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Gambling Industry Organizations' Arguments to Influence Deregulation of State Online Monopoly in Finland: Analysis of X Data

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The **objective** of this study was to investigate gambling industry **organizations'** arguments on X (formerly Twitter), as a lobbying strategy to influence deregulation of the state online gambling monopoly in Finland. **Primary data** were collected on X between January and April 2023 from the Finnish Gambling Association (n=155 tweets). The X data were analyzed by coding using Microsoft Excel and by thematic content analysis using a framework developed by the researchers. The **results** identified six argument categories: (1) promotional content in the form of self-promotion, (2) licensing system will enable offshore gambling companies to be taxed, (3) the current gambling model does not succeed in competition, (4) political support for the licensing system from Members of Parliament, (5) using other countries' licensed models to advocate for the licensing system, and (6) licensing system will have a better chance to deal with gambling problems. The study **concluded** that X offered an opportunity for the Finnish Gambling Association to influence the deregulation of the state online gambling monopoly in Finland, which will be replaced with a licensing system from 2026 onwards.

Keywords: Gambling, Online Monopoly, Public Policy, Social Media, X (Formerly Twitter), Deregulation, Finnish Gambling Association, Finland.

Introduction

Since Finland joined the European Union (EU) in 1995, the Finnish state-controlled gambling monopoly and its compatibility with EU regulations have been questioned as offshore gambling and gambling problems have become major issues for public debate in Finland (Tammi et al., 2015). Globally, the gambling market was estimated at 759 billion USD in 2022, and is expected to grow to 876 billion USD by 2026 (Research and Markets, 2023). Much of the growth is currently taking place in online environments and in jurisdictions of the Global South (Sichali et al., 2023). The more established markets of the Global North, including the EU, focus more strongly on the regulation of the existing markets, the prevention of harm, maintaining a balance between profits and health risks, addressing the threat of offshore gambling industry, and adapting to change at different administrative levels (Reith et al., 2019). In the EU, gambling policy is regulated by multi-level requirements, including local, national, and institutions of the European Economic Area (EEA) (Aimo et al., 2024). Gambling within the EU falls under Article 49 of the Treaty on the Functioning of the EU on the freedom of services. This is contained in the rulings of the Court of Justice of the EU (CJEU), in which gambling is a form of economic activity under the European Community (EC) Treaty Article 2. The principle of the freedom of establishment (as defined in Articles 43 and 48 of the EC Treaty), prohibits the discrimination of companies established in other EU Member States (Swiss Institute of Comparative Law, 2006). Discriminatory measures can be justified if they fall under the exceptions provided in Articles 55 and 46 of the EC Treaty: public order, security, health, or public interest (Swiss Institute of Comparative Law, 2006). However, when the internal market has been regulated with legislative instruments, gambling services are typically excluded from the legislative instruments (Miettinen, 2022), because within the EU, gambling is regulated at the national level due to the absence of EC legislation (European Lotteries, 2004). The EU legal framework requires Member States to pursue evidence-based gambling policy which shows that the chosen regulations have a 'causal link' between restrictive gambling legislation and their justifications (Miettinen, 2022). The EC has also issued recommendations to Member States, particularly in regulating online gambling (European Commission, 2012, 2014, 2018), though the recommendations are non-binding and give Member States freedom on how they are applied (Marionneau et al., 2018).

The monopolistic structure of state-controlled gambling is being questioned on both national and international levels, because of increasing pressure of deregulation and harmonization policy in the EU, and a decrease in state interference in what is increasingly regarded as citizens' personal concern (Örnberg, 2006). Some EU Member States have imposed strict limitations on gambling activities in order to control and limit the supply of gambling and to ensure that the revenue of gambling is used for public benefit to some extent. Nordic countries have been under pressure to

deregulate as private operators have objected to the state monopolies in some jurisdictions, due to the common market policy in the EU (Bernitz & Kjellgren, 2002). The common market is defined as an area without inner borders, where free movement of goods, people, services, and capital is guaranteed. While, Great Britain and Austria have a fairly open gambling market with many operators and both countries are showing an interest in extending their market structure, Finland and the other Nordic countries are often presented as unique because of their strong emphasis on public-health protection and the exceptional role of the state in the regulation of gambling (e.g., Finland and Norway, which still have full state-controlled monopolies over their gambling industries) (Örnberg, 2006). So far, there is fairly little evidence on the use of social media, specifically X, as a lobbying strategy that gambling industry organizations might have used to influence deregulation of the state online gambling monopoly in Finland, though there is a fair amount of literature about the lobbying strategies that the alcohol industry used to liberalize the alcohol law in Finland (e.g., Sama et al., 2021). Social media, particularly X, has been identified as the most important communication application used by gambling industry actors to interact with followers and to advocate, lobby, and build interest groups and alliances, to weaken the state online gambling monopoly in Finland (Sama & Hiilamo, 2024). X has also been identified as a potentially rich data source openly accessible for researchers to study, and there has also been a recent increase in attention paid to gambling operators on X (e.g. GambleAware, 2019). (In this context, actors are interest groups with influence over the role of the industry, such as state monopolies who consider gambling as an important source of revenue for many social causes, good cause beneficiary organizations funded from gambling revenues like sports, culture, education, youth work and other social and health organizations, experts with knowledge on the negative social and health consequences of gambling, and public health advocates who seek to prevent the harmful effects of gambling (Sulkunen, 2018).

