



HELLENIC REPUBLIC

Ministry of Education, Religious Affairs and Sport  
General Secretariat of Sport

Anti-Illegal Betting – Day Conference on  
Combatting Illegal Betting  
HGA, Athens, 06.03.2024

# International and National framework against illegal betting

ε.π.αθ.α.  


**George Mavrotas**

Secretary General of Sport

Chairman of National Platform (EPATHLA)

Chairman of Follow Up Committee of the Macolin Convention

# Contents

- Connection of Illegal Betting and manipulation of sport competitions
- International framework
  - Macolin Convention
- National framework
  - EPATHLA
- Conclusions



# Why fight illegal betting?

- Illegal betting is harmful for betting operators
  - Unfair competition, they lose share, they lose credibility (with fake sites)
- Illegal betting is harmful for the betting customers
  - Maybe more attractive odds but untrustful exchanges
- Illegal betting is harmful for governments
  - They lose taxes, they cannot apply efficient regulative policies, no AML
- Illegal betting is harmful for sport
  - Increases dramatically the risk of manipulation of sport competitions

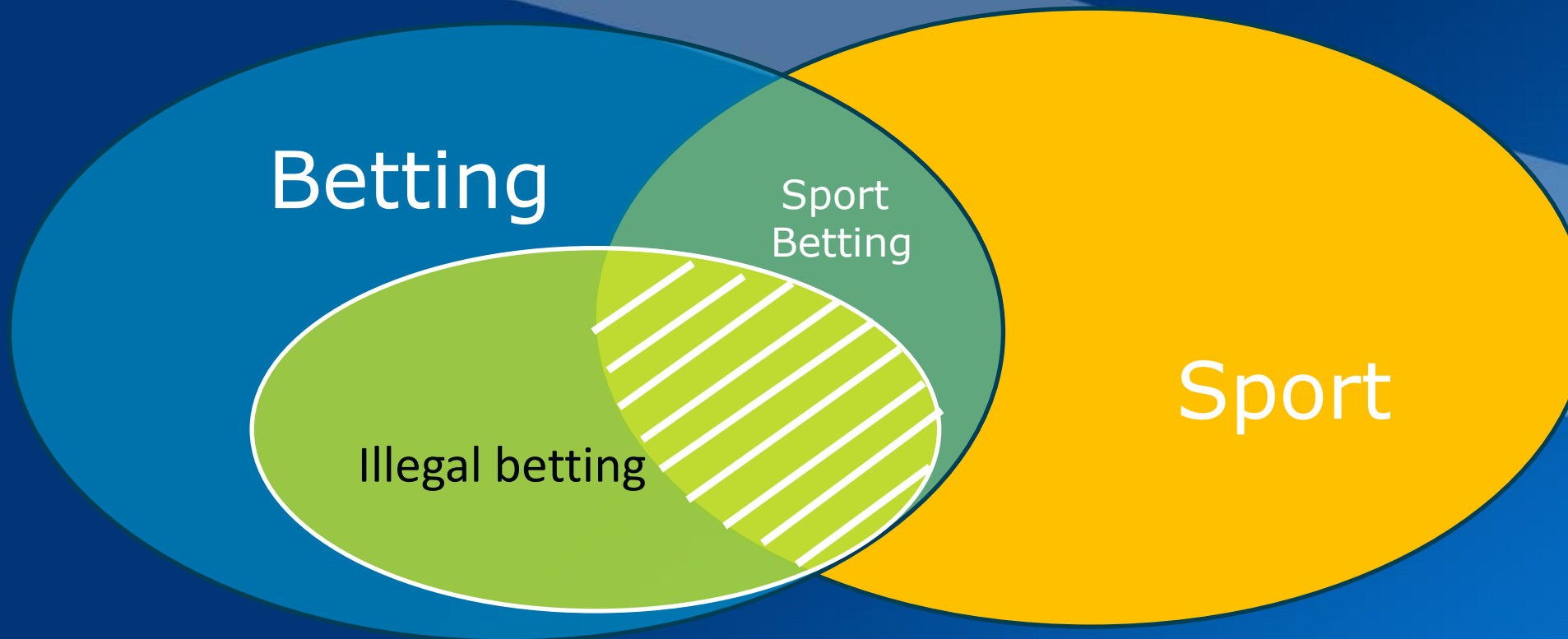


# The view from the sport side

- Sport is affected by betting
  - Positive effects: sponsorship, fostering the interest of public ...
  - Negative effects: risk for manipulation for betting reasons
- Illegal betting **multiplies** the negative effect



# Illustrative representation



Illegal betting is not negligible.

