Activity Report 2024

Gemeinsame Glücksspielbehörde der Länder
Anstalt des öffentlichen Rechts

Gambling needs rules

Public gambling in Germany is subject to approval by the relevant authorities. Operating or brokering gambling without approval is illegal and a criminal offence. Advertising illegal gambling is also prohibited. The 16 federal states have entrusted the Gambling Authority of the Federal States of Germany (Gemeinsame Glücksspielbehörde der Länder (GGL)) with the regulation of cross-federal state gambling activities, particularly on the internet. The authority was established on July 1st, 2021, as an institution under public law on the basis of the State Treaty on Gambling 2021 (GlüStV 2021). Its headquarter is in Halle (Saale).

In the following, the authority will be referred to as GGL.

Introduction

The primary role of the GGL is to regulate the German online gambling market by reviewing and authorising cross-federal state gambling activities on the internet and ensuring that gambling operators holding a gambling permit (in the following referred to as approved operators) are in compliance with the provisions of the GlüStV 2021. The GGL also takes measures against illegal gambling on the Internet.

The authority ensures that the equally important objectives of § 1 GlüStV 2021 are adhered to, e.g. ensuring the protection of minors and players, preventing compulsive gambling and betting addiction, and preventing risks to the integrity of sporting competitions.

The GGL publishes a report on its work once a year. This explains the basic approach of the authority and reviews the measures and successes of the previous financial year. A key component of this report is the analysis of market developments, covering figures and trends in the German gambling market, especially online.

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Foreword by Reiner Moser

Head of the Ministry of the Interior, Digitalisation and Municipalities of Baden-Württemberg, Chairman of the Administrative Board of the GGL from 01.07.2024 – 30.06.2025

The online gambling market has undergone rapid development in recent years. This does, of course, also have a direct impact on the activities of the gambling supervisory authority. The board and staff of the GGL have successfully responded to the new challenges with great commitment.

The GGL has arrived squarely in the midst of operational activities and is mastering them excellently – despite the many hurdles posed by this complex field of activity – thanks to the dedication of its staff. The prevailing legal precedent broadly confirms the procedures and consequently the approach of the GGL.

The use of payment blocking, for example, has enabled the GGL to prevent deposits and withdrawals in numerous cases, effectively forcing well-known illegal operators out of the market. The first public warnings were issued in 2024, expanding the GGL's supervisory tools to operators holding a gambling permit and thereby encouraging all approved operators to commit to complying with legal and regulatory requirements.

This has enabled the GGL to establish itself as a reliable institution not only in terms of regulating and monitoring the gambling market, but also in terms of cooperation between the states. I would like to express my sincere thanks to the entire GGL workforce on behalf of the Administrative Board for the trusting and consistently results-oriented exchange with both the Executive Board and the employees.

The GGL has not only already achieved a great deal, but also has big plans for the future. It will continue to intensively monitor the process of evaluating the GlüStV 2021 by the states. In this regard, the GGL has commissioned studies on player protection, advertising, as well as the investigation of the black market and the channelling of online gambling, which will provide valuable insights that will be incorporated into the evaluation process. There are also plans for stronger international networking and further digitisation of work processes.

The GGL's goal of creating common cross-provider research standards for the early detection of gambling addiction is worthy of special mention. These so-called "markers of harm", as characteristics that indicate riskier or harmful gambling behaviour, can help to identify problematic gambling at an early(ier) stage. There is currently still no common framework for these risk factors in Germany. Coming up with a recognised list of indicative behaviours like this would be a first for the EU and would really help improve how we protect players.

I wish the GGL all the best in tackling these and other challenges and I am confident that, given the outstanding commitment shown by this authority, it will achieve further important successes in combating illegal gambling and regulating approved gambling.

Reiner Moser

About the Administrative Board

The gambling supervisory authorities of the federal states are working together in the GGL to ensure compliance with the rules of the GlüStV 2021 with a view to effective enforcement and the prevention of gambling addiction, while at the same time channelling the population's desire to gamble into regulated and monitored channels.

This is why the 16 states have set up a GGL Administrative Board. The Administrative Board is the supervisory and steering body of the GGL. It is made up of one chief administrative officer/state secretary/state councillor from each of the ministries responsible for gambling supervision in the 16 participating federal states.

The Administrative Board is chaired by a participating federal state (chairing state).

The chair of the Administrative Board rotates annually on July 1st in alphabetical order of the participating states.

Foreword by Ronald Benter

The year 2024 was characterised by the further development of our role as a regulatory authority, both in the supervision of legal providers and in the fight against illegal gambling activities. We have established ourselves as a reliable and authoritative institution, making a significant contribution to the regulation of the online gambling market in Germany.

One of the objectives of the GlüStV 2021 is to subject the formerly unregulated gambling market to state control and supervision to the greatest extent possible. Our measures are designed to achieve this objective in two key areas:

Firstly, we have achieved tangible success by taking consistent action against the illegal market. Numerous illegal offers were removed, as well as advertising for illegal providers was significantly restricted thanks to Google's advertising guidelines, which were revised at our initiative. Our strategy focuses on making the business model of illegal gambling unattractive over the long term.

On the other hand, our rigorous and systematic monitoring of approved operators has helped to ensure that they act in accordance with the law and that any infringements are consistently punished. A sufficiently attractive legal market is essential for successful channelling. Our experience to date suggests that this has been widely successful. We processed a total of 230 permits and amendment applications and oversaw 141 operators and brokers in 2024. Intensified monitoring of the legal sports betting market - particularly during the European Football Championship and the Olympic Games - was one of the focal points.

Another positive development was the judicial confirmation of the way we are proceeding in numerous proceedings. This strengthens what we can achieve in the coming years. It was also important for us to take a clear position on issues such as the planned reform of the German Criminal Code and to initiate the necessary political dialogue in a targeted manner- with success. We also followed the evaluation process of the GlüStV 2021 by the federal states intensively.

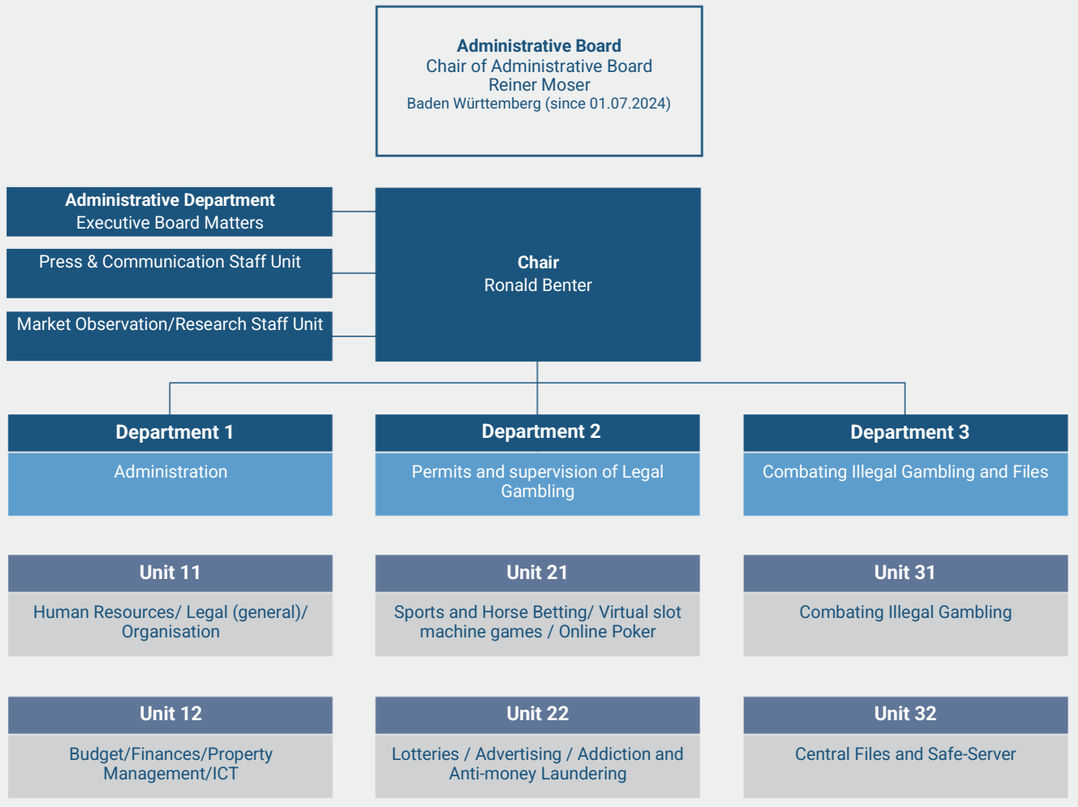
The challenges remain considerable: Increasing digitalisation is constantly giving rise to new opportunities for providers, but also for us as a regulatory authority. It is our duty to continuously review and, if necessary, adapt our approach in order to do justice to these developments. Our objective remains to remove illegal offers from the market and to ensure that licenced gambling operators and brokers comply with the rules to protect players from gambling addiction and manipulation.

This activity report provides you with a comprehensive insight into our work in 2024, including the measures taken and the successes we have achieved. You will also find a detailed analysis of the German gambling market with valuable insights into its structure and development.

I wish you an insightful read!

Chair of the GGL
since 01.07.2021

Organisational structure of the GGL



Our mission

Gambling supervision
We ensure that approved gambling operators comply with the rules aimed at protecting players against gambling addiction and manipulation. We also monitor the approved operators through the LUGAS gambling supervision system.

Combating illegal gambling
We combat illegal gambling, especially online, and take action to prevent risks to the integrity of sporting competition when organising and brokering sports betting.

Permitting
We review and authorise cross-federal state gambling activities.

Market observation/ research
We monitor trends in the gambling market so that we can actively respond to new phenomena or unfavourable developments and advise politicians and associations. This is why we also support scientific research.

Uniform case law
We ensure the uniform application and enforcement of the law, primarily for online gambling in accordance with GlüStV 2021, and enable gambling operators and brokers to operate under the same uniform framework conditions.

Central point of contact
We are the central point of contact and coordination centre covering all interest groups (politicians, players, gambling operators, addiction and prevention associations) when it comes to questions about gambling.

1 2024 at a glance

GGL 2024 in numbers

459 illegal websites that could no longer be accessed from Germany due to prohibition orders

657 **illegal websites that could no longer be accessed from Germany due to network blocking orders**

231 prohibition proceedings initiated for illegal gambling and the advertising thereof

1788 **inspected websites of illegal gambling operators and advertisers**

257 court proceedings conducted in which GGL is listed as a defendant

165 Illegal gambling sites where payment via conventional payment service providers was blocked (payment blocking).

6.1 **million** registered players in the LUGAS central files

230 applications for basic gambling permits/change requests and **approx. 15,000** individual games checked

Highlights 2024

Januar

Februar

Interim report on evaluation of GlüStV 2021 available

The interim report on the evaluation of the GlüStV 2021 measures is available and is expected before the final evaluation in 2026 to highlight the need for political action. The cross-federal state working group, which includes the GGL, has drawn up the report, which is now being discussed by the federal states.

Marc

Evaluation study expert group

An independent panel of experts supervises the study: “Gambling advertising on television and the internet in the field of channelling and addiction prevention” to ensure that the scientific discourse is comprehensively represented. The GGL Executive Board was able to recruit renowned scientists and experts to take on this task.

April

May

GGL warns against illegal online sports betting during the 2024 UEFA European Football Championship

Authority calls for amendments to the Criminal Code to ensure the effective criminal prosecution of illegal gambling activities.

June

More intensive monitoring of the sports betting market during the 2024 UEFA European Football Championship

GGL is part of the task force of the Group of Copenhagen and UEFA to prevent sports manipulation at the European Football Championship 2024.