The aim of this study was to analyze how gambling industry organizations might have used social media, specifically, X, as a lobbying strategy, to influence deregulation of the state online gambling monopoly in Finland. Gambling regulation in Finland is based on state-controlled monopoly regulated by the Lotteries Act 1047/2001 (Ripatti & Koivula, 2024), which grants exclusive right to provide land-based and online gambling services in the country to the Finnish Government-owned betting agency (Veikkaus) (Veikkaus, n.d.). Based on the Act, foreign (private) gambling companies are forbidden from conducting gambling activities in Finland. However, the international gambling industry is growing worldwide, and has begun to demand deregulation and access to markets regulated by national monopolies (Tammi, 2008). The trend towards free movement of goods and services in the EU internal market and the global trends of the World Trade Organization (WTO), and the General Agreement on Trade in Services (GATS) that entered into force in 1995,

have strengthened the argument for deregulation (WTO, 2022). These influences and their counterforces such as the national interests defending regulation, have created a policy situation where gambling monopolies are under constant attack. Moreover, in the late 1990s, the Finnish state-controlled gambling monopoly experienced increased competition from foreign gambling companies like Centrebet, Expekt, Ladbrokes and Unibet that began to offer games on the internet (Tammi et al., 2015). Currently, several foreign gambling companies are offering gambling widely on the internet in Finnish (Männistö, 2021). In addition to the foreign gambling companies, there has been conflict with the Åland Islands gambling company (PAF) for marketing their games to the Finnish mainland (Tammi, 2014). Åland is a Swedish-speaking autonomous region of Finland and PAF, licensed by the Government of Åland, offers Finnish-language internet games to the Finnish mainland, and slot machine gambling on cruises from Finland to Sweden and Estonia, and vice versa.

A previous study (Sama & Hiilamo, 2024) suspected that foreign gambling companies operating on the Finnish online market (e.g., Betsson), hire content creators, actors, athletes, influencers, and consultants to lobby the public using X, in order to weaken the state online gambling monopoly in Finland for their commercial interests. This is not new because it is common for foreign gambling companies to use their affiliates or influencers on social media, to make their voices heard and for advertising (Lindeman et al., 2022). Gambling affiliates are third parties that are financially incentivized to attract new customers to a gambling operator, either through a one-off payment for getting a new customer to sign up, or a percentage of the revenue that customers provide the company (Lopez-Gonzalez & Tulloch, 2015). Some studies have shown that there is an increase in online gambling on unregulated sites owned by foreign gambling companies that do not pay taxes to the Finnish state, nor protect the consumers from harm, which is also weakening the state online gambling monopoly in Finland (Horner, 2022; YLE News, 2022; Sama & Hiilamo, 2024). Sama et. al. (2021) found three main arguments used as a lobbying strategy on X by the alcohol industry and actors aligning with it, to liberalize the Finnish alcohol law: (1) application of liberal alcohol policies generates more revenue, (2) liberties should be generally prioritized above bureaucracy and control, and (3) education about responsibility is the best solution to alcohol-related problems. Studying the social media arguments of gambling industry organizations in Finland on X, offer interesting avenues for comparison with other addiction industries' social media strategies like the alcohol industry. During the time of data collection for this study, the state online gambling monopoly in Finland was allegedly in the process of weakening state online monopoly (Horner, 2022). Finland is also preparing to adopt a gambling licensing system by 2026, with the aim to prevent and reduce economic, social, and health-related harms resulting from gambling, and to improve the channelling rate of the gambling system (Finnish Government, 2023, pp. 120–121). The

channelling rate refers to the amount of gambling that takes place using services regulated by national legislation and supervised by the national authorities. This study answers two research questions: (1) which are the gambling industry organizations using X as a lobbying strategy to influence deregulation of the state online gambling monopoly in Finland? and (2) What are the arguments used by the gambling industry organizations as a lobbying strategy on X to influence deregulation of the state online gambling monopoly in Finland?

