

**Public hearing:**

## **DNS blocking of foreign online gaming sites – consequences for people affected by gambling-related harm.**

Public hearing: Promoting Safer Gambling Tools and Regulatory Framework for Norway.

### **Introduction:**

We appreciate the opportunity to respond to the public hearing on the Ministry of Culture's proposal to implement DNS blocking of foreign online gaming sites. We would like to present an argument based on a technical view from an organisation that works with people affected by gambling-related harm, advocating for the promotion of safer gambling tools such as BetBlocker and the establishment of an adequate regulatory framework instead of relying on DNS blocking.

### **Background/BetBlocker:**

BetBlocker is a free and open software/app designed to assist individuals with gambling problems in limiting their access to online gambling sites. Developed by a charitable organization of the same name, BetBlocker is trusted by thousands of people seeking to regain control over their gambling habits. Our focus lies in helping individuals manage their gambling patterns and reduce the risk of developing or exacerbating gambling-related issues. BetBlocker offers various functions to contribute to a safer gambling experience, with its primary feature being the ability to block access to a wide range of online gambling sites, including casinos, slot machines, sports betting sites, and lotteries.

This software operates using a comprehensive and regularly updated database of web addresses associated with online gambling sites. Privacy and security are paramount in Betblocker's design, as it requires no personal information to be transmitted or stored on external servers. This ensures the confidentiality and protection of user data.

### **1. Problems with DNS blocking and privacy concerns:**

1.1.1. Surveillance and insight: DNS blocking involve monitoring and filtering internet traffic to determine which websites to block. This intrusive approach raises concerns about user privacy, as it exposes their internet activity and compromises the confidentiality of the web pages and services they engage with.

1.1.2. Centralized control: DNS blocking often entails centralized decision-making, granting significant power to a unit or the government in controlling users' access to information and impeding freedom of speech. This centralized authority can lead to abuse and the restriction of legitimate web pages or content, including politically or culturally controversial material.

1.1.3. Net neutrality principle: The principle of net neutrality advocates for treating all internet traffic equally, regardless of content or source. Implementing DNS blocking for online gambling sites could set a detrimental precedent, undermining net neutrality. To preserve privacy, it is crucial to maintain transparency and accountability when establishing criteria for DNS blocking. Protecting user privacy and ensuring that DNS blocking is only used as a last resort and in compliance with the law is paramount.

## **2. Experience in other markets:**

2.1.1. Inefficiency of blocking: Experience from other countries that have employed DNS blocking of webpages reveals its inefficiency. Experienced people affected by gambling-related harm can easily circumvent DNS blocking through simple changes in web browsers or the use of advanced VPN tools. Consequently, only the least experienced users would be affected by such blocking measures, while determined individuals seeking access to these websites will find alternative ways to bypass the restrictions. Therefore, DNS blocking is unlikely to achieve the desired outcome of limiting people affected by gambling-related harm access to foreign gambling sites.

2.1.2. Workarounds and accessibility: During my tenure at a Russian gambling company based in the UK, before I worked in harm minimisation we frequently encountered website blocking by the Russian state; however, users were able to find simple workarounds to access our services. This highlights the limited effectiveness of DNS blocking in deterring determined individuals from accessing online gambling sites.

## **3. Technical challenges and disadvantages:**

3.1.1. Impeding gambling addiction tools: Implementing DNS blocking can render digital tools developed to assist people affected by gambling-related harm in limiting their gambling habits ineffective. For instance, if people affected by gambling-related harm choose to utilize BetBlocker or similar tools to block specific domains, these tools will no longer function if casino providers actively change their DNS and servers.

3.1.2. Updates and maintenance: BetBlocker relies on regular updates of its database to ensure efficient blocking of relevant web pages. If the government implements DNS blocking, it could lead to frequent changes in the blocked web pages. This poses challenges for BetBlocker to update its database promptly, resulting in inconsistent and incomplete blocking of gambling sites.

3.1.3. Technical skills and bypasses: Even individuals with limited IT knowledge can bypass DNS blocking using various technical skills and tools such as VPNs and proxy servers. This not only applies to individual players but also to gambling companies that aim to maintain access to Norwegian players. If gambling companies offer alternative methods to connect to their sites, the efficacy of the BetBlocker application will be diminished as it primarily operates at the DNS level.

**Conclusion:**

Based on privacy concerns and experiences from other markets, DNS blocking proves problematic as a strategy to address people affected by gambling-related harm. Furthermore, the practical effectiveness of tools designed to assist individuals with gambling addiction becomes compromised with DNS blocking. Instead, it is crucial to explore alternative methods that promote safer gambling tools like BetBlocker while concurrently establishing a comprehensive regulatory framework.

By prioritizing the promotion of safer gambling tools and fostering a robust regulatory environment, Norwegian authorities can better protect individuals at risk of gambling-related harm. This approach would ensure privacy, maintain net neutrality principles, and provide a more effective means of combating gambling-related harm. DNS blocking should not be the primary strategy for addressing people affected by gambling-related harm, but rather alternative methods should be explored to achieve better results.

It is crucial to recognize the dangers associated with the online black market for individuals affected by gambling-related harm. Unregulated and illicit gambling websites not only lack the necessary safeguards to protect vulnerable individuals but can also perpetuate fraudulent practices and expose users to financial and personal risks. In contrast, a harm reduction strategy focused on promoting a safe and regulated gambling market offers a far more secure and accountable environment. By implementing effective regulatory measures and supporting legitimate platforms, we can provide individuals with the necessary protections, resources, and support they need to overcome their gambling-related challenges and ensure a safer gambling experience for all.

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