July

Success against illegal gambling advertising through streaming platforms from abroad

The Higher Administrative Court of Saxony-Anhalt **confirmed GGL's legal interpretation** in its decision dated July 11th. This means that streamers based abroad can be prohibited from advertising illegal online gambling in Germany.

August

GGL publishes FAQs on betting on amateur league matches

for a fact-based public discussion.

September

Entry into force of Google's updated advertising guidelines

Google has made its advertising guidelines for gambling in Germany more stringent: Only operators holding a gambling permit by the GGL will be allowed to advertise via Google Ads from September 25th, 2024 - comparison portals are excluded. The objective is to ensure that only approved gambling operators can place Google adverts.

October

GGL achieves legal success against Swiss payment service provider

Administrative Court Halle upholds GGL's actions: national borders are no barrier to enforcing the use of payment blocking.

November

First public warnings

The GGL expanded its supervisory instruments **with the first public warnings.** The objective is to make transparent infringements by approved operators. It **signals to the relevant operators** that their behaviour will not be tolerated and is aimed at deterring other operators from committing similar infringements.

December

GGL finds that Google's updated advertising policy is having an impact

The GGL has been monitoring the implementation of the new guideline. The authority has since been able to verify that no paid advertising or advertising characterised as "sponsored" for illegal online gambling appears on Google's search results pages in Germany.

2024
Year in review

The year 2024 was one of further development and trend-setting decisions for the GGL. The GGL has established itself as a reliable institution three years on from the GlüStV 2021 coming into force, making a significant contribution to the regulation and control of the online gambling market in Germany.

The primary role of the GGL is to regulate the German online gambling market by reviewing and authorising cross-federal state gambling activities on the internet and ensuring that approved gambling operators are in compliance with the rules designed to protect players from gambling addiction and manipulation. It also combats illegal gambling activities and the advertising thereof.

The GGL was able to make it more difficult for illegal operators to conduct business last year by consistently implementing measures such as payment blocking, geo-blocking, bans and fines.
The authority's approach to the supervision of approved operators also ensured that the requirements of the GlüStV 2021 were enforced and thereby also ensured fair competitive conditions among all approved operators.

Milestones of the year

Combating illegal gambling activities
The GGL put together a broad package of measures in the fight against illegal operators. Cooperation with payment service providers resulted in tangible restrictions on deposits and withdrawals relating to illegal activities. Court rulings were successfully obtained for service providers that did not cooperate, such as the judgement by the Halle Administrative Court in October 2024 against a Swiss payment service provider.

Geo-blocking measures based on the Digital Services Act (DSA) were consistently expanded. Google has also revised its advertising guidelines on the initiative of the GGL: Only operators and brokers with a valid German gambling permit have been allowed to advertise their products and services in German search results through Google Ads since 25.09.2024.

Public debate surrounding illegal sports betting in the amateur sector
The topic of sports betting, especially with regard to amateur football, attracted increased public attention in 2024. The GGL has set up a FAQ section on its website to ensure transparency. Legal operators were requested to ensure that betting operators in the group of companies (sister companies abroad) take technical precautions so that players from Germany do not circumvent the legal requirements, for example using VPNs.

More transparency on regulatory issues for players
The GGL has set up a new FAQ section to provide players and interested parties with information on illegal gambling, permit requirements and player protection measures.

First public warnings
The first public warnings in October 2024 marked the use of another supervisory tool by the GGL. The objective is to use this tool to transparently communicate any violations by approved operators. It **signals to the relevant operators** that their behaviour will not be tolerated and is aimed at deterring other operators from committing similar infringements.

Evaluation GlüStV 2021
The process of evaluating the GlüStV 2021 by the states was intensively monitored in 2024. Initial targeted adjustments, such as the expansion of supervisory powers in relation to international operators and the applicability of IP blocking, were identified by the GGL as requiring urgent action. In doing so, the GGL is focussing on a fact-based discussion. The results of the studies already commissioned in 2023 on player protection, advertising and channelling will be incorporated into the evaluation process.

Collaboration with international institutions
The GGL further expanded its collaboration with European gambling regulators and international institutions in 2024. A targeted exchange of experiences got going in the specialist groups. Representatives of the GGL attended international trade events in the gambling industry, where they learned about new economic and technological trends in the market.

2

Legal gambling: Permit procedures and supervision

2.1. Overview

The authority was confronted with a large number of regulatory, supervisory and legal issues in 2024, which had both national and international dimensions.

Court proceedings on gambling losses
One of the most prominent issues in the German gambling market in 2024 was the reclaiming of gambling losses from illegal betting and other forms of gambling. Numerous gamblers filed claims for the refund of their stakes, especially against operators without a German gambling permit before 2021. Some of these proceedings were resolved in favour of the gamblers, but some operators refused to make repayments and referred to legally permissible enforcement. The decision by the Federal Court of Justice (BGH) in July 2024 involving the suspension of several proceedings and the referral to the European Court of Justice (ECJ) was of particular significance. The ECJ is required to clarify whether the freedom to provide services enshrined in EU law precludes the recovery of these losses. No such decision had been made by the ECJ by the end of 2024. The Maltese regulation “Bill 55”, which aims to protect gambling operators against foreign enforcement measures and is currently being reviewed under European law, is also associated with this.

Sports betting: Special supervision and public debate surrounding illegal betting on amateur league matches
The UEFA European Football Championship 2024 and the Olympic Games presented particular challenges for gambling supervision, notably due to intensive monitoring of advertising and betting. Advertising measures were reviewed during the European Championships and the online sports betting services were checked, with only a few infringements being identified.

A public debate arose at the end of the year about betting on German amateur league matches by foreign operators. This type of betting is not permitted in Germany, but players abroad may be able to participate legally depending on the legal situation there. The GGL called upon the approved operators to appeal to their sister companies to take measures to prevent access from Germany. It also published a FAQ document clarifying the legal situation and the differences between national and international regulations.

Legal proceedings: Cross-provider deposit limit and markers of harm
Another key issue involved the numerous lawsuits filed by gambling operators against permits granted and, in particular, against the requirements for higher deposit limits. The legality of the so-called "markers of harm" developed by the GGL was a major topic. These indicators for identifying problematic gambling behaviour, first developed by an authority, received judicial confirmation from the Mainz Administrative Court in 2024. This landmark judgement represents a milestone in player protection and lays the foundation for further measures to prevent gambling addiction. The GGL has taken on a leading role in this area at European level.

Revocation of gambling operator permits
A major supervisory procedure concerned the revocation of a gambling permit to operate online and land-based sports betting in accordance with §§ 4 to 4d in conjunction with § 21 Para. 7 GlüStV 2021. The provider had repeatedly infringed the licensing requirements. The online product was removed from the whitelist, whereas the land-based product was reinstated following a court ruling as part of an application for urgent legal protection. The decision had not yet become final at the end of 2024.

International cooperation and specialist events
The GGL strengthened its international presence in 2024 by actively participating in specialist events abroad.
These forums were used to exchange information with other regulatory authorities and to further develop effective supervisory measures. The dialogue contributed to identifying best practices and possible approaches for the further development of supervisory practice.

Collaboration with the federal states
The GGL works intensively with the gambling supervisory authorities of the states to ensure standardised and effective regulation of gambling. It was involved in various working groups on topics such as supervision and the betting programme.

Evaluation GlüStV 2021
The evaluation of the GlüStV 2021 was also intensively driven forward with the aim of identifying any necessary adjustments or further developments to the regulatory framework conditions.

2.2. Application procedure

The aim of the GlüStV 2021 is, among other things, to create framework conditions to transform previously illegal forms of gambling into the legal market to the greatest extent possible and to place them under state-controlled supervision. This also strengthens the protection of players and young people and contributes to the prevention of gambling addiction. Organising or brokering public gambling is subject to a corresponding gambling permit. All requirements of the GlüStV 2021 must be demonstrably fulfilled for this. This is particularly applicable to the various behavioural and behaviour-preventing player protection measures.

The GGL decided on a total of 230 applications in 2024, including 28 applications for basic gambling permit and 202 applications for amendments. This includes both positive and negative applications as well as applications that were withdrawn by gambling operators.

The situation in the area of **risk forms of gambling** was as follows: **Applications for amendments** formed a significant part of the application procedures. 175 applications regarding an amendment to the operator gambling permit were received in 2024, 71 of which were for virtual slot machine games, 10 for online poker, 83 for sports betting and 11 for horse betting on the Internet. All applications for amendments were decided upon by 31.12.2024.

After the separate application procedure regarding individual games in accordance with § 22a para. 1 sentence 2 GlüStV 2021 turned out to be particularly cumbersome in 2023, the individual game applications and the time-consuming game review necessary for this were given priority until May 2024 in order to ensure that operators have a legal gaming product that is a suitable alternative to illegal gambling. 1808 individual games for virtual slot machine games were tested. Over 15,000 individual games were checked across all operators.

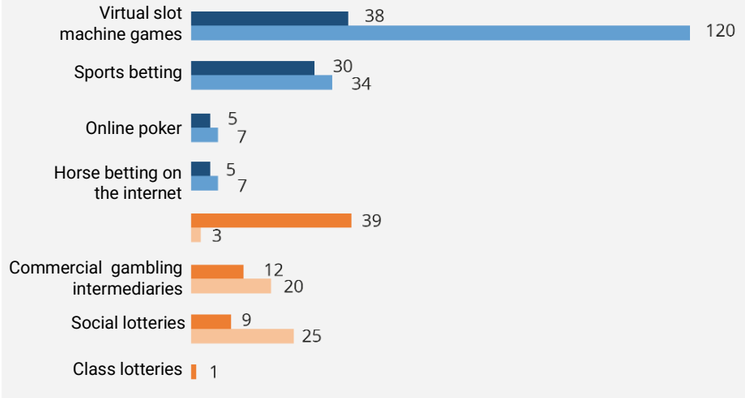
When it comes to **lower-risk forms of gambling (Lotteries)**, 4 applications for basic gambling permits and 27 applications for amendments were decided upon.

	Decided applications for basic gambling permits	Decided applications for amendments
Risk forms of gambling Virtual slot machine games | online poker | sports betting | horse betting on the internet	24	175
Lower-risk forms of gambling (Lotteries) Social lotteries | Class lotteries | Commercial gaming intermediaries | Lottery collectors	4	27
	28	202

A total of **139** operators or brokers of cross-federal state gambling had a permit as at 31.12.2024 and were included on the official whitelist.

	Number of operators /brokers under the supervision of GGL on whitelist	Number of associated websites on whitelist
Total	**139**	**216**
Risk forms of gambling	**78**	**168**
Sports betting	**30**	**34**
Virtual slot machine games	**38**	**120**
Online poker	**5**	**7**
Horse betting on the Internet	**5**	**7**
Lower-risk forms of gambling	**61**	**48**
Class lotteries	**1**	**0**
Lottery collectors	**39**	**3**
Social lotteries	**9**	**25**
Commercial gaming intermediaries	**12**	**20**

Operators/intermediaries and associated websites on the official whitelist that are supervised by the GGL



Whitelist

In accordance with § 9 Para. 8 GlüStV 2021, the GGL publishes a joint official list (whitelist) on the Internet, containing the operators and brokers of gambling that have a permit or permit in accordance with the GlüStV 2021.

The whitelist also specifies gambling activities that are not under the supervision of the GGL, but under the supervision of the gambling supervisory authorities of the federal states. These include lotteries organised by the Deutscher Lotto-Toto -Block and casino games in casinos.