Methods

Gambling regulation involves policy choices including what types of gambling are legal, who are authorized to provide them, under what conditions, how the harm caused by gambling is to be prevented or treated, and how the proceeds from gambling are to be re-distributed (Sulkunen et al., 2019). Regulatory choices are important since gambling is harmful to individuals, communities, and society (Langham et al., 2016; Marionneau et al., 2023). Policy approaches to gambling therefore vary across jurisdictions. Globally, international research on gambling regulations and policies has focused on availability, accessibility, structural and situational characteristics of gambling products (Auer & Griffiths, 2023), responsible gambling tools and pre-commitment, and regulatory regimes (e.g. monopolies and licences) (Velasco et al., 2021). Overall, there has been more focus on public health-oriented regulations that target the provision of gambling (e.g. Livingstone, 2019; Sulkunen et al., 2019; Velasco et al., 2021) like restrictions on the availability and accessibility of gambling. While acknowledging the role of public health and other actors, this study focused mainly on gambling industry organizations for three reasons: first, to date, no study has researched gambling industry organizations in Finland and their lobbying arguments on social media, specifically, X, including the use of specific features like links, hashtags and tagging within posted content to increase visibility on the X platform. Therefore, X, was also chosen over other applications for this reason. Second, so far, there is fairly little evidence on the use of social media, specifically X, as a lobbying strategy that gambling industry organizations might have used to influence deregulation of the state online gambling monopoly in Finland, though there is a fair amount of literature about the lobbying strategies that the alcohol industry used to liberalize the alcohol law in Finland (e.g., Sama et al., 2021). Third, we wanted to shed light on how gambling industry organizations may influence deregulation of the state online gambling monopoly in Finland. Our approach was to analyze the arguments used by gambling industry organizations to influence deregulation policy of the state online gambling monopoly in Finland. This approach is in the context of corporate political activity (CPA) (Bhuptani et al., 2022) undertaken by gambling industry organizations in their campaign to open up monopolies for commercial interests, as in similar gambling

industry (e.g., Sama & Hiilamo, 2024) and alcohol industry studies (e.g., Sama et al., 2019).

A quantitative approach was selected for this study because the study needed data from X for statistical analysis. The data collected for this study were divided into primary and secondary data. Primary data were collected retrospectively through quantitative method from the social media application, X, between January and April 2023, and from content posted between August 2020 and March 2023. Based on previous literature (Sama & Hiilamo, 2024) and an exploration of X, we identified one gambling industry organization of interest. The obvious choice was the Finnish Gambling Association (FGA) (Suomalainen Rahapeliyhdistys ry). The FGA was registered in 2022 (Finland's Customer Information Register [Suomen Asiakastieto Oy], 2022) as an independent, non-profit organization, with the aim to actively participate in the development of the gambling industry in Finland, through the sharing of information and promoting discussion on sustainable and responsible gambling practices in the country (Ripatti, 2023). The FGA participates in public discussions on social media using X, which is the focus of this study. However, the FGA does not have an X account in its name, but rather, the tweets under the name of the FGA are administered under the X account of the Chairman of the Board of the FGA. The Chairman of the Board of the FGA is a former employee of Veikkaus, who worked for 25 years in a dozen of high strategic positions in Veikkaus, before resigning in Spring 2020 (Forsblom, 2023). The Chairman has also co-founded his own private-profit limited company in 2020, together with a former colleague in Veikkaus, called the Finnish Gambling Consultants (FGC) (Finnish Gambling Consultants, 2020). Similarly, the Vice Chairwoman of the FGA has also founded her own private-profit limited law firm specialized in gaming, registered in April 2020, called 'Law Firm Legal Gaming Oy' (Finland's Customer Information Register [Suomen Asiakastieto Oy], 2020). However, the FGC, the Vice Chairwoman of the FGA and 'Law Firm Legal Gaming Oy' are outside the scope of this study because there were no tweets under their names to influence deregulation of the state online gambling monopoly in Finland. No other gambling industry organization or foreign gambling companies were found on X directly or indirectly influencing deregulation of the state online gambling monopoly in Finland. We assume this could be because Veikkaus has exclusive right to provide land-based and online gambling services in Finland as the sole state monopoly operator, and foreign gambling companies are forbidden from conducting gambling activities in Finland (Ripatti & Koivula, 2024). All the foreign gambling companies found on X were merely marketing their gambling products to target Finnish consumers as in previous studies (e.g., Männistö, 2021). The X account of the Chairman of the Board of the FGA had 2,100 followers as of April 2023 when the X data collection for this study was completed. The followers of the X account vary significantly from people representing different segments of Finnish society including, activists advocating for

deregulation of the state online gambling monopoly in Finland, journalists, lawyers, economists, entrepreneurs, professional Finnish gamblers, advocates of gambling harm prevention and responsible gambling, researchers, politicians like Members of Parliament (MPs) in Finland, gambling companies like Veikkaus and PAF, and foreign gambling companies like ComeOn.

The X data were collected retrospectively and manually by searching for relevant tweets from the X account, then filtering and writing them for coding. Specifically, the Principal Investigator (PI) manually scrolled down the timeline of the X account until every tweet to influence deregulation of the state online gambling monopoly in Finland, was collected and written down for coding. The period between August 2020 and March 2023 for the tweets' collection was purposefully selected because it was during this period that the Chairman of the Board of the FGA began tweeting under the name of the FGA, to influence deregulation of the state online gambling monopoly in Finland, after he had resigned from Veikkaus. This is also prior to the National Coalition Party (NCP)-led government program as of June 2023, which advocates for the licensing of the Finnish state online gambling monopoly by 2026 (Finnish Government, 2023, p. 120 -121). All the tweets were in Finnish language but were translated into English language for coding and analysis because this study has been done for publication in English language. Only direct tweets from the Chairman of the Board of the FGA under the name of the FGA were collected for analysis, excluding retweets because retweets were not part of the scope of this study. Meanwhile, secondary data were collected for this study through qualitative method from prior literature, journal articles, news articles and websites using search terms like 'gambling and monopoly', 'gambling and Finland', and 'social media and X (formerly Twitter)'. The search term pairs were used as default search settings in some databases like EBSCOhost, PubMed, ProQuest, Scopus, Web of Knowledge and Google Scholar. Given the scarcity of peer-reviewed literature in the field, grey literature in English, Finnish or Swedish languages such as internet articles, blog posts, newspaper articles and reports were included in the secondary data. Secondary data in other languages were translated into English language. The secondary data were collected in the course of this study including the same timeframe as the primary data. The secondary data were used to comment, interpret, contextualize and analyze the primary data from X.