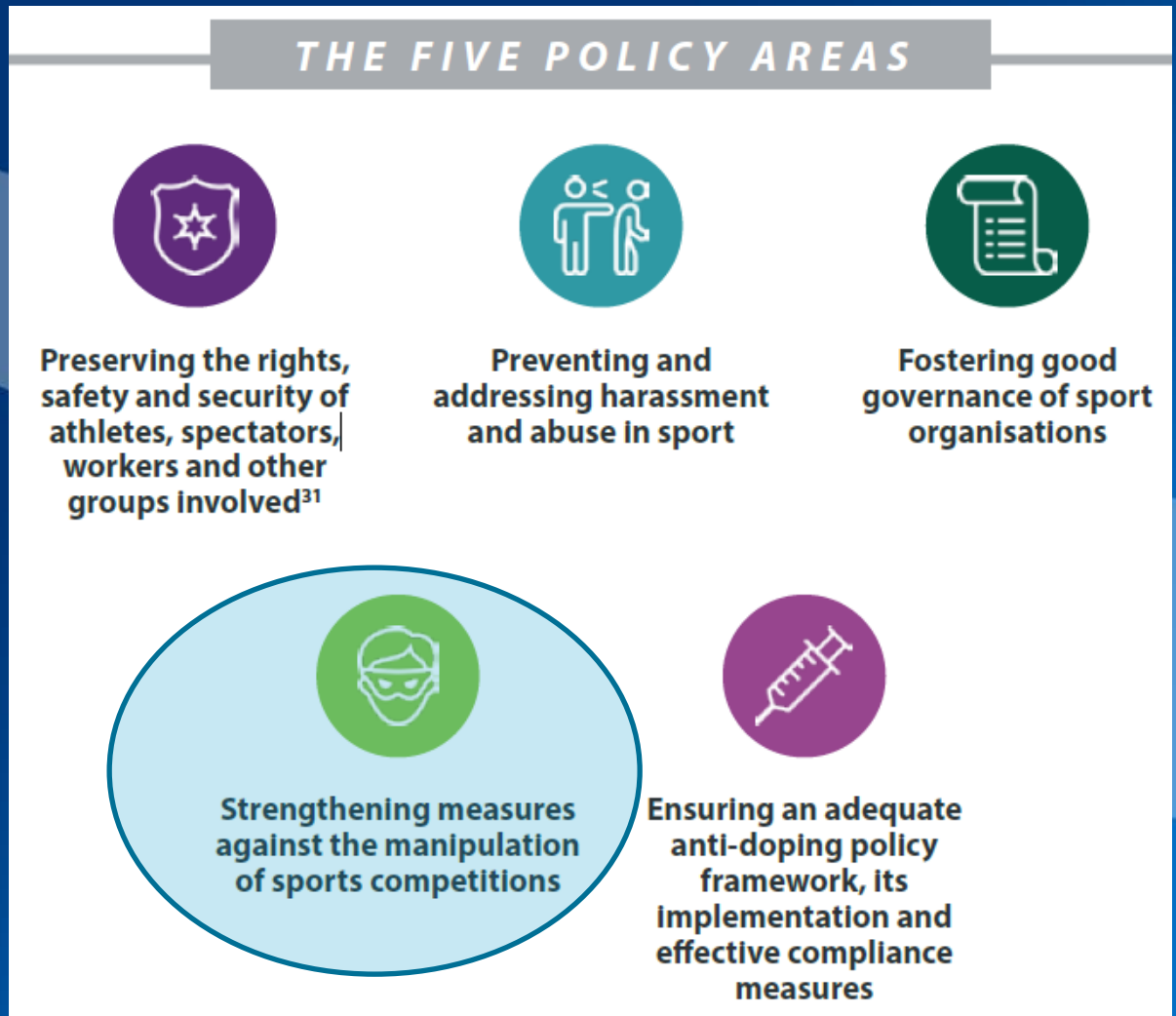
“...the amount wagered on illegal betting markets is between \$340 billion and \$1.7 trillion.”  
*UNODC 2022*