The whitelist can be accessed on the GGL website and is updated on a regular basis. https://www.gluecksspiel-be-hoerde.de/whitelist

2.3. Special developments in the licensing and supervision activities relating to risk forms of gambling

When it comes to forms of gambling classified as risk, virtual slot machine games and online sports betting constitute the majority of licensing and supervisory activities. The special challenges posed by these two forms of gambling in 2024 are discussed below.

Virtual slot machine games
The high number of separate application procedures for individual games in accordance with § 22a Para. 1 sentence 2 GlüStV 2021 continued to pose a challenge in the area of application procedures in 2024. Reviewing these individual games is very time-consuming. Processing has been prioritised until May 2024 to ensure a comprehensive range of games for operators.
The GGL also examined possibilities for optimising the application process within the scope of evaluating the GlüStV 2021 with regard to § 22a GlüStV 2021. A number of different options have been developed and a decision is expected to be made once the GlüStV 2021 evaluation report has been finalised.

Sports betting
When it comes to sports betting, the particular challenges included intensified supervision during the two major sporting events, the 2024 European Football Championship and the 2024 Olympic Games, as well as the debate surrounding betting on amateur league matches and the use of data scouts when trading sports betting data.

European Championship 2024 and the Olympic Games
The importance of the Euro 2024 football championships for the German sports betting market meant that more intensive gambling law monitoring was conducted. Existing advertising measures were reviewed in the run-up to the European Championships and new planned advertising initiatives were enquired about with the operators.

The GGL participated in UEFA and Group of Copenhagen (GoC) measures designed to prevent and combat betting manipulation. The GGL was involved in corresponding working groups during the European Championships. The broadcasting of all 51 matches on broadcasting and streaming was monitored as part of the supervisory measures.
A comprehensive review of the online sports betting services offered by all authorised operators was conducted in parallel. Preventive preparation played a part in ensuring that infringements were successfully prevented in advance. Only a few offences were reported during the European Championships. Advertising offences or problematic clauses relating to the settlement of bets in general terms and conditions (GTC), presentations of sports betting with skill-related elements without a clear reference to the gambling character and gambling with an incentivising effect in the context of the European Championships were documented in particular. Many operators offered bets on all Olympic disciplines at the 2024 Olympic Games, but only a small number of them were advertised. There were only a few irregularities, including a few prize competitions with high prize pools, an advertising slogan that needed clarification and two types of bets that were subjected to an in-depth review.
Following further investigation, no hearings or prohibitions were necessary. There were no reports of any suspicions of manipulation.

Public debate regarding illegal betting on German amateur sporting events
The GGL was confronted in 2024 with an intense public debate and numerous media reports regarding the topic of betting on amateur league matches, particularly in football. Betting on amateur sporting events is not permitted in Germany. A number of media outlets reported that foreign betting providers were offering bets on German amateur matches abroad. This fact does not constitute a breach of the law. It may be legal for players abroad to bet on German amateur matches with foreign betting providers if this is permitted in the respective country. This is also the case, for example, for betting providers licensed abroad, the sister company of which has the same name and is licensed in Germany. Approved operators in Germany must technically ensure that access for players from Germany is prevented at affiliated companies abroad with the same name. The GGL exerted intensive pressure on the licensed gambling operators in 2024 and achieved success.

Nevertheless, the public debate on whether the approved operators should call on their affiliated companies abroad to refrain from offering bets on German amateur football matches continued.

Live betting is made possible by so-called data scouts, who also collect real-time data for amateur matches on behalf of data companies and transmit it to the betting providers. The media coverage prompted an intensified public debate surrounding the integrity of amateur football and the role of the sports betting industry.
GGL published an FAQ document on betting on amateur league matches on its website in response to the enquiries. This document clarifies the legal situation, explains the differences between national and international regulations and provides guidance for players and interested parties.

2.4. Special developments relating to lower-risk forms of gambling

The GGL conducted landmark administrative court proceedings in relation to a complaint lodged by a social lottery organiser. The proceedings revolved around two ancillary provisions relating to advertising in the organiser's notification. On the one hand, the question of whether the use of a logo on information and educational materials aimed at minors is permissible if the same logo is also used for a lottery, was addressed. On the other hand, there was the obligation of the organiser to ensure that commissioned third parties comply with the applicable advertising restrictions.

Supplement in March 2025:
The Federal Administrative Court dismissed the plaintiff's appeal (social lottery) and upheld the defendant's appeal (GGL). The court therefore comprehensively confirmed GGL's legal interpretation: The use of the logo representing the social lottery organiser on information and educational materials constitutes advertising for the lottery, since the logo is used both for the charitable activity and for the gambling product. The organiser's obligation to ensure that commissioned third parties are also compliant with advertising regulations is lawful.

2.5. Advertising supervision

Advertising and sponsorship are in principle permitted for approved gambling so as to direct people who are willing to gamble to safe and supervised offers. The GlüStV 2021 lays down the permissible framework conditions depending on the risk potential of the form of gambling. The GGL monitors advertising in order to ensure that it is in line with the relevant requirements and is not aimed at minors or target groups at comparable risk. The authority is also evaluating to what extent the existing provisions of advertising regulation are fit for purpose.

The GGL has been using a tool for the court-compliant evaluation and documentation of advertising campaigns since June 2024. The breaches identified in 2024 primarily related to the so-called embargo period (§ 5 para. 3 sentence 1 GlüStV 2021). Corresponding measures have been initiated. Intensified advertising monitoring was conducted in summer 2024. The GGL conducted increased monitoring of the advertising activities of sports betting operators in the run-up to and during the major sporting events of the European Football Championship and the Olympic Games. Individual violations of the ban on excessive advertising were identified. As a result, advertising measures that played down the character of gambling and portrayed sports betting as being influenced by knowledge and expertise, as well as those that depicted sports betting as an everyday occurrence, were challenged and subsequently stopped.

2.6. Legal proceedings

The GGL still has to deal with a number of lawsuits from online gambling operators. Almost all permits granted and notices of amendment in the areas of sports betting, horse betting on the internet, virtual slot machine games and online poker are subject to legal action. A total of 189 lawsuits were pending in this connection as of 31.12.2024, with GGL listed as the defendant. Dealing with these lawsuits takes up a big chunk of the resources in the relevant department. In addition to legal actions relating to permits and amendment notifications, the main focus in 2024 was on legal actions against so-called limit increase notifications.

Background information:
The objective of the cross-provider deposit limit, the implementation of which is ensured by connecting gambling operators to the so-called limit file, is to promote responsible gambling and reduce financial risks for players. The monthly deposit limit is set by the players on an individual basis and may not exceed EUR 1,000. Operators must therefore reject deposits that exceed the set limit.
The GGL can help operators reach the objectives of § 1 GlüStV 2021 by letting them set a different amount for individual players that isn't defined in the State Treaty, which can be used across operators. This is intended to prevent players from resorting to illegal gambling sites that do not impose any limits on deposits. The GGL granted limit increases based on a decision guideline back in 2023.

Operators were also given the possibility of granting limits higher than EUR 1,000 in 2024. However, almost all operators filed complaints against the conditions that must be met in order to be eligible for a higher limit. This primarily involved the markers of harm developed by the GGL. The main proceedings before the Mainz Administrative Court largely turned out in favour of the GGL. All markers of harm developed by GGL were deemed lawful in the decision. (*More information about the Markers of Harm can be found in chapter 4*). Following an evaluation of the decision guideline pertaining to the limit increases, a new decision guideline was prepared for the period from 01.01.2025. The GGL also anticipates numerous complaints in this area.

Another major procedure concerned the legal action against revocation of a gambling permit to operate online and land-based sports betting in accordance with §§ 4 to 4d in conjunction with § 21 Para. 7 GlüStV 2021. The provider, which had been operating its online services with a state permit since 01.01.2023, was repeatedly in breach of the licensing requirements and had failed to implement the prescribed technical player protection measures. The provider's online and land-based services have been removed from the whitelist. The latter had to be put back on the whitelist shortly afterwards, since the suspensory effect of the legal action against the revocation in relation to the land-based offer was restored by way of provisional legal protection. The administrative court proceedings had not yet been concluded by the end of 2024.

3

Illegal gambling: Enforcement

3.1. What is illegal gambling?

Illegal gambling is defined as operating or brokering gambling without official permit. Public gambling in Germany is only permitted in accordance with the GlüStV 2021 with the approval of the competent authority. Any violations shall be punished as an administrative offence or criminal offence and may entail heavy fines or prison sentences. Participation in illegal gambling also constitutes a punishable offence.

What regulatory instruments does GGL have at its disposal to combat illegal gambling?

The GGL uses a variety of measures to combat illegal gambling and the advertising thereof. These include traditional administrative proceedings with prohibition orders that can be enforced using penalty payments. Measures such as payment blocking and network blocking also come into play. Another important element is awareness raising, which is aimed at both the general public and operators.

Should there be any suspicion of criminal offences, the GGL will file a complaint in order to initiate criminal prosecution. In the event that proceedings are discontinued, the initiation of administrative offence proceedings is then examined. The GGL also works closely with other institutions. This is the case, for example, with the state media authorities, the Federal Network Agency and the Federal Financial Supervisory Authority (BaFin). The GGL is also expanding its contacts with supervisory authorities in other jurisdictions, something that is particularly helpful when taking action against large international corporations.

The GGL cooperates with the financial authorities in the event of breaches of tax law, while suspected cases of money laundering are reported to the Financial Intelligence Unit (FIU).

The GGL uses reports from its whistleblower system and complaints from the public for the identification of illegal gambling services and unauthorised advertising. Online research is also carried out using appropriate tools. Market presence, turnover volume and the advertising activities of gambling operators are among the indicators used to track illegal activities.

3.2. Overview 2024

The GGL successfully took enforcement action against on illegal activities and advertising for them in 2024 and was able to make the services of numerous illegal operators inaccessible to players in Germany. In doing so, the authority relied on a broad package of measures. The main successes include successes in payment blocking: Close cooperation with payment service providers has made deposits and withdrawals for illegal activities more difficult. The GGL relied on court decisions in the case of non-cooperative service providers, such as in the case of the Swiss payment service provider, for which the Administrative Court Halle ruled in the GGL's favour in October 2024.

Geo-Blocking based on the Digital Services Act (DSA) was also effective and was consistently expanded. The measures also targeted the advertising capabilities of illegal operators. In response to the GGL's initiative, Google has revised its advertising guidelines for gambling operators in Germany. Only operators with a valid German gambling permit have been allowed to advertise their products and services through Google Ads since 25.09.2024. This change resulted in a decline in advertising for illegal gambling offers. Despite this, the GGL believes that further action is needed to achieve even more restrictions on advertising opportunities for illegal gambling providers. The fundamental objective of the GGL is to make the business model of illegal operators and advertisers unattractive by means of supervisory measures.

As can be gathered from the following key figures, the GGL measures are proving effective. The key figures represent a snapshot in time, however, since new or already closed or blocked illegal websites are constantly being put into operation. It is also sometimes part of the business model of illegal operators to keep changing websites or to put them back online under a new domain. Another point to bear in mind is that many operators maintain so-called mirror sites - i.e. identical sites under different URLs with the aim of evading official measures. The number of closed or blocked websites alone therefore gives no direct indication of how many players were actually prevented from illegal gambling. Visitor numbers and gross gambling revenue are also relevant indicators in this respect.

The GGL's prioritisation in its approach focuses in particular on combating large illegal operators. This process generally takes more time and effort than removing smaller offers from the market. The GGL does not differentiate between German-language and foreign-language operations when taking action against illegal gambling offers. All that matters is whether the service can be accessed by players from Germany.