Since research using X data is relatively novel and there are no established or consistent methods across the few studies that are available (e.g., Gainsbury et al., 2015b; Gainsbury et al. 2016; Houghton et al. 2019), the PI and co-author coded all the tweets collected for this study by developing a coding template using a summative approach (Hsieh and Shannon, 2005). The approach involved identifying and quantifying the keywords or content in the X data, to explore their contextual usage. The quantification approach focused on counting the frequency of the keywords

or content (Kondracki & Wellman, 2002). During this process, categories and variables (arguments) used in previous studies of a similar nature (i.e., Thomas et al. 2015) were adapted to suit the characteristics and aims of the present study. These were utilized when a coding sheet was created. For the present study, six main categories of investigation were identified. Each category had a series of different arguments which were applied to it, and a coding framework was developed. The X data were analyzed using qualitative-quantitative thematic content analysis (Elo & Kyngäs, 2008; Treiman, 2014). In the thematic content analysis (DeSantis & Ugarriza, 2000), the X data were explored to identify common threads that extend across the data. For the quantitative content analysis, the interest was in the frequency of different categories of the tweets. Each tweet was categorized into one argument category though some tweets included several categories. In such cases, the tweets were contextualized. Although the Principal Investigator (PI) collected all the tweets, the coding of the tweets was done by the PI and co-author within each argument category under the framework that both developed, after discrepancies had been discussed between them and agreement reached on the tweets that were collected for analysis. The X data were analyzed using Microsoft Excel for statistical frequency. Only arguments directly relating to the influence of deregulation of the state online gambling monopoly in Finland were analyzed. In the framework of the analysis as in previous studies (e.g., Sama & Hiilamo, 2019), "strategies" describe the main categories/themes of arguments in the tweets coded under them, whereas "arguments" within the strategies describe the reasons given by the gambling industry organization to influence deregulation, as in previous studies on alcohol industry (e.g., Sama & Hiilamo, 2019) (see Table 1, for the coding list). In this study, X is used as the FGA's social media strategy and the strategies have different argument categories to influence deregulation of the state online gambling monopoly in Finland**.**

Table 1: Coding list of strategies, sample tweets, example of arguments tweeted, number of tweets and percentage share of tweets in descending order by the Finnish Gambling Association between August 2020 and March 2023.

No.	Strategies/Sample tweets	Example of arguments	Number of tweets	Share (%)
1.	Promotional content in the form of self-promotion. "It's great that there is so much interest in the Finnish market during the three days I conducted interviews, gave a keynote presentation and moderated the CEO panel discussion."	- It's great that there is so much interest in the Finnish market during the three days I conducted interviews, gave a keynote presentation and moderated the CEO panel discussion. - I appreciate that my ex-boss @OlliSarekoski tells things like they are. The monopoly is at the end of the road, soon to be replaced by a licensing system. - My old employer Veikkaus is in the middle of big changes. The company is now doing the right things to prepare for the future licensing system by improving management with the recruitment of four new staff, three of whom are from outside Veikkaus, and getting rid of unprofitable operations. Ex-colleagues miss these.	35	22.6%

2	Licensing system will enable offshore gambling companies to be taxed. "Veikkaus' digital market share has dropped to close to 50% due to online gambling flows to foreign operators who do not pay taxes to the Finnish State and do not finance the prevention and treatment of gambling harm. The profits flow abroad, but the disadvantages remain in Finland. With the licensing system, all operators would be subject to the same regulation and would pay lottery tax and license fees on their winnings."	- Veikkaus' digital market share has dropped to close to 50% due to online gambling flows to foreign operators who do not pay taxes to the Finnish State and do not finance the prevention and treatment of gambling harm. The profits flow abroad, but the disadvantages remain in Finland. With the licensing system, all operators would be subject to the same regulation and would pay lottery tax and license fees on their winnings. - Finns play more and more abroad causing us to lose money, but gaming problems are not decreasing. The preparation of the licensing system must start immediately. We hope that the current government would set up a working group, and not wait for the elections.	34	21.9%
3	The current gambling model does not succeed in competition. "The current gambling model does not succeed in competition due to increasing digitalization."	- The current gambling model does not succeed in competition due to increasing digitalization. - Veikkaus has started preparation to change the online monopoly into a licensing system by recruiting new directors and shutting down own arcades and casinos because of falling revenues. - What to do about the declining gaming revenues? The answer is probably the same as elsewhere in Europe. The Finnish digital market should be opened to the licensing system, in which case, the license fees of foreign operators will compensate for the decrease in Veikkaus' revenues. - Illegal gambling activities are heavily marketed on the internet and social media by offshore companies to target Finns. - The European Gaming and Betting Association, the Finnish Competition and Consumer Authority and PAF, were also in favour of the licensing system in Finland because Veikkaus has lost its competitiveness in the digital market to offshore companies	32	20.7%
4	Political support for the licensing system from Members of Parliament. "*An MP from the Left Alliance* Party stated that a change in the gambling system is possible, but it needs to be analyzed very carefully."	- *An MP from the Left Alliance* Party stated that a change in the gambling system is possible, but it needs to be analyzed very carefully. - *An MP from the SDP* admitted that he firmly supported Veikkaus' monopoly, but the new information that came out this year, e.g., the decreasing Veikkaus' profits and digital market share, have made the party to start an investigation into changing the system. - Though preparation of the gambling legislation still awaits the decision of the Minister of Interior, MPs at the event were confident that the new system will be valid in 2026 and so let us hope for good preparation and the law. - *An MP from the NCP* said that his party supports the transition to the licensing system. The party has been in contact with the SDP and have asked the Prime Minister's	25	16.1%