“...the illegal sports betting market is at least as big as the legal market in terms of margin”  
*ARF 2022*



# Sport Integrity

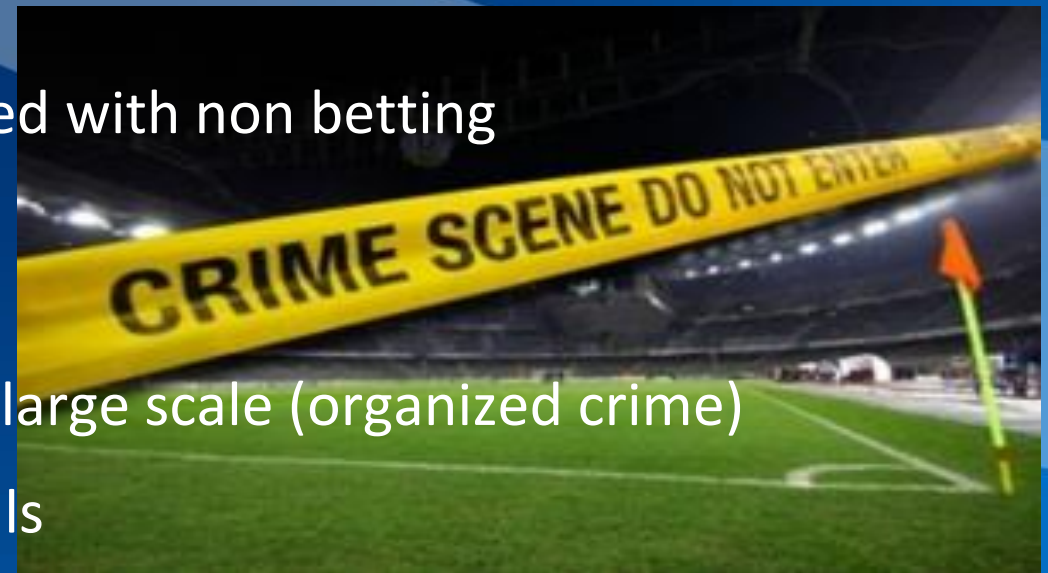
- Very high in sport agenda
- UNESCO Kazan Action Plan, 2018
  - Integrity of people
    - Spectator violence
    - Harassment, Abuse
  - Integrity of Organizations
    - Good governance, anti-corruption
  - Integrity of Competition
    - Doping
    - Manipulation of sport competitions





# Manipulation of sport competitions

- *“... means an intentional arrangement, act or omission aimed at an improper alteration of **the result or the course of a sports competition** in order to remove all or part of the **unpredictable nature** of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for others.”* (Macolin Convention, Article 3, definitions)
- Mostly related to betting but is also related with non betting incentives (sport purposes)
- Multi billion business
- From small scale (micro manipulation) to large scale (organized crime)
- Low risk – high profit business for criminals
- **Major threat for the values and the credibility of sport**



# International Framework – Sport Movement

## Combating match fixing

- Sport movement
  - International Olympic Committee (IOC)
    - International federations
    - National Olympic Committees
- Sport movement cannot tackle the problem alone
  - Cooperation & synergies with governmental institutions (law enforcement, betting regulatory authorities etc)





# International Framework – Integovernmental Organizations

- UN
  - UNESCO → Kazan Action Plan
  - UNODC → Anticorruption resolutions 7/8, 8/4
- European Union
  - Working plan for Sport 2021-24
- Interpol – Europol
  - Anti Match Fixing Task Force
- Council of Europe
  - Macolin Convention