3.3. Measures taken by the GGL in 2024

3.3.1. Prohibition proceedings

The GGL initiates administrative proceedings against illegal operators and their advertisers and prohibits the corresponding activities. The year 2024 saw 199 new administrative proceedings for illegal gambling and 211 new proceedings for advertising illegal gambling. 1,788 websites were also checked, of which 1,053 concerned illegal gambling and 735 were advertising sites. Not every case confirmed the suspicion of illegal gambling. There was a total of 231 prohibition proceedings initiated, 83 of which related to the organising and advertising of illegal gambling and 148 of which related only to the advertising of illegal gambling.

By the reporting date of 31.12.2024, 188 illegal online gambling operators had discontinued their services for the German market and 284 advertisers had discontinued their advertising for illegal online gambling in Germany. These cumulative numbers equate to an increase of 61 discontinued services from illegal online gambling operators and 35 advertisers compared to 31.12.2023. Moreover, a total of 1,376 illegal gambling sites and 806 advertising sites for illegal online gambling were discontinued on the aforementioned reporting date. This corresponds to an increase of 459 illegal gambling sites and 288 advertising sites for illegal online gambling compared to the previous year.

A total of 96 operators of illegal gambling discontinued their services or advertisers ceased their advertising activities in 2024 due to hearings or injunctions.

	Administrative proceedings 2024	Websites checked	Initiated prohibition proceedings	Total discontinued offers	Total discontinued websites
Total	**410**	**1,788**	**231**	**96**	**747**
Of which gambling operators	**199**	**1,053***	**83**	**61**	**459***
Of which advertisers	**211**	**735**	**148**	**35**	**288**

*The number of websites recorded includes both German-language and foreign-language websites, primarily in English. So-called mirror sites are also recorded.

3.3.2. Network prohibitions

The network prohibitions proceedings mechanism was also not used in 2024 as intended by the legislator due to legal developments. The GGL was, however, able to enforce network blocks in other ways. The Digital Services Act (DSA) gives the GGL the power to request intermediary services, including host providers, to remove illegal gambling sites or block them for users in Germany (geo-blocking). The GGL actively took advantage of this regulation in 2024 and was able to make numerous sites inaccessible to players in Germany.

In this case, the GGL identifies the responsible providers of intermediary services (providers) by determining the IP addresses of the relevant domains, whereby the host providers are of particular relevance. The GGL requests that these providers, in line with their responsibilities, make the relevant websites inaccessible to users from Germany.

In practice, the providers often forward this request to the respective gambling operator, who then complies with the request themselves. The providers themselves take measures in other cases by blocking the domain for access from Germany or removing it completely from their servers. A total of 200 operators of illegal gambling have discontinued their services in response to requests for information, hearings or blocking orders. 657 websites were blocked or no longer accessible. Access to these pages is checked on a regular basis.

Websites can sometimes be accessed again by changing the provider. In such cases, the GGL re-initiates the process in relation to the currently valid provider and initiates appropriate measures.

Websites checked with illegal gambling activities	Measures for implementing the blocking procedures (requests for information, hearings, blocking orders)	Discontinued offers	Discontinued websites
799	**857**	**200**	**657***

*The number of websites discontinued also results from activities in 2023

3.3.3. Payment blocking

Payment blocking has also proven to be an effective instrument for preventing illegal gambling in 2024. The GGL is able to use this procedure to prohibit payment service providers from being involved in payments for illegal gambling. Whilst payment blocking does not necessarily result in illegal gambling operators leaving the German market, it does make it considerably more difficult for them to conduct business. The fact that established payment methods are excluded reduces how attractive the service is, since older, often less well-known and frequently poorly functioning payment service providers have to be used. These alternatives also undergo rigorous scrutiny and are combated. Despite the fact that the logos of well-known payment service providers could still be seen on some illegal gambling sites, actual processing of payments through these providers was generally no longer possible in Germany. The GGL reviewed this on a regular basis. The impression was often initially conveyed that a payment was being made via a reputable payment service provider. As the payment process proceeded, however, it became apparent that the transaction had to be processed through alternative, usually less well-known payment services. The payment blocking measures meant that 43 of the payment service providers addressed by the GGL cooperated in 2024 and discontinued their payment services for the illegal services concerned. These involved services offered by 53 operators of illegal gambling and 165 websites.

Payment blocking measures	Payment service providers that have discontinued their participation	of which affected illegal gambling operators	of which affected illegal websites
58	43	53	165

3.4. Legal proceedings

The GGL is also active in numerous court proceedings to combat illegal gambling and the advertising of illegal gambling in relation to the prohibition and blocking orders issued. 68 court proceedings were conducted in 2024.
The authorities filed 23 new criminal charges on the grounds of organising or advertising illegal gambling. Since many German law enforcement authorities fail to apply § 284 of the German Criminal Code (StGB), which criminalises illegal gambling, to operators based abroad, the GGL initiated a political debate surrounding this clause at various events in 2024. The GGL called for an extension of § 284 StGB to cover illegal operators abroad instead of the deletion planned by the Federal Ministry of Justice. This could lay the legal foundation for the establishment of a specialised public prosecutor's office.

3.5. Restriction on advertising opportunities

A central approach adopted by the GGL is to significantly restrict the advertising opportunities of illegal operators. The authority made contact with Google back in 2023 to initiate corresponding measures. The result that emerged from these discussions was an amended advertising guideline regarding Google Ads in September 2024, the outcome of a constructive exchange outside of a formal administrative procedure. The GGL monitored how this revised guideline was implemented and was able to ascertain a clear positive effect.

Nonetheless, the GGL recognises the need for further action and will remain in contact with Google with the aim of achieving further restrictions on advertising opportunities for illegal gambling operators. In addition to so-called cloaking, where advertising content is deliberately manipulated to bypass Google's ad controls, this also concerns the display of organic search results for illegal online gambling operators.

3.6. New developments

The GGL monitors new developments in the gambling market so that it can react quickly. Illegal operators are developing new technological methods to appeal to players or to bypass the GGL's blocking measures. This includes the use of cloaking techniques, for example, as well as illegal operators resorting to cryptocurrencies as another payment method or as the exclusive business model of so-called "crypto casinos".

One topic which the GGL also intensively addressed in 2024 was the legal evaluation of loot boxes. The GGL conducted a comprehensive dialogue with a number of experts and institutions in close cooperation with the states. This process will continue in 2025. The objective is to analyse the various perspectives relating to loot boxes from a technological and legal point of view and to develop a substantiated assessment of their regulatory classification.

4 Further responsibilities of the GGL and player protection measures

The equally important objectives of the GlüStV 2021 include ensuring the protection of minors and players and preventing gambling and betting addiction. The GGL plays its part in achieving these goals, for example by focussing on the following tasks in the "Addiction prevention" competence cluster:

- ***Examination of aspects relevant to addiction in the permit application process***
- ***Data-based evaluation of the effectiveness of the player protection measures of the GlüStV 2021***
- ***Further development of early detection of gambling addiction across all providers***
- ***Awareness and information work***

Compliance with player protection measures is also monitored by the LUGAS cross-federal state gambling supervisory system.

4.1. Competence cluster: addiction prevention

Establishment of binding standards for the early detection of gambling addiction across all operators

The GGL's competence cluster for addiction prevention focuses on the establishment and monitoring of binding criteria for the early detection systems for gambling addiction ("markers of harm") of the operators. Standardised markers of harm were already defined in the limit increase notifications in 2023, containing a certain number of markers depending on the form of gambling and which must be monitored over a defined observation period.

The standardisation and binding requirements are intended to ensure a uniform level of player protection and allow the authority to conduct a substantiated supervision and evaluation based on comparable data. In this case, the GGL has drawn up detailed requirements for the reporting obligation in connection with the cross-provider increased deposit limit with a view to standardising the monitoring reports. Approved online gambling operators are required to monitor the gambling behaviour of all players and report the anonymized results to the GGL.

Standardised questionnaires were sent to online gambling operators to ensure the comparability of the various early detection systems for gambling addiction within the meaning of § 6i Para. 1 GlüStV 2021 and their structure. The objective is to obtain a detailed understanding of the specific markers, indicators, threshold values and resulting intervention measures used for the future binding requirements.

The Gambling Survey 2023 was published in March 2024. The study revealed that 2.4% of the German population aged between 18 and 70 are affected by gambling-related disorders - a figure largely unchanged since 2021. The results provide a foundation for the evaluation of the GlüStV 2021 and future regulatory decisions. The GGL exchanged views with the authors of the study after its publication with regard to gambling research and its limits and possibilities. Networking meetings were also held with addiction organisations, researchers and representatives of the federal government as well as with the state coordinators.

The GGL held a meeting in May 2024 with the advisory body for those affected and the Federal Gambling-Free Association. The objective was to provide inspiration for everyday work, create a platform for discussion and exchange and establish an extended network. Such networks also facilitate GGL's capacity to incorporate the views and experiences of those affected by gambling addiction into its work. The GGL considers itself a mediator and point of contact for all players in the online gambling sector.

The GGL organised a "whistleblower action week" in September 2024 to coincide with the nationwide day of action against gambling addiction, encouraging people to take action through the complaints and whistleblower system and report infringements to the authorities.

On a European level, the GREF was instrumental in developing minimum standards for the early detection of gambling addiction (CEN) as well as player protection and addiction prevention initiatives. The **G**ambling **R**egulators **E**uropean **F**orum is a platform devoted to dialogue and cooperation between the regulatory authorities and the gambling industry.

4.2. LUGAS – cross-federal state gambling supervision system

The GGL uses the cross-federal state gambling supervision system (Länderübergreifendes Glücksspielaufsichtssystem (LUGAS)) to monitor the statutory requirements for legal online gambling activities.
Connection to this IT system is obligatory for approved operators.
LUGAS is made up of two IT systems: the so-called **central files** and the **evaluation system of the safe servers.** Both have been managed by the GGL since 01.01.2023 and operated by Dataport AöR as an IT service provider.

Central files
The central files comprise the **limit** file and the **activity file.** They are designed as a service for operators to ensure that they are able to comply with the law. The gambling provider is provided with the information it needs to fulfil its legal obligations from queries to the central files. The operators shall bear the costs for the central files. The **limit file** ensures that operators are able to comply with the cross-provider deposit limit set by the player themselves. The file totals the monthly deposits of a player with all licences operators. This information must be used by the provider to reject any deposit requests exceeding the individual limit. The **activity file** makes it possible for operators to prevent parallel play among several operators. In this case, the activity file manages the status of players across all operators, who can be either active or inactive. Provided that individual players are active through one provider, no other provider may make a player active and therefore facilitate participation in the game.

Safe server evaluation system
This evaluation system gives GGL the ability to systematically check compliance with the provisions of the GlüStV 2021. It is used to uncover any possible manipulation by providers, to review the systems for the early detection of problematic gambling behaviour and constitutes an important data source for the evaluation of the State Treaty on Gambling. A comparison is also made during the registration and login process with the OASIS player exclusion file, a system used throughout Germany to block players, which is run by the state of Hesse and administered by the Darmstadt Regional Council.

There was a significant increase in the number of registered players in the 2024 reporting year. There were 6.1 million players in the central files as of 31.12.2024, compared to 5.4 million at the end of 2023. An average of around 800,000 active players logged into one of the approved providers at least once a day in 2024. The availability of the central files was over 99.99 per cent in 2024. Comprehensive accessibility was guaranteed, especially during the European Football Championships.
When work on the safe server evaluation system was completed in 2023, a connection rate of 100 per cent was achieved in 2024 and the analysis of the very comprehensive data was intensified.