		Office to set-up a working group to prepare the new gambling system as soon as possible.		
5	Using other countries' licensed models to advocate for the licensing system. "Finland can learn from Holland where game companies that were deemed to have violated the previous legislation did not get a license right away"	- Finland can learn from Holland where the licensing system finally came into force last October. Game companies that were deemed to have violated the previous legislation did not get a license right away. Could this be our future? - In Sweden, advertising decreased when the licensing model was switched to. The Italian licensed model has a ban on advertising. The gambling system does not directly affect the marketing volume. In Finland, we need to build a system that suits us best, which is no longer the current one. - The general levels of gambling problems in the licensed countries of Denmark and Sweden, are lower than in the monopoly countries of Finland and Norway. So, the monopoly does not seem to reduce gambling problems though the Swedish system could be improved. - The Swedish licensed model is working well, state gambling revenues are growing, former monopoly companies are succeeding, more than 90% of gambling is covered by Swedish regulation which has significantly improved the legal protection of the players. - Sweden's gambling marketing and other restrictions apply to all licensed companies. Spelpaus' (Swedish gambling's centralised self-exclusion system) game bans also apply to all companies. Fines imposed by the supervisory authority and the threat of fines are for all companies, the same situation in Denmark for 10 years already. Finland can learn from these.	15	9.7%
6	Licensing system will have a better chance to deal with gambling problems. "Licensing system would protect the players from harm under Finnish regulatory framework."	- Licensing system would protect the players from harm under Finnish regulatory framework. - With the licensing model, a larger part of the gambling problems would be covered by Finnish regulation than at present, in which case, the authorities would have a better chance to deal with gambling problems. At the moment, supervision does not reach a large part of offshore companies and it is poorly resourced. - A functioning licensing system requires a strong and independent supervisory authority. Sufficient resources must also be allocated for the prevention and rehabilitation of gambling problems.	14	9.0%
		Total Tweets	155	100%

Results

The (n = 155 tweets/100%) collected for analysis in this study were coded into six argument categories developed by the researchers in descending order of frequency: (1) promotional content in the form of self-promotion (n = 35 tweets/22.6%), (2) licensing system will enable offshore gambling companies to be taxed (n = 34 tweets/21.9%), (3) the current gambling model does not succeed in competition (n = 32 tweets/20.7%), (4) political support for the licensing system from Members of Parliament (n = 25 tweets/16.1%), (5) using other countries' licensed models to advocate

for the licensing system (n = 15 tweets/9.7%), and (6) licensing system will have a better chance to deal with gambling problems (n = 14 tweets/9.0%) (see Table 1, for the coding list).

(1) Promotional content in the form of self-promotion.

Our results indicate that, "promotional content in the form of self-promotion" was the first and most prominent category frequently tweeted under the name of the FGA to advocate for the licensing system in Finland. The number of tweets in this category was 35 representing 22.6% of all the tweets. The use of links, hashtags and the tagging of other accounts were frequently used by the FGA to post promotional content in order to increase visibility on the X platform within posted messages, and to interact with their followers. For example, after the FGA had gathered politicians and other stakeholders to discuss about gambling deregulation policy in Finland at a specific location, the FGA used hashtags like '#gambling' and '#igaming' and tags of other gambling companies like '@pafdotcom', '@ABtravochgalopp', '@Veikkaus' and '@oddset', to post promotional content in the form of self-promotion as in quote: "*It's great that there is so much interest in the Finnish gambling market during the three days I conducted interviews, gave a keynote presentation and moderated the Chief Executive Officer (CEO) panel discussion*". Additionally, the FGA posted promotional content in the form of self-promotion using the hashtags '#monopoly' and '#licensing system' and tags as in quote: "*I appreciate that my ex-boss* @OlliSarekoski *tells things like they are. The monopoly is at the end of the road, soon to be replaced by a licensing system.*" Further, the FGA posted promotional content in the form of self-promotion using the hashtag '#veikkaus' as in quote: "*My old employer, Veikkaus, is in the middle of big changes. The company is now doing the right things to prepare for the future licensing system by improving management with the recruitment of four new staff, three of whom are from outside Veikkaus and getting rid of unprofitable operations. Ex-colleagues miss these.*"

(2) Licensing system will enable offshore gambling companies to be taxed.