# Council of Europe

Human Rights  
Democracy  
Rule of Law

CoE is the most  
influential  
intergovernmental  
organization for  
sport



MINISTRY OF EDUCATION RELIGIOUS AFFAIRS  
AND SPORT, HELLENIC REPUBLIC

# Convention on the Manipulation of Sports Competitions (Macolin Convention)



Convention on the Manipulation  
of Sports Competitions  
(the Macolin Convention)

INTO FORCE ON 01/09/2019

9 RATIFICATIONS (GRE, ITA, MDA, NOR, POR, SUI, UKR, ICE, FRA)

41 SIGNATURES (INCLUDING AUSTRALIA AND MOROCCO)

## SPECIFIC TARGET

- ONLY **LEGALLY BINDING INTERNATIONAL INSTRUMENT** DEDICATED TO MANIPULATION OF SPORTS COMPETITIONS
- **COMMON DEFINITIONS** OF BASIC CONCEPTS
- PROMOTE **NATIONAL AND INTERNATIONAL CO-OPERATION**

## SCOPE

- COVERAGE OF ALL PHASES: **PREVENTING, DETECTING AND SANCTIONING**
- MEASURES FOR ALL MAJOR STAKEHOLDERS INVOLVED

## VALUES

- ALIGNED WITH THE COUNCIL OF EUROPE VALUES: HUMAN RIGHTS, RULE OF LAW AND DEMOCRACY



OBSERVERS  
(CANADA, USA, LIBERIA, NEPAL...)

**OPEN FOR ACCESSION BY ANY  
COUNTRY IN THE WORLD**



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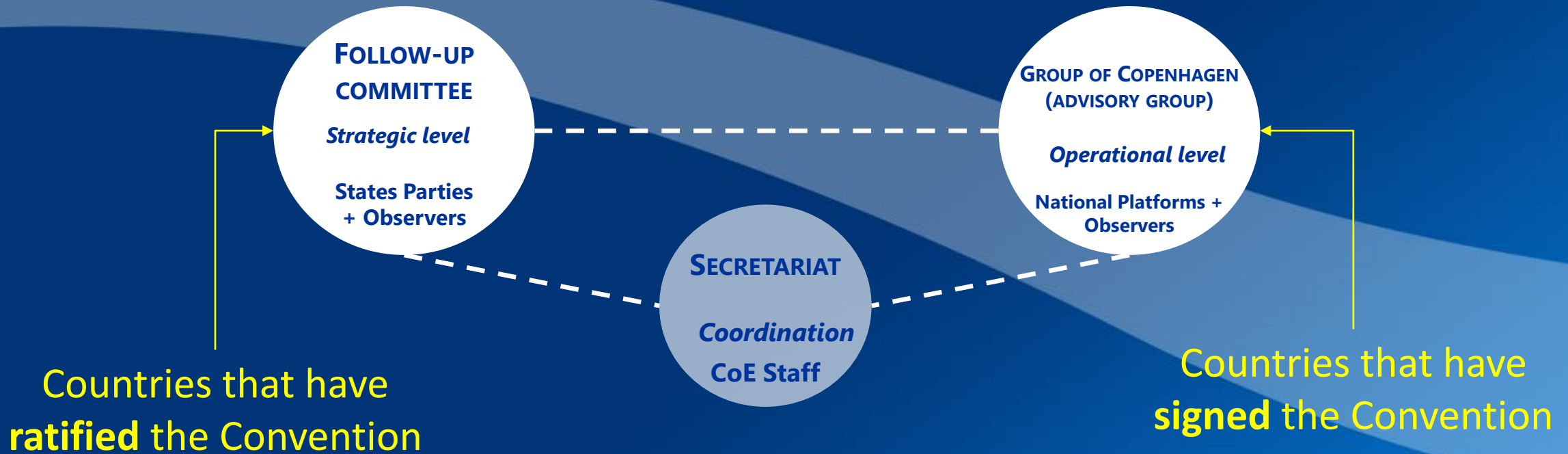