4.3. Information from the public about illegal gambling and irregularities involving approved operators

A core mechanism for combating illegal online gambling and uncovering irregularities among approved operators involves the use of the GGL's contact form to receive reports from the public in addition to internal enquiries. Around 8,000 indications were received in 2024. Around half of these related to suspected cases of illegal online gambling, the other half to possible infringements by approved operators.

The majority of indications concerning illegal gambling related to virtual slot machine games, online sports betting and commercial gambling brokers. Indications of advertising for illegal activities were also submitted.

When it comes to approved operators, whistleblowers primarily reported problems with pay-outs, impermissible advertising or infringements of the cross-provider deposit limit.
A detailed description of the circumstances is essential so that GGL can effectively take action against irregularities. Since the necessary evidence and information was often missing, some indications could not be conclusively verified.
The GGL 2024 published guidelines for the whistleblower system on its website in order to improve the quality of the information: https://www.gluecksspiel-behoerde.de/de/fuer-spielende/beschwerden-verstoss-melden

4.4. Anti-money laundering

In addition to continuing to review the anti-money laundering concepts at the licensing procedure level, the focus in the area of anti-money laundering prevention remained on supervisory activities. This included maintaining regular supervisory meetings with anti-money laundering officers of approved gambling operators and stepping up these meetings by reviewing their annual reports to the Executive Board and examining the quality of employee training in relation to anti-money laundering and terrorist financing typologies and methods.

The "EU Anti-Money Laundering Package" came into force on 09.07.2024, which includes specifically Directive (EU) 2024/1640 ("6th Anti-Money Laundering Directive" or "AML-D") and Regulation (EU) 2024/1624 ("Anti-Money Laundering Regulation" or "AML Regulation"). The Regulation is applicable from 10.07.2027, subject to certain regulated exceptions (Art. 90 AML Regulation). This reinforces the legal framework previously created by Directives (EU) 2015/849 dated 20.05.2015 and (EU) 2018/843 dated 30.05.2018 to combat money laundering and terrorist financing in the gambling sector by taking into account emerging risks and making it directly and uniformly applicable to the relevant obligated parties throughout Europe. The extent to which the new regulations will affect the existing licensing and supervisory requirements in the future was therefore examined in this context.

4.5. Market observation/research and studies

One of the tasks facing the GGL is to recognise significant developments in the online gambling market at an early stage with a view to advising politicians on the further development of legal regulations and undesirable developments. The GGL collects data in this regard on the German gambling market, prepares an economic analysis and provides an overview of the range and size of the segments in the legal and the illegal German (online) gambling market (see Chapter 5), among other things.
The GGL also initiates and oversees scientific studies on gambling-related topics.

Market observation
Gaining insights into software solutions in the field of early detection of gambling addiction was a key topic in 2024. The GGL conducted a survey of approved providers for this purpose.
The GGL also networked with other institutions with the aim of creating greater value for the authority through interdisciplinary knowledge transfer in associated specialist areas as part of specialist exchanges - for example with the Federal Physical and Technical Institute (PTB Berlin). The focus here was on exchanging experiences on the technical authorisation of terrestrial gaming machines as well as the testing of virtual slot machine games.
The examination of how land-based devices are licensed also served the purpose of gaining insights that can be used for the granting of permits and supervision in the field of virtual slot machine games.

There was also a collection of findings in the area of software service providers from approved and illegal gambling operators.
The focus here was on the (IT-infrastructural) correlation between operators, service vendors and game studios.

These findings will be further expanded upon and may help to combat illegal gambling even more effectively in the future.

The GGL has been working intensively with the technical instruments of online marketing for illegal operators with the aim of restricting the advertising opportunities of illegal operators even further in the future.

Two important studies were continued in the area of scientific research in 2024 and a new project was launched:

- Online player protection: Evaluation of the measures of GlüStV 2021 (contractor: University of Bremen)
- Gambling advertising on TV and Internet in the field of tension between channelling and addiction prevention (contractor: eye square GmbH)
- Study to investigate the black market and the channelling of online gambling based on a survey of players (contractor: Blockchain Research Lab gGmbH)

Expert groups were set up for the first two studies named, consisting of experts from the respective specialist areas from public authorities or scientific institutions. It is the core task of the expert groups to provide scientific support for the studies and to cover the entire spectrum of scientific discourse. The experts liaise closely with those responsible for the study and provide advice to the states and the GGL Executive Board concerning key aspects of the study design and provide additional impetus for the methodological approach. The focus here is on topics such as representativeness, drawing samples, questionnaire design as well as fundamental issues relating to the opportunities and limits of research projects.

Alongside regular dialogue between the GGL, the expert group and the federal states, those responsible for the studies also present the framework conditions and methodology of the studies at scientific meetings and conferences in coordination with the GGL. The GGL is in favour of this approach and regards the public presentation of the studies as a suitable way of involving the scientific community in the discussion at an early stage.

The approach taken in the first study was presented at the following specialist conferences in 2024:

"Digital Research Workshop" at the University of Bochum dated 20.06.2024 (online),

"14th European Conference on Gambling Studies and Policy Issues" dated 12.09.2024 in Rome.

Further public presentations relating to the studies are planned for 2025.

The results of the three studies will be incorporated into the evaluation of GlüStV 2021 and become an integral component of the final report in accordance with § 32 GlüStV 2021 as of 31.12.2026. The value of the commissioned studies totalled around EUR 1.4 million and covered three major topics that are currently the subject of public debate.

5

Development of the German gambling market

This chapter describes the development of the German gambling market. It depicts the extent of the various segments for 2024. Both the approved and the illegal market are covered.

5.1. Summary

The German gambling market is subject to both global and national economic developments along with the regulatory framework applicable in Germany. This primarily includes, depending on the form of gambling, the gambling regulations of the GlüStV 2021 as well as other legal provisions from tax law (Race Betting and Lottery Act), commercial law (Gaming Ordinance), business law (Anti-Money Laundering Act), criminal law (Criminal Code) etc.

Some 36.5% of the adult population aged between 18 and 70 in Germany report having taken part in at least one form of gambling in the last 12 months.[1] This equates to around 21 million people when extrapolated to the respective population figures. The regulated German gambling market had a total volume of around EUR 14.4 billion in 2024, as measured by gross gambling revenue (corresponds to the losses incurred by players). This corresponds to an increase of around 5% over the previous year. Tax revenue from gambling amounted to around seven billion euros in the same period.

Simultaneously, 2.4% (or an extrapolated 1.4 million people) of the German population between the ages of 18 and 70 are affected by a gambling-related disorder as defined by the criteria of the Diagnostic and Statistical Manual of Mental Disorders (DSM-5).[2]

The gambling operators under the responsibility of the GGL generated stakes (= stakes placed by players) totalling around 16 billion euros in 2024. Of these, the four so-called risk forms of gambling (sports betting, virtual slot machine games, online poker and horse betting on the Internet) accounted for 85% and the three forms of gambling from the lottery segment (class lotteries, social lotteries and commercial gambling intermediaries) for 15%. The gross gambling revenues of the operators regulated by the GGL amounted to four billion euros in 2024 and made up around 28% of the total volume of the German gambling market.

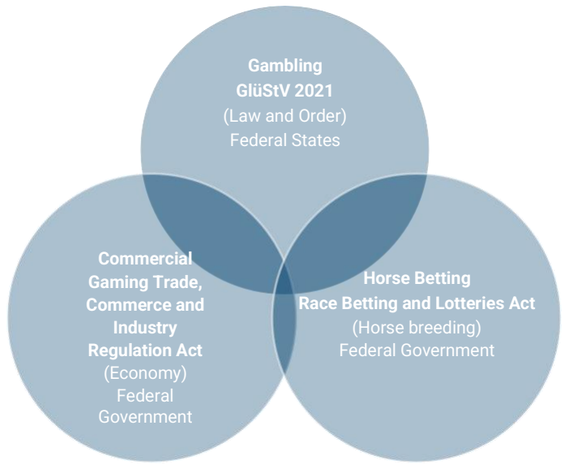
[1] Cf. Buth, S.; Meyer, G.; Rosenkranz, M.; Kalke, J. (2024): Participation in gambling and gambling-related problems in the population - results of the Gambling Survey 2023. Institute for Interdisciplinary Addiction and Drug Research (ISD), Hamburg.

[2] Cf. Buth, S.; Meyer, G.; Rosenkranz, M.; Kalke, J. (2024): Participation in gambling and gambling-related problems in the population - results of the Gambling Survey 2023. Institute for Interdisciplinary Addiction and Drug Research (ISD), Hamburg.

5.2. Framework conditions of the German gambling market

The German gambling market does not have a uniform structure, but is subject to either federal or state law, depending on the form of gambling. This means that responsibility for legislation falls to both the federal government and the states. The following is a systematic representation of the legal foundations and areas of responsibility. The different state-specific and cross-federal state forms of gambling are presented in particular. A detailed explanation of the origin and development of the GlüStV 2021 and the differentiation from other legal frameworks in other areas of law can be found in the GGL Annual Report 2023. The legal framework conditions of the German gambling market are shown in graphical and tabular form in Figures 1 to 3 below. The depictions reveal the interconnections between the three different legal categories and the responsibilities derived from them.

Figure 1: The division of the gambling market into the various legal categories



Source: GGL

Figure 2: Gambling on the German gambling market, broken down by legal basis

GlüStV 2021	Trade, Commerce and Industr Regulation Act	Race Betting and Lotteries Act
Federal States	Federal Government	Federal Government
• Casino games in land-based casinos • Lotteries - State lotteries • Lotteries of the Deutscher-Lotto-Toto-Block (DLTB) • Class lotteries - Lotteries with low risk potential • Social lotteries • Savings lotteries • Small lotteries - Commercial gaming intermediaries • Online sports betting and betting agencies • Horse betting on the internet • Arcades with amusement with prizes machines • Virtual slot machine games • Online poker • Online casino games	• Amusement with prizes machines for commercial machine operators	• Horse betting from racing clubs with a totalizer and /or bookmakers

Source: GGL

Figure 3: Gambling activities under the GlüStV 2021, broken down by competences

State Treaty on Gambling 2021	
Federal State laws	Federal State-specific procedures
Federal States	Cross-federal state
Gambling supervisory authorities of the federal states	Gemeinsame Glücksspielbehörde der Länder (GGL)
• Casino games in land-based casinos • Lotteries • Social lotteries 1 • Savings lotteries • Small lotteries 1 • Betting agencies • Arcades with amusement with prizes machines • Online casino games	• Class lottery of the Gemeinsame Klassenlotterie der Länder (GKL) and its lottery collectors • Social lotteries in all federal states • Commercial gaming intermediaries in all or multiple federal states • Sports betting • Horse betting on the internet • Virtual slot machine games • Online poker

1 social lotteries and small lotteries in the federal states are not examined in more detail below due to their minor significance.

Source: GGL

5.3. An economic analysis of the German gambling market

The scope of the German gambling market has been systematically documented and made public by the gambling supervisory authorities of the federal states since 2013. The GGL has been responsible for monitoring the development of the gambling market since the GlüStV 2021 came into force and intends to continue collecting and analysing data from the individual gambling segments as part of this task. It is also envisaged that the results will be compiled and published on a regular basis in ongoing reports on the German gambling market. This section presents how the German gambling market has developed in recent years and outlines the extent of the various segments for 2024 based on preliminary figures.

Both the approved and the illegal market are covered.

It is necessary to provide information on the most important terms used in market documentation in order to reflect the approved German gambling market. The following section presents the individual gambling segments of the approved market, explains the distinction between the approved and illegal market, specifies the measure used for measurement and describes the individual data sources and calculation methods.