A total of 34 tweets from the FGA, representing 21.9% of all the tweets in this second category, argued that "licensing system will enable offshore gambling companies to be taxed." For example, a tweet emphasized on Veikkaus' falling digital market share to foreign operators as in quote: "*Veikkaus' digital market share has dropped to close to 50% due to online gambling flows to foreign operators who do not pay taxes to the Finnish State and do not finance the prevention and treatment of gambling harm. The profits flow abroad, but the disadvantages remain in Finland. With the licensing system, all operators would be subject to the same regulation and pay lottery tax and license fees on their winnings.*" Another tweet emphasized how Finns gamble more and more abroad causing Finland to lose money using the hashtag '#gaming problems' and

tags of politicians and political parties like the National Coalition Party (NCP) as in quote: "*Finns play more and more abroad causing us to lose money, but gaming problems are not decreasing. The preparation of the licensing system must start immediately. We hope that the current government would set up a working group and not wait for the elections.*"

(3) The current gambling model does not succeed in competition.

In this third category, with 32 tweets representing 20.7% of all the tweets, the FGA argued that "the current gambling model does not succeed in competition." For example, a tweet argued as in quote: "*The current gambling model does not succeed in competition due to increasing digitalization. Veikkaus may think digital competition does not concern them because the company has a monopoly on lottery games. That kind of thinking has not been very harmful in a situation where the sale of lottery games has taken place in the retail channel because the customers have faced only a few other gambling offerings. However, the digitalization of gambling and the change in customers' consumption behaviour have changed the situation dramatically.*" For that reason, another tweet using the hashtag '#veikkaus', argued as *in quote: "Veikkaus has started preparation to change the online monopoly into a licensing system by recruiting new directors and shutting down own arcades and casinos because of declining revenues to offshore operators."* Additionally, another tweet using the hashtag '#veikkaus', argued as in quote: "*What to do about the declining gaming revenues? The answer is probably the same as elsewhere in Europe. The Finnish digital market should be opened to the licensing system, in which case, the license fees of foreign operators will compensate for the decrease in Veikkaus' revenues.*" Further, a tweet emphasized the role of illegal gambling as in quote: "*Illegal gambling activities are heavily marketed on the internet and social media by offshore companies to target Finns which was detrimental for the state online monopoly.*" Last, a tweet using the hashtags '#igaming' and '#Finland', argued as in quote: "*the European Gaming and Betting Association, the Finnish Competition and Consumer Authority and PAF, were also in favour of the licensing system in Finland because Veikkaus has lost its competitiveness in the digital market to offshore companies.*"

(4) Political support for the licensing system from Members of Parliament.

In this fourth category with a total of 25 tweets representing 16.1% of all the tweets, the FGA argued that there was political support for the licensing system from MPs in Finland. For example, a tweet argued as in quote: "*An MP from the Left Alliance Party stated that a change in the gambling system is possible, but it needs to be analyzed very carefully.*" Another tweet argued that there was political support for the licensing system from MPs of the Social Democratic Party (SDP) as in quote: "*An MP from the SDP admitted that he firmly supported Veikkaus'*

monopoly, but the new information that came out this year, e.g., the decreasing Veikkaus' profits and digital market share, have made the party to start an investigation into changing the system." Additionally, a tweet using the hashtag '#igaming', argued that MPs were confident at an event organized by the FGA as in quote: "*Though preparation of the gambling legislation still awaits the decision of the Minister of Interior, MPs at the event were confident that the new system will be valid in 2026 and so let us hope for good preparation and the law*". Last, a tweet argued for an MP of the NCP as in quote: "A*n MP from the NCP said that his party supports the transition to the licensing system. The party has been in contact with the SDP and has asked the Prime Minister's Office to set-up a working group to prepare the new gambling system as soon as possible.*"

(5) Using other countries' licensed models to advocate for the licensing system.