# Contents of the Macolin Convention

- Definitions
- Prevention, co-operation and other measures
- Exchange of information → National Platforms
- Criminal law and co-operation
- Jurisdiction, criminal procedure
- Sanctions and measures
- International Judicial co-operation
- Follow-up



# Macolin Convention Governance





# Key provisions for Illegal betting

## ■ Article 3: Definitions

“illegal sports betting” means any sports betting activity whose type or operator is not allowed under the applicable law of the jurisdiction where the consumer is located

## ■ Article 11: Illegal Betting

### Article 11 – The fight against illegal sports betting

- 1 With a view to combating the manipulation of sports competitions, each Party shall explore the most appropriate means to fight operators of illegal sports betting and shall consider adopting measures, in accordance with the applicable law of the relevant jurisdiction, such as:
  - a closure or direct and indirect restriction of access to illegal remote sports betting operators, and closure of illegal land-based sports betting operators in the Party's jurisdiction;
  - b blocking of financial flows between illegal sports betting operators and consumers;
  - c prohibition of advertising for illegal sports betting operators;
  - d raising of consumers' awareness of the risks associated with illegal sports betting.

← “Black list”

← Banks



# Illegal betting and manipulation

- It's not secret that one of the main reasons for manipulation of sport competitions is sport betting
- In legal (regulated) betting we can detect and we can trace which are the essential tools against match fixing
- In illegal betting we don't have this possibility
  - We don't have information about who, how much, when, where place bets in suspicious events
  - It attracts criminal behavior because it leaves no traces



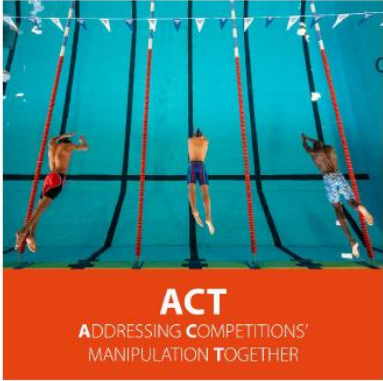
# Reasonable betting and Illegal betting

- If we want to have proper regulation of sport betting, we have to fight **illegal betting**
- **Reasonable betting** has to do with article 9 and the limitations on supply side
  - there must be minimum integrity standards to protect the operators, the customers and the athletes
  - it cannot be offered everything, anywhere for sport betting,
- This is **ineffective** if illegal betting is not confronted, because it will be a parallel unregulated system that absorbs excess demand



# Rabat, Morocco, November 2023

- ACT project CoE & EU
- All major stakeholders from Governments, Industry and Sport
- The importance of international cooperation and the role of Macolin Convention
- Very interesting presentations



**ACT**  
ADDRESSING COMPETITIONS'  
MANIPULATION TOGETHER



**MACOLIN COMMUNITY CONFERENCE**

**PRESERVING THE INTEGRITY OF SPORT BY COMBATTING ILLEGAL BETTING**

With the support of "La Marocaine des Jeux et des Sports"  
Public operator holding the monopoly on sports betting in Morocco