Gambling segments

The market for approved gambling in Germany consists of the following twelve types of gambling eligible for a permit:

- *Casino games table games and gambling machines in land-based casinos,*
- *Amusement with prizes machines (AWPs) for commercial machine operators,*
- *State lotteries of the Deutscher-Lotto-Toto-Block (DLTB),*
- *State class lotteries,*
- *Social lotteries,*
- *Savings lotteries ,*
- *Commercial gaming intermediaries of lotteries*
- *Horse betting from racing clubs with a totalizer and/or bookmakers*
- *Sports betting,*
- *Virtual slot machine games,*
- *Online poker and*
- *Online casino games.*

Distinction between the approved and illegal gambling market

The German gambling market can be broken down into an approved and an illegal sector. The approved market involves activities that are eligible for licensing and for which operators also have a permit from a German authority. These include the gambling segments listed above. On the other hand, the term illegal market covers all activities, the operators of which do not have a permit from a German authority, even though such a permit is required, as well as activities that are prohibited and for which no permit can be granted by a German authority.

Measure: gross gambling revenue

The market volume is expressed in gross gambling revenue (GGR) in this report. Gross gambling revenue is calculated from the stakes minus the winnings paid out. This key figure is used to measure the revenue from the perspective of the operators on the one hand and the net losses of the players on the other hand and is the conventional international measure for recording the size of gambling markets. In contrast, the market size in online poker is determined by the so-called rake. The rake corresponds to the remuneration (commission) for participating in online poker.

Data sources

Different data sources are used to determine the approved market and calculate the market volume. The procedure here is as follows: Data is collected for the individual gambling segments either 1) directly in accordance with the information given by the operators, which is made available by the responsible gambling supervisory authorities, or 2) indirectly in accordance with the tax statistics published by the tax authorities. The market volume calculation is aggregated for 1) the respective segment across all operators and 2) extrapolated in accordance with the statutory provisions for tax calculation. In addition, 3) publicly available provider- or industry-specific findings, e.g. those from annual financial statements of operators, industry or association reports, etc., are also included in the data collection. In the event that data is available from multiple sources, the respective information is verified.

5.4. The approved German gambling market 2024

The approved gambling market is presented in this report based on the market volume in gross gambling revenues as well as the provider and distribution structure.

5.4.1. Market volume

The approved German gambling market measured in terms of gross gambling revenue had a total volume of EUR 14.4 billion in 2024. In comparison to the previous year, this corresponds to an increase of around EUR 0.7 billion (+5%). Figure 4 illustrates the development of the German gambling market since 2013.

It is clear that the market volume has returned to pre-COVID-19 levels, which let to in restrictions in land-based operations in 2020 and 2021, e.g. in casinos, arcades, betting agencies etc.

Figure 4: The German gambling market from 2013 to 2024

Source: GGL

Table 1 below shows the gross gambling revenues and the proportionate gross gambling revenues in online sales for the gambling segments listed so as to give some idea of the scale of the individual forms of gambling. To make comparisons easier, the forms of gambling are categorised according to: casino-style games, lotteries and betting are subdivided. Differences may occur when totalling the partial amounts due to rounding.

Table 1: The approved German gambling market 2024

The German gambling market 2024 - approved market		
in billion euros		
	Gross gambling revenue	of which online
Casino-style games		
Casino games in land-based casinos	1.4	**-**
Amusement with prizes machines (AWPs) in arcades/pubs	4.9	**-**
Virtual slot machine games/online poker	0.6	**0.6**
Online casino games	0.0007	**0.0007**
Casino-style games, total	6.9	**0.6**
Lotteries		
Lotteries of the DLTB	4.4	**1.2**
Class lotteries	0.2	**0.007**
Social lotteries	0.8	**0.4**
Savings lotteries	0.3	**0.001**
Lotteries, total	5.5	**1.6**
Of which commercial gaming intermediaries	0.5	**0.5**
Betting		
Sports betting	2.0	**1.3**
Horse betting	0.04	**0.02**
Betting, total	2.0	**1.3**
Gambling market, total	14.4	**3.5**
of which cross-federal state under the jurisdiction of the GGL	4.0	**2.8**

Source: GGL

It can be seen from Table 1 that the largest share of the approved market is made up of AWPs in arcardes/pubs at EUR 4.9 billion or 34%. The state lotteries of the DLTB command a market share of EUR 4.4bn or 30%. Of this amount, EUR 3.9 billion or 88% is accounted for retailers and direct sale on the internet and EUR 0.5 billion or 12% by commercial gaming intermediaries. Operators holding a sports betting permit account for EUR 2 billion or 14% of the approved market. By contrast, operators of virtual slot machine games and online poker in their third full year of licensing already make a contribution of EUR 0.6 billion or 4% to the approved market.

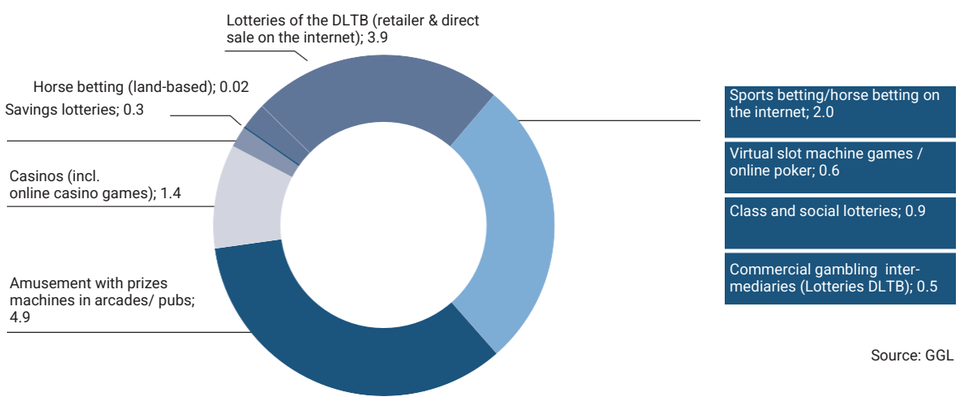
The share of land-based casinos in the approved market amounts to EUR 1.4 billion or 10%, whereby tables games accounts for 13% and gambling machines for 87%.

The class, social and savings lotteries, existing alongside the DLTB lotteries, collectively have a market share of 8% with a volume of around EUR 1.2 billion. The horse betting segment, by contrast, only accounts for 0.3% of the approved market at around EUR 0.04 billion. Online casino games were represented on the market for the first time in 2024
with a contribution of EUR 0.7 million. Breaking down the market into the three categories, 48% of the market is attributable to casino-style games, 39% to lotteries and 14% to betting. The market share of operators under the jurisdiction of the GGL amounts to around EUR 4.0 billion or 28% in 2024. The pie chart in Figure 5 provides a further graphic illustration of the breakdown of the approved gambling market.

The approved German gambling market 2024

Gross gambling revenue: 14.4 billion euros

Figure 5: The approved German gambling market in 2024, broken down by segment (in billion euros)



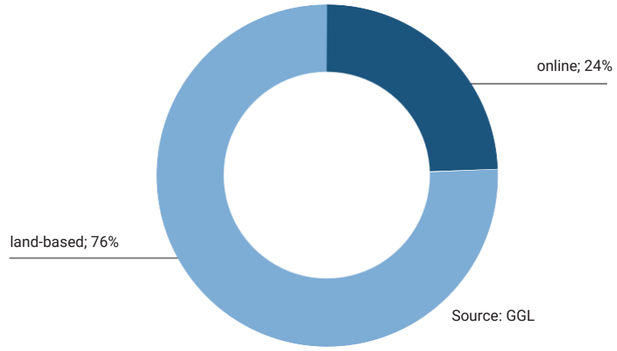
Dividing the volume of the approved German gambling market according to the type of distribution, EUR 10.9 billion or 76% was attributable to land-based transactions and EUR 3.5 million or 24% to online transactions. In comparison to the same period last year, the market share of land-based transactions increased by EUR 0.2 billion (+2%) and the market share of online sales rose by EUR 0.5 billion (+18%).

The growth in online sales is primarily the result of the shift in the sports betting segment from land-based transactions to those conducted online. Figure 6 shows the breakdown of the approved German gambling market into land-based ns and online transactions and graphically illustrates the ratio of 76%/24%.

The approved German gambling market 2024

Gross gambling revenue: 14.4 billion euros

Figure 6: The approved German gambling market in 2024, broken down by distribution



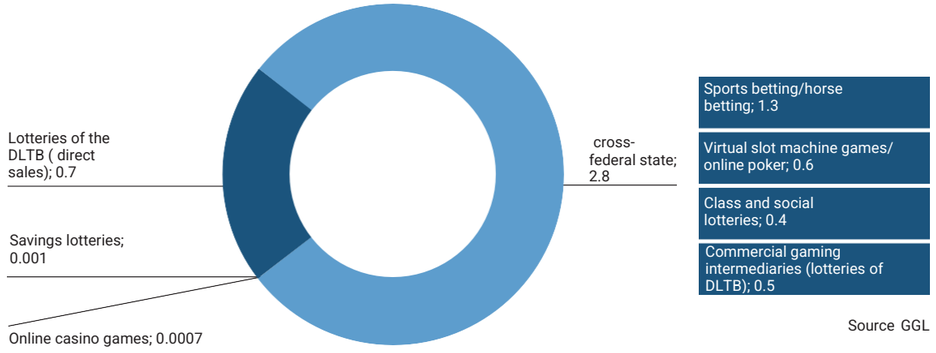
Notable market shares in online sales are held by the state lottery companies of the DLTB, commercial lottery intermediaries, social lotteries, sports betting operators and, since 2023, the operators of virtual slot machine games and online poker. The state lotteries generated gross gambling revenues of EUR 1.2 billion online (+22% compared to 2023). Of this, the state-run operators contributed EUR 0.7 billion (+17%) and the six commercial lottery intermediaries EUR 0.5 billion (+31%).

Virtual slot machine games and online poker were recorded for the third time in 2024 and generated online revenues of EUR 0.6 billion (+38%). Operators of sports betting generated a total of EUR 1.3 billion (+10%) online in 2024. This is followed by social lotteries with gross gambling revenues totalling EUR 0.4 billion (+12%). The share of the online market attributable to operators under the responsibilities of the GGL is around EUR 2.8 billion or 79%. Figure 7 provides a graphic representation of how the market shares are divided.

The approved German gambling market 2024 (in billion euros)

Gross gambling revenue: 3.5 billion euros

Figure 7: The approved German online gambling market 2024



Source GGL

5.4.2. Operator and distribution structure

In addition to the market volume, the approved German gambling market can also be measured in terms of the operator and distribution structure. Overview 1 below summarises the number of operators with a gambling permit as well as the scope of distribution channels for the individual gambling segments in 2024.

Overview 1: Operators with a permit and active sales

- *Casino games: 21 casino companies with 71 land-based casinos*
- *Amusement with prizes machines: around 5,000 commercial machine operators in around 8,500 arcades*
- *State lotteries: 16 state lottery companies (16 of them online) with around 20,150 lottery-retailer outlets*
- *Class lotteries: GKL Gemeinsame Klassenlotterie der Länder with 39 lottery collectors (three of them online)*
- *Social lotteries: Eight (thereof seven active) social lottery companies (seven of them online)*
- *Savings lotteries: 29 lottery providers of the cooperative and saving banks (23 of them online)*
- *Commercial gaming intermediaries: Twelve (thereof eleven active) intermediaries (seven of them online)*
- *Horse betting: 40 active racing clubs with totalizers, 32 bookmakers with 143 venues, five operators on the internet*
- *Sports betting: 32 (thereof 27 active) operators (of which 18 online/9 hybrid with around 2,300 betting agencies and around 12,000 ODDSET outlets permitted until June 30, 2024)*
- *Virtual slot machine games: 40 (thereof 36 active) operators*
- *Online poker: Five operators*
- *Online casino games: One operator*

5.5. The illegal German online gambling market

In addition to the market for approved gambling, illegal gambling also persists in Germany. This report solely considers illegal gambling online. The illegal online gambling market includes the following segments with illegal gambling forms:
Sports betting | Virtual slot machine games | Online poker | Online casino games| Secondary lotteries | Other forms of gambling in accordance with § 3 para. 1 GlüStV 2021.

