities to the new authority. As the system does not actually exist at present, a more detailed assessment is not yet possible. On the other hand, when the transfer is known, the framework conditions constituted by the operation and structure of the Finnish Supervisory Agency may be taken into account in the construction of the system. In this way, it may be possible to manage coordination and integration risks even better compared to the existing system. It is also important to ensure that the transfer of gambling licensing and supervision activities and staff to the new agency is as smooth as possible. Ensure,

⁶⁰Government proposal HE 16/2025 vp, p. 145.

⁶¹Government proposal HE 16/2025 vp, p. 146.

⁶²Government proposal HE 16/2025 vp, p. 146.

inter alia, the functionality of various cross-functional systems, such as communication solutions, financial and human resources management systems, the transfer of key information and pending cases, the organisation of information management and the integration of activities into the administrative systems of the Finnish Supervisory Agency, including case management.⁶³

The transfer of pending cases and archives is a key condition from the point of view of continuity in the performance of official duties. The smooth transfer of pending cases and archives necessary for the performance of the tasks from one organisation to another can be legally resolved by transitional provisions, but the transfer also requires preparatory measures to be taken by the transferring organisation. For the implementation of the transfer, it is necessary to transfer pending cases and to evaluate the archives necessary for the tasks and prepare their transfer carefully. There may be a risk, for example, that electronic archives will not be transferred to the Finnish Supervisory Agency if there are compatibility problems with the case management and archive systems used by the agencies.⁶⁴

Another risk is also created by the fact that the Finnish Supervisory Agency will not become fully operational as a new agency and accounting unit until the beginning of 2026. While the agency is a new multi-location organisation with approximately 2 000 employees and 20 offices, integrating functions, operating cultures and operating methods from a total of 21 existing agencies (National Supervisory Authority for Welfare and Health (Valvira), six Regional State Administrative Agencies, 13 Centres for Economic Development, Transport and the Environment (ELY Centres) and the KEHA Centre), it will have functioned for a maximum of one year before being given the task of supervising gambling activities. The Finnish Supervisory Agency will therefore not be in a very stable organisational state when it takes up its duties, but will still be going through its previous very extensive process of consolidation and change, its practical implementation and completion, and the process of building a single, coherent organisational and operational culture for the new agency. On the other hand, the risk may be reduced by the fact that the management of the Finnish Supervisory Agency has relevant experience in the consolidation and modification processes involved in the reform, which may be beneficial from the perspective of the implementation of the transfer of the gambling system.⁶⁵

In summary, the transfer and adaptation of new tasks to an organisation that is still implementing and undergoing the previous change inevitably poses risks that are difficult to foresee.⁶⁶

⁶³Government proposal HE 16/2025 vp, p. 146-147.

⁶⁴Government proposal HE 16/2025 vp, p. 147.

⁶⁵Government proposal HE 16/2025 vp, p. 147.

⁶⁶Government proposal HE 16/2025 vp, p. 147.

The National Police Board
Gambling Administration
Konepajankatu 2, PL 50, 11101 Riihimäki
Telephone +358 295 480 181, poliisi.fi