7 November 2023 | 9:30 AM-6:00 PM (GMT)  
Rabat, Morocco

PROGRAMME



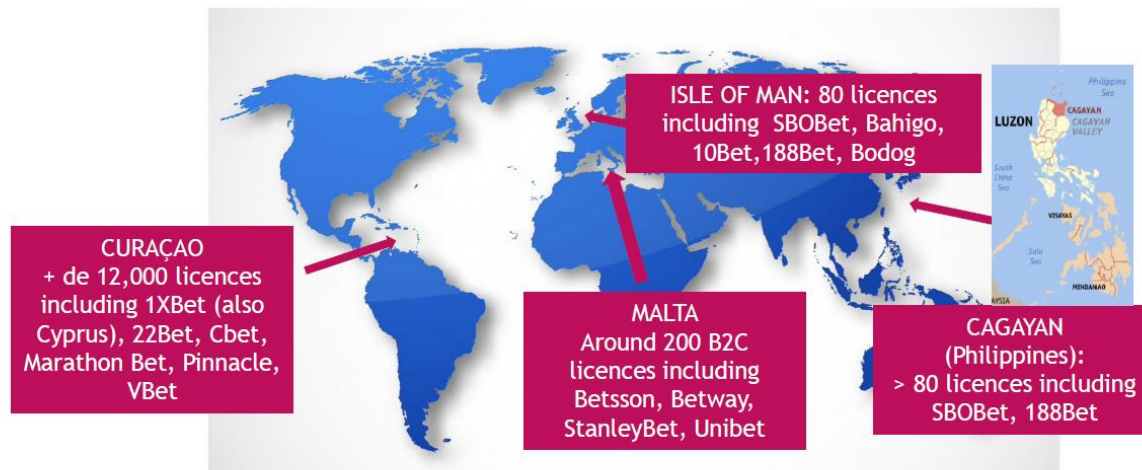


# Rabat, (source: CK Consulting)

## TYPES OF BETTING OPERATORS



## WHERE / WHO ARE THE ILLEGALS ?



## A HUGE ILLEGAL SPORTS BETTING MARKET: AROUND 35 bn. € WORLDWIDE

Sports betting GGR\* 2022 worldwide (horse betting excluded)



It is very difficult to estimate illegal turnover (very high pay out, hybrid networks street / online, Agents, etc.)

## ILLEGAL BETTING IS NO MORE A MINOR CRIME

### ILLEGAL BETTING IS CONNECTED TO MANY CRIMINAL OPERATIONS

- MONEY LAUNDERING (€ 230 millions)
- MURDERS
- ILLEGAL IMMIGRATION
- FORCED LABOR
- KIDNAPPING

**ARF study 2023**: « Somewhere between 75,000 to 250,000 people likely work in the offshore betting and related cyber-scam industry across these four jurisdictions in Southeast Asia alone (The Philippines, Cambodia, Laos, Myanmar) ».

Source : Philippines anti-Money Laundering Council (2021) – Asian Racing Federation (2023)





# Rabat, (source: Asian Racing Federation)



ASIAN  
RACING  
FEDERATION

## The Intersection of Illegal Betting, Cyber Scams, Human Trafficking & Transnational Organised Crime

By ARF Council on Anti-Illegal Betting &  
Related Financial Crime

November 2023



### EXECUTIVE SUMMARY

- ❑ Trillion-dollar-plus industry
- ❑ 2/3 market under-regulated / unlicensed
- ❑ Growing 2x fast as legal market
- ❑ **Tens of billions** for transnational organised crime
- ❑ **Tens of thousands** in modern slavery serving crime compounds
- ❑ Tech and expertise now applied to cyber-scams



[www.asianracing.org/aib/resources](http://www.asianracing.org/aib/resources)

### WHY IS ASIA A HUB FOR ILLEGAL BETTING?



- ~65% global turnover
- Limited legal options
- Organised crime filled gap
- Turbocharged by internet
- Now global impact

[www.asianracing.org/resources](http://www.asianracing.org/resources)