The activities undertaken in the illegal market comprise forms of gambling eligible for a permit, for which the operators do not have a permit from a German authority, despite the fact that such a permit is required, as well as activities not eligible for a permit, for which no permit can be issued by a German authority. It is important to keep in mind that the illegal operators of virtual slot machine games and online casino games generally offer both forms of gambling at the same platform. This is why these two segments are presented together. Many illegal online gambling operators also offer sports betting and, to an increasingly lesser extent, poker games. These operators are referred to as generalisers in the following analysis. By contrast, there are also operators who have specialised exclusively in one segment. These operators are therefore also known as specialists.

Other segments that can be allocated to the illegal market include:
Gambling machines and other illegal gambling media in so-called illegal secondary establishments, e.g. sports bistros, pseudo gambling halls, gambling cafés, etc. | Illegal sports betting outside of betting agencies | Online gambling in P2P overlay networks (darknet).

The scope of these segments is not covered in this report.

A total of 858 German-language websites with gambling forms from 212 operators without a permit from a German authority were identified in 2024. During the same period last year, 761 websites from 205 operators were monitored. The following Table 2 provides a summary of the most important data on the scope of the illegal online gambling market for 2024.

Information on the systematics of the collection

The figures shown in this report regarding the illegal online gambling market mainly relate - as in previous years - to German-language websites offering illegal gambling. Nevertheless, the GGL focuses its measures on all services that can be accessed from Germany and are relevant for the German market.

It is important to bear in mind that many operators operate so-called mirror sites - i.e. identical sites under different URLs with the aim of evading official measures. This duplication further complicates attribution and assessment.

The introduction of a new, more comprehensive collection system is planned so that the structure of illegal online gambling can be taken into account even better in future. This will systematically record not only the German-language offerings but also sites in other languages and technical circumvention structures. The aim is to provide an even more accurate picture of the scope of the illegal gambling market from a German perspective in the future.

Table 2: The illegal German gambling market 2024

The German gambling market - illegal market 2024			
	Number of		
	operators	German-language websites	Gross gambling revenue in million euros
Forms of gambling			
Sports betting	**129**	**382**	
Online casino games/Virtual slot machine games	**202**	**838**	
Online poker	**14**	**14**	
Secondary lotteries	**11**	**20**	
Total	**212**	**858**	**500 - 600**
Number of operators broken down by origin			
EU	**19**		
Non-EU	**174**		
unknown	**19**		
Total	**212**		
Multiple offers			
Generalists	**192**		
Specialists	**20**		
Total	**212**		

[1] Operators with registered office/permit in/from abroad, e.g. Curaçao, Belize, Costa Rica, Marshall Islands, Alderney, Isle of Man, Malta, etc.

Remarks:
The number of operators and websites sometimes contains multiple counting's between the segments and should therefore not be added together. The number of secondary lottery websites also includes services offered by so-called lottery courier services, but not online instant lotteries, e.g. scratch cards, instant games, etc. on the Internet.
The number of websites featuring these services is included in the online casino games/virtual slot machine games segment.

As of: Autumn 2024

Source: GGL

It can be seen from Table 2 that of 212 illegal operators, 192 can be described as generalists, since they each offer more than one form of gambling, and twenty as specialists, since they each offer only one form of gambling. Moreover, the websites of 19 operators from an EU member state and 174 operators from a country outside the EU (152 of which are from Curacao) are available. By contrast, 19 operators could not be assigned to any country.
What's more, the table shows that a total of 838 of the 858 websites monitored contain virtual slot machine games and online casino games. Sports betting is offered on a further 382 websites, almost all of which also offer virtual slot machine games and online casino games. Conversely, websites with illegal online poker games can only be found to a limited extent. Since these segments constitute the illegal activities and, unlike the legal activities, there is only isolated documentation on the volumes from the operators for the German market, the gross gambling revenues must be estimated. The average visitor activity of these sites and known reference values for the average revenue of the individual forms of gambling can be used to estimate the size of the illegal market (black market). We can safely assume that the recorded illegal websites account for a market volume of between 500 and 600 million euros. This corresponds to around 3% to 4% of the total approved market (land-based and online) or around 25% of the market for risk forms of Online-Gambling.

5.6. Developments in gambling in 2024 under the authority of the GGL

5.6.1. Lotteries

The lottery segment is made up of the state class lotteries of the GKL Gemeinsame Klassenlotterie der Länder in accordance with § 10 Para. 3 GlüStV 2021, the social lotteries with a uniform game plan through Federal States across in accordance with § 12 Para. 3 GlüStV 2021 and the commercial gaming intermediaries which operate in all or multiple Federal States in accordance with § 19 Para. 2 GlüStV 2021.

5.6.1.1. State Class Lottery (GKL)

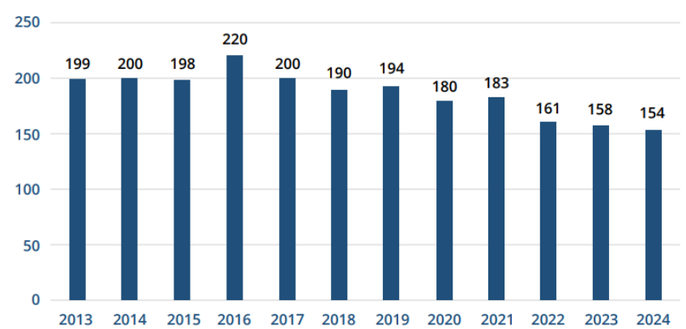
Definition:	Draw-based games
Affiliation:	Cross-federal state
Responsibility:	Gemeinsame Glücksspielbehörde der Länder (GGL)
Offer:	Nordwestdeutsche Klassenlotterie (NKL), Süddeutsche Klassenlotterie(SKL)

The state class lotteries are organised by the GKL. have been regulated on a cross-federal state basis since July 2012 and permits are issued on a Federal State-specific procedure. There were 39 lottery collectors in 2024, three of which with online sales.

Class lotteries generated gross gambling revenue of EUR **154** million in **2024**, whereby the SKL accounted for **60%** and the NKL for **40%.** This was EUR **four** million (-3%) less than in the previous year, see Figure 1.

Class lotteries had gross gambling revenues of EUR seven million **(+24%)** online during the period under review. This makes class lotteries, together with savings lotteries (see section 5.3), the forms of gambling with the smallest market share in the German online gambling market. The online share of the state class lotteries amounts to 4.4%.

Figure 1: Gross gambling revenue from class lotteries 2013 - 2024 in million euros



Source: GGL

5.6.1.2. Nationwide social lotteries

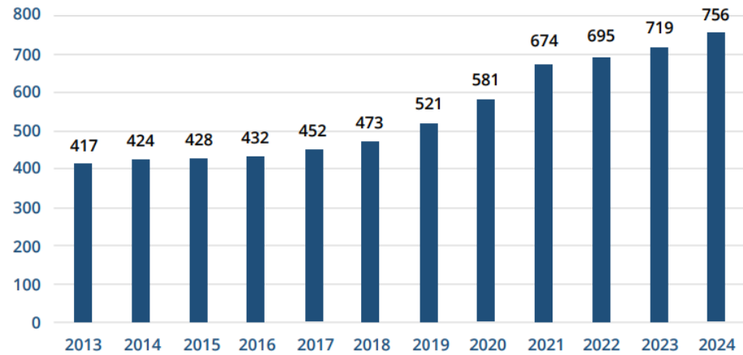
Definition:	Draw-based games
Affiliation:	Cross-federal state
Responsibility:	Gemeinsame Glücksspielbehörde der Länder (GGL)
Offer:	Various Lottery games

Social lotteries with a uniform game plan through Federal States across have been regulated on a cross-federal state basis since July 2012 and permits are issued on a Federal State-specific procedure. Eight operators had a permit in 2024, whereby all social lotteries were sold online, either by direct sales or through commercial gaming intermediaries, and three social lotteries were also distributed through land-based retailers

The gross gambling revenue from social lotteries amounted to EUR **756** million in **2024**. This was EUR 38 million (+5%) more than in the previous year, see Figure 2. The three largest social lotteries (Aktion Mensch, Postcode Lotterien and Deutsche Fernsehlotterie) achieved a combined market share of **96%.**

Social lotteries generated gross gambling revenue of EUR **400 million** (+12%) online in **2024**. Of this, direct sales accounted for EUR **376 million** (+11%) and commercial gaming intermediaries for EUR 24 million (+30%). The online share of social lotteries has steadily increased since July 2012 and reached **53%** in **2024**.

Figure 2: Gross gambling revenue from social lotteries 2013 - 2024 in million



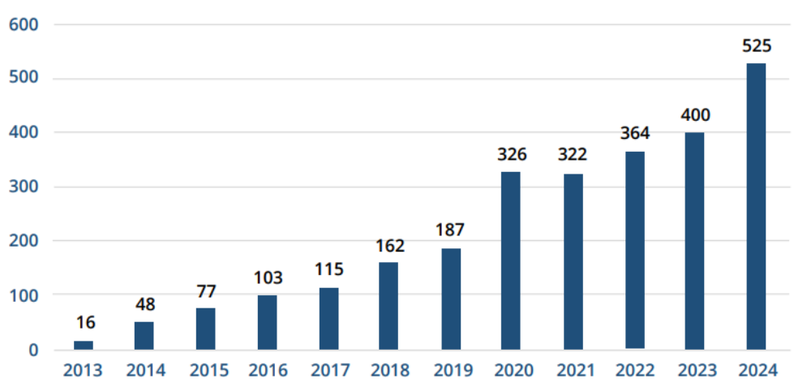
Source: GGL

5.6.1.3. Commercial gaming intermediaries

Definition:	Brokering of individual contracts or communities to a lottery operator
Affiliation:	Cross-federal state
Responsibility:	Gemeinsame Glücksspielbehörde der Länder (GGL)
Offer:	Brokering of DLTB state lotteries and social lotteries

Commercial gaming intermediaries has been regulated on a cross-federal state basis since July 2012 and permits are issued in bundled procedures. Twelve intermediaries had a permit in 2024, including seven with online sales and four with land-based / postal sales, while one intermediary had not yet started sales. Of the seven gaming intermediaries with online sales, six broker state lotteries of the DLTB and three social lotteries.
The gross gambling revenue from commercial gaming intermediaries reached EUR 525 million in 2024. This was EUR 125 million (+31%) more compared to 2023, see Figure 3. Of this, 95% or EUR 501 million (+31%) was generated by state lotteries of the DLTB and 5% or EUR 18 million (+30%) by social lotteries.

Figure 3: Gross gambling revenues from commercial gaming brokerage 2013 - 2024 in million



Source: GGL

5.6.2. Risk forms of Gambling

The so-called risk forms of gambling consist of **sports betting, virtual slot machine games** and **online poker** in accordance with §§ 4a-4d GlüStV 2021 and **horse betting** on the internet in accordance with § 27 Para. 2 GlüStV 2021.