In this fifth category, a total of 15 tweets from the FGA representing 9.7% of all the tweets used other countries' licensed models to advocate for the licensing system in Finland. For example, using the hashtags '#gambling' and '#license system', a tweet argued that Finland can learn from the licensed model in Holland as in quote: *"Finland can learn from Holland where the licensing system finally came into force last October. Game companies that were deemed to have violated the previous legislation did not get a license right away. Could this be our future?"* Another tweet, using the hashtag '#rahapeli' (gambling), argued that Finland can learn from the licensed models in Sweden and Italy concerning advertising as in quote: "*In Sweden, advertising decreased when the licensing model was switched to. The Italian licensed model has a ban on advertising. The gambling system does not directly affect the marketing volume. In Finland, we need to build a system that suits us best, which is no longer the current one.*" Additionally, using the hashtag '#gambling problem', a tweet used the licensed models in Denmark and Sweden to advocate for the licensing system in Finland as in quote: "*The general levels of gambling problems in the licensed countries of Denmark and Sweden, are lower than in the monopoly countries of Finland and Norway. So, the monopoly does not seem to reduce gambling problems though the Swedish system could be improved.*" Further, using the licensed model in Sweden and the hashtag '#marketing' and tagging '@PAF', a tweet advocated for the licensing system in Finland as in quote: "*The Swedish licensed model is working well, state gambling revenues are growing, former monopoly companies are succeeding, more than 90% of gambling is covered by Swedish regulation which has significantly improved the legal protection of the players.*" Last, using the licensed models in Sweden and Denmark, a tweet advocated for the licensing system in Finland as in quote: "*Sweden's gambling marketing and other restrictions apply to all licensed companies. Spelpaus' (Swedish gambling's centralised self-exclusion system) game bans also apply to all companies. Fines imposed by the supervisory authority and the threat of*

fines are for all companies, the same situation in Denmark for 10 years already. Finland can learn from these."

(6) Licensing system will have a better chance to deal with gambling problems.

In this last category, a total of 14 tweets from the FGA representing 9.0% of all the tweets, argued that "licensing system will have a better chance to deal with gambling problems." For example, a tweet argued as in quote: "*Licensing system would protect the players from harm under Finnish regulatory framework.*" Another tweet argued that licensing system would cover a larger part of the gambling problems in Finland as in quote: "*With the licensing model, a larger part of the gambling problems would be covered by Finnish regulation than at present, in which case, the authorities would have a better chance to deal with gambling problems. At the moment, supervision does not reach a large part of offshore companies and it is poorly resourced.*" Last, a tweet argued that a functioning licensing system requires a supervisory authority as in quote: "*A functioning licensing system requires a strong and independent supervisory authority. Sufficient resources must also be allocated for the prevention and rehabilitation of gambling problems.*"

Discussion

The aim of this study was to identify the gambling industry organizations using X as a lobbying strategy to influence deregulation of the state online gambling monopoly in Finland, and the arguments used by the gambling industry organizations as a lobbying strategy. The results have identified the FGA as the main gambling industry organization using X as a lobbying strategy, to influence deregulation of the state online gambling monopoly in Finland. The results indicate that the FGA influenced deregulation using "promotional content in the form of self-promotion." The FGA also used arguments like "licensing system will enable offshore gambling companies to be taxed" and "the current gambling model does not succeed in competition" as lobbying strategies. We found that these arguments were not misinformation or disinformation because there were evidence in previous studies to support them (e.g., Sailas et al., 2023; Sama & Hiilamo, 2024). Our results indicate that political support for the licensing system from Members of Parliament in Finland, was used as a lobbying strategy by the FGA to influence deregulation of the state online gambling monopoly in Finland. The results confirm Sama et al.'s (2021) work on the alcohol industry; which is to say that gaining access to political decision makers with the same ideological convictions, was an important FGA's strategy to influence deregulation policy in Finland. As of June 2023, the NCP-led government program in Finland also advocates for the licensing of the state online gambling monopoly, to prevent and reduce economic, social, and health-related harm resulting from gambling and to improve the channelling rate of the

gambling system (Finnish Government, 2023, pp. 120–121). We found no evidence of donations to politicians who supported the commercial interests' approach of the FGA. Previous studies indicate that unhealthy commodity industries (UCIs) like the alcohol, tobacco and sugar-sweetened beverage industries forged direct or indirect partnerships with government agencies to share information because in addition to political interests, they shared common business interests (Hiilamo, 2003; Hoe et al., 2022). Such partnerships advance the commercial interests of UCIs rather than public health interests because UCIs merely promote policies that fail to reduce harms, such as those caused by gambling (Wardle et al., 2019). Our results indicate that by using lobbying strategies like "other countries' licensed models to advocate for the licensing system" and "licensing system will have a better chance to deal with gambling problems," the FGA helped to shape perceptions as to what is needed for gambling reform in Finland such as opening the state online monopoly for competition through a licensing system, rather than approaches that will tighten regulation to maintain the monopoly system (e.g., maximum loss-limit, player-tracking, self-exclusion register) (Newall & Swanton, 2024). These are consistent with previous studies on alcohol and gambling industries (e.g., Jernigan, 2012; Martino et al., 2017; Sama et al., 2021; Sama & Hiilamo, 2019, 2024), which have sometimes conflicted with public health interests (van Schalkwyk et al., 2021). As of June 2023, the NCP-led government program has adopted some of the FGA's arguments to license the state online monopoly by 2026 (Finnish Government, 2023, pp. 120–121).