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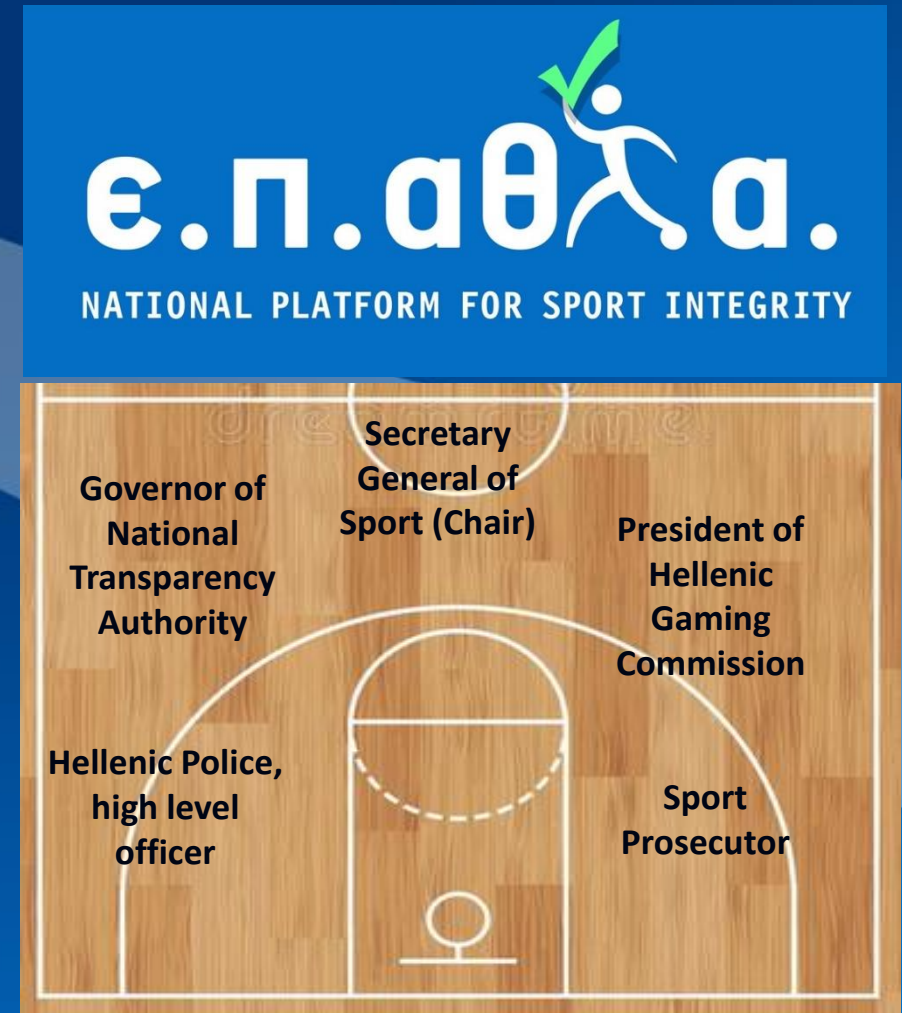


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# Proposed actions in national level (1)

- Intense collaboration & exchange of information in operational level
  - Law enforcement, Betting ecosystem, Internet Service Providers, Banks, AML...
  - “Black list” continuous update
- Exchange of expertise and good practices
  - Conferences, Seminars with the major stakeholders
    - Governments, Sport movement, Law Enforcement, Betting ecosystem



# Proposed actions in national level (2)

- Institutional interventions
  - Resolutions, recommendations, ministerial decisions, regulations
- Awareness raising
  - Spots produced by regulatory authorities
- Operations
  - Significant contribution of EPATHLA in the last case of illegal betting (explaining the methods and “terminology” found in the conversations)

[www.epathla.gov.gr](http://www.epathla.gov.gr)



The screenshot shows the website for the National Platform for Sport Integrity (EPATHLA). The header includes the logos for 'govgr BETA' and 'ε.π.αθλ.α.', along with language options for 'Ελληνικά' and 'English'. The navigation menu contains 'Home', 'National Platform', 'Sport manipulation', 'Educational material', 'News', 'Send a report', 'Links', and 'Contact'. The main content area features the title 'National Platform for Sport Integrity (EPATHLA)' with the tagline '“We join forces, we protect sports”'. Below this, there are two paragraphs of text: one explaining that sports manipulation is a major threat to integrity and fair play, and another stating that EPATHLA is derived from Article 13 of the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention) and is the main tool for its implementation in Greece. To the right of the text is a photograph of several people's hands stacked together in a circle, symbolizing teamwork and unity.





# Conclusions

- Illegal betting is the **fertilizer** for manipulation of sport competitions, due to the absence of relevant information
- Illegal (and unregulated) betting are **harmful** for sport, governments and betting operators.
- No borders, need for **global cooperation**
  - governments, regulatory authorities, betting operators, sport movement
- Macolin convention is the proper framework



*We join forces to protect sport*



*Thank you*