5.6.2.1. Sports betting

Definition:	Betting with fixed odds on a future occurrence during a sports event, or the result of a sports event or on the result of segments of events
Affiliation :	Cross-federal state
Responsibility:	Gemeinsame Glücksspielbehörde der Länder Authority (GGL)
Offer:	Sports betting with fixed odds

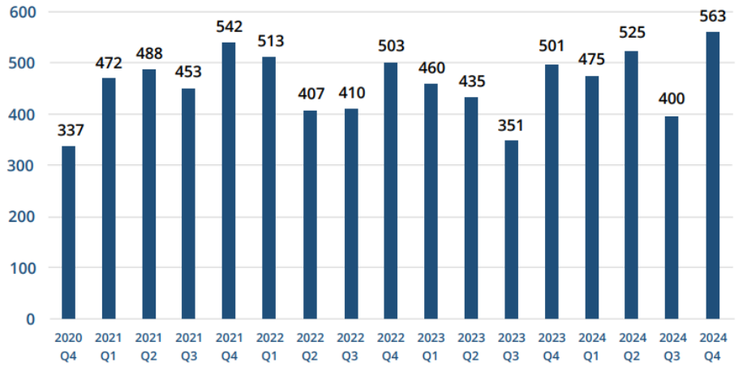
Sports betting was only allowed as a state monopoly on the German gambling market until 2012. The 16 state lottery companies of the DLTB organised ODDSET state sports betting with a permit for sales in lottery retail outlets.

Since July 2012 Sports betting has also been eligible for licensing by private operators both online and at betting agencies, whereby permits for the provision of sports betting are granted on a cross-federal state basis and, based on this, permits for betting agencies are issued by the respective states where the betting agency is located. The first cross-federal state permits could not be issued until October 2020 due to court proceedings.

Thirty-two operators had a permit to operate and broker sports betting in 2024, 13 of them for land-based and online sales (hybrid) and 19 for online sales only. Of the permit holder, 27 had an active service, of which nine were hybrid and 18 only online. Sports betting was offered online in 2024 through 28 active websites and through around 2,300 betting agencies and around 12,000 ODDSET outlets, which still had a transitional arrangement for this channel until June 30, 2024.

A large proportion of sports betting operators with a permit were already active on the market for the fourth year in 2024 and generated gross gambling revenue of EUR 1,963 million, though this dropped in the first and third quarters due to seasonal factors and rose again in the second and fourth quarters, see Figure 4. This equates to an increase of EUR 216 million (+12%) in comparison to the previous year, of which online sales accounted for 65% or EUR 1,276 million (+10%) and land-based sales for 35% or EUR 687 million (+17%). The betting stakes underlying the gross gambling revenues totalled EUR 8.2 billion in 2024 (2023: EUR 7.9 billion). The average pay-out ratio in the period under review was 76% (2023: 78%).

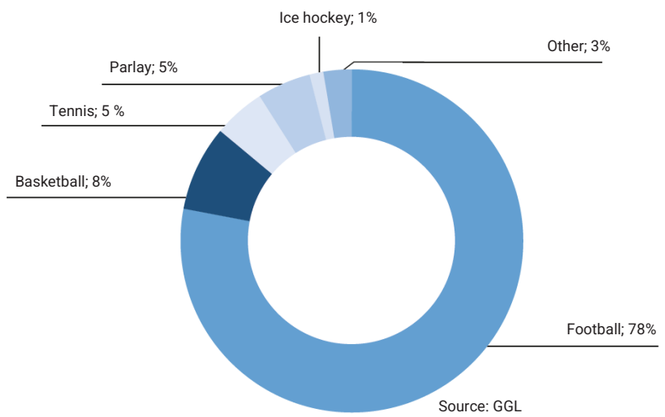
Figure 4: Gross gambling revenue from sports betting 2020 - 2024 pQ in million



Source: GGL

Sports bets can be placed either before a sports event (pre-match betting) or during a sports event (live betting). The ratio between pre-match- and live betting in 2024 was 47% to 53%. Figure 5 depicts the breakdown of sports betting stakes by type of sport. This means that 78% of bets are placed on football. This is followed by basketball with 8%, tennis with 5%, combinations of different sports with 5% and ice hockey with 1%. These four sports account for a total of 97% of betting stakes.

Figure 5: Betting stakes by sport in 2024 in %



Source: GGL

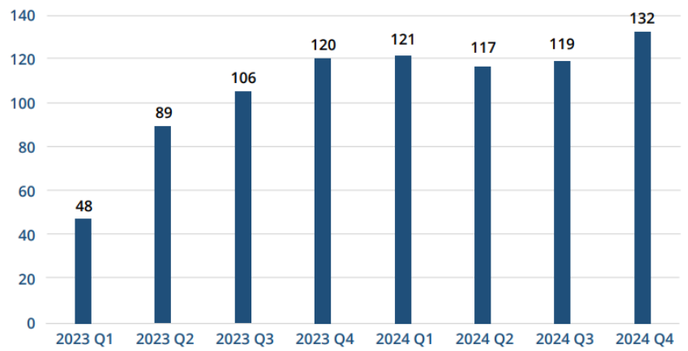
5.6.2.2. Virtual slot machine games

Definition:	Replicas of land-based slot machines offered on the Internet
Affiliation:	Cross-federal state
Responsibility:	Gemeinsame Glücksspielbehörde der Länder (GGL)
Offer:	Virtual slot machine games

The operation of virtual slot machine games has been eligible for licensing since July 2021. Forty operators had a permit in 2024, 36 of which were actively operating on the market with a total of 122 approved websites. Most operators received their permits in the years 2022 to 2023 and consequently had a service to offer all year round for the first time during the period under review.

The gross gambling revenue from virtual slot machine games reached EUR 489 million in 2024 and increased in all quarters with the exception of the second quarter, see Figure 6. This represents an increase of EUR 126 million (+35%) in comparison to the previous year, of which websites made up 68% or EUR 333 million and apps 32% or EUR 156 million. Stakes totalled EUR 4.3 billion in the period under review (2023: EUR 3.2 billion). As a result, the average return-to-player (RTP) is 88.5%. (2023: 88.7%).

Figure 6: Gross gambling revenue from virtual slot machine games 2023 - 2024 pQ in million euros



Source GGL

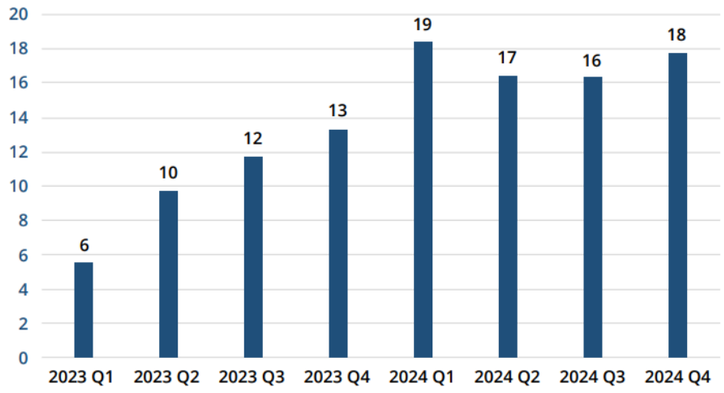
5.6.2.3. Online poker

Definition:	A variant of the game of poker without a banker, in which different individuals play against each other at a virtual table
Affiliation:	Cross-federal state
Responsibility:	Gemeinsame Glücksspielbehörde der Länder (GGL)
Offer:	Various online poker variants

Online poker, much like virtual slot machine games, has been eligible for licensing since July 2021. Five operators had a permit to offer online poker across six permitted websites and apps in 2024. All five operators were active on the market throughout the year for the first time during this period.

The operators of online poker generated a rake of EUR 69 million in 2024. This is an increase of EUR 29 million or 71% in comparison to the previous year, whereby websites accounted for 19% or EUR 13 million and apps for 81% or EUR 56 million. The rake rose in the first and last quarter of the year and dropped in the second and third quarter, see Figure 7. Stakes totalled EUR 0.8 billion in the period under review (2023: EUR 0.56 billion). This results in an average ratio between rake and stakes of 8.6%. (2023: 7.2%).

Figure 7: Gross gambling revenue from online poker 2023 - 2024 pQ in million euros



Source: GGL

5.6.2.4. Horse betting on the Internet

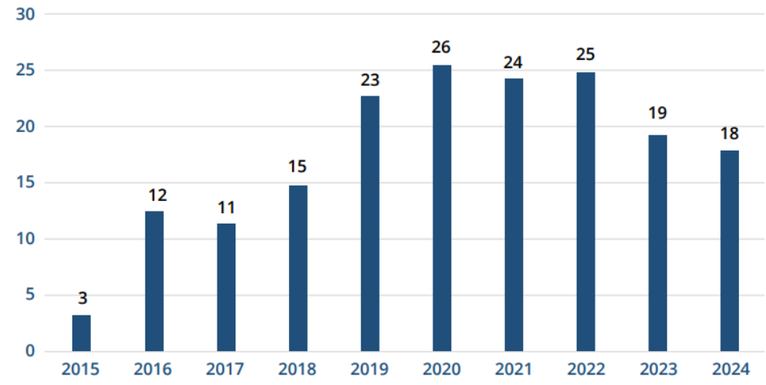
Betting on horses in Germany takes place in various ways: It may be offered by racing club with a totalizer at racecourses or by bookmakers in their premises, insofar as a permit has been obtained in accordance with the Race Betting and Lotteries Act and since 2012 also on the Internet with a cross-federal state permit. Only horse betting on the Internet is considered below.

Definition:	Betting on public horse races and other public performance competitions for horses
Affiliation:	Cross-federal state
Responsibility:	Gemeinsame Glücksspielbehörde der Länder (GGL)
Offer:	Horse betting with fixed and/or variable odds

There were five operators across Germany with a permit to operate or broker online in 2024.

Horse betting on the internet generated gross gambling revenues of EUR 18 million in 2024, or EUR 1 million (-7%) less than in the previous year, see Table 8. Of this, operating accounted for 52% and brokerage for 48%.

Figure 8: Gross gambling revenue from horse betting on the Internet 2013 - 2024 in million euros



Source: GGL

6 OUTLOOK

The GGL will continue to consolidate its role as the key point of contact for operators, players, associations and other stakeholders in the field of cross-federal state gambling in 2025. Findings and experience from previous measures are continuously being channelled into further development - with the objective of implementing effective, practical and targeted approaches.

The further development and use of safe servers is a particular focus. These are designed to further improve the supervision of the approved gambling market and facilitate more precise monitoring.

At the same time, the decision in a large number of main proceedings - both in connection with action against illegal operators and in the area of supervision of approved operators - has yet to be made. These judgements will exert a significant influence on the future regulation and monitoring of the market and further tighten the legal framework.

The GGL will continue to consistently utilise and further develop the tool of public warnings in the future. The objective is to make infringements of applicable law transparent and to sustainably enforce legally compliant behaviour.

Another focus lies on ongoing advertising monitoring. The advertising activities of illegal operators in particular will continue to undergo close observation and analysis. This also includes tracking relevant websites. The GGL will take targeted action aimed at platforms such as Google in order to reduce the visibility of illegal advertising.

Intensive cooperation with national and international authorities will be stepped up in order to further curtail the illegal gambling market. In doing so, the GGL not only looks at the operators themselves, but also at their technical service operators, advertising partners and other supporting parties.

The GGL will also be actively supporting the states in the evaluation of the GlüStV 2021 in 2025. Initial results obtained from the studies commissioned by the GGL form the basis for sound recommendations for action and a resilient assessment of the current regulations.

The fight against illegal operators remains a long-term process. It requires strategic action, a consistent approach and close co-operation across authorities. The GGL will continue on its chosen course.

Legal details

Publisher:
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