The tweets in this study were made by a single individual under the name of the FGA, and the tweets were unique and did not emerge or evolve in response to those made by public health advocates or other actors. Therefore, we could not identify which counter-arguments were used to oppose the FGA's lobbying activities. To the authors' knowledge, the current study entailed the first attempt to quantify this type of content posted by the FGA on X, to influence deregulation of the state online gambling monopoly in Finland. No research has also examined how gambling industry organizations in Finland utilize specific features on X including the use of links, hashtags and the tagging of other accounts to increase visibility on the platform within posted messages, in comparison to other social media platforms like Facebook (e.g. Männistö, 2021). We do not know who founded the FGA and if the tweets were made formally on behalf of the FGA, or if they were just the views of the single individual who presumably posted them. We do not also know if the FGA is part of a proxy for, or an agent or an affiliate of the gambling industry because we found no evidence to support that. However, previous studies indicate that there has been little attention given to the role of gambling affiliates in the marketing of gambling on social media (Lopez-Gonzalez & Tulloch, 2015). Gambling affiliates' accounts on social media are presented as accounts where individuals can receive sports news and special gambling offers or tips on

suggested bets, though affiliates also post direct links to place specific bets or to sign up to specific bookmakers. If an individual chooses to follow the link and spends money with that gambling operator, the affiliate is financially rewarded. Therefore, whilst gambling operators are the companies with whom an individual partakes in a gambling activity, an affiliate is a company which actively looks to bring customers to a gambling operator. Miller et al. (2016) indicate that there were over twice the number of affiliate accounts compared to gambling operators' on X, and the largest community of gamblers on X generally followed affiliates and tipsters as opposed to bookmakers. We did not find any lobbying content posted on X by foreign gambling companies to influence deregulation in Finland though some of them were likely to benefit from the deregulation. This maybe due to the fact that Finland has a state-controlled gambling monopoly regulated by the Lotteries Act 1047/2001 (Ripatti & Koivula, 2024), which prohibits foreign operators from conducting gambling activities in Finland, otherwise they will be punished under the Criminal" Code (Police of Finland, n. d.). The use of hashtags and tagging of other accounts to increase visibility within posted content, emerged in this study as an important tactic for influencing deregulation by the FGA. A previous study found that tweets were more likely to be retweeted if they contain hashtags and as such, the actor would be spreading their message to a broader audience and increasing the interactivity of the tweets (Suh et al. 2010). Hashtags denote a specific topic for users to participate in or follow the online conversation, and it also links tweets to the wider X audience (Killick & Grifths, 2019). By using these elements, the FGA placed their tweets in broader meaningful contexts, linking them to a politician, a political party, or a gambling company. As hashtags and account tagging were common in the data, it is natural that many tweets mentioned external agents like politicians, political parties and gambling companies. The tendency to mention external agents in the tweets was high over the studied period as in previous studies (e.g., Bradley et al., 2019). Our results indicate that the FGA successfully engaged in CPA (Bhuptani et al., 2022) to influence deregulation by shaping the evidence base with citations like the "50%" drop in the digital market share of Veikkaus. We found that the citations were not misinformation or disinformation because there were evidence in previous studies to support them (e.g., Sailas et al., 2023; Sama & Hiilamo, 2024).

The gambling policy in Finland and other Nordic countries are often presented as unique because of the strong emphasis on public-health protection, and because of the exceptional role of the state in the regulation of gambling (e.g., Finland and Norway, which still have full state monopolies over their gambling industries) (Örnberg, 2006). Globally, the gambling industry's involvement in policy-making is not new, and there has been a recent increase in the industry's efforts to be seen as a key partner in policy-making (Sulkunen et al., 2020), though no study has focused on gambling industry organizations like the FGA. Our results indicate that the FGA used the proportion of online gambling that is currently unlicensed as

a major argument to influence deregulation, whereas previous studies (e.g., the United Kingdom) indicate that this argument might not go away after the deregulation in Finland because in the United Kingdom, gambling operators constantly use scaremongering arguments like the "black market" or "harm prevention" to influence other stakeholders (Wardle et al., 2021). Our results add to the evidence of CPA by gambling industry organizations, and demonstrate a great similarity in the arguments used to influence deregulation by the alcohol industry (Sama et al., 2021; Sama & Hiilamo, 2019, 2024). Our results also shed light on a gambling industry organization's lobbying strategies to influence deregulation in Finland, as no previous study of this nature had been done in Finland. Overall, our results indicate that the FGA used arguments that were similar to those of the alcohol industry to influence deregulation (Sama and Hiilamo, 2019). We conclude that X offered an opportunity the FGA used to influence deregulation of the state online gambling monopoly in Finland, to the point where the NCP-led government has decided to replace the monopoly with a licensing system by 2026 (Finnish Government, 2023, pp. 120–121).

Strengths and limitations

The main strength of this study is that it provides a broad overview of the arguments used by the FGA to influence deregulation in Finland. The study's attempt to categorize the FGA's strategies and arguments suggest that the findings may be applicable to other UCIs like the alcohol and tobacco industries. Since this study discusses CPA undertaken by the FGA in its campaign to open up the state online gambling monopoly in Finland, another strength of this study is that it represents a contribution to the literature on CPA by gambling industry organizations and perhaps that of the Commercial Determinants of Health (CDoH) (Hancock et al., 2018; de Lacy-Vawdon & Livingstone, 2020). This study also contributes to how gambling industry organizations may promote their own CPAs using X features like links, hashtags and the tagging of other accounts to increase visibility on the platform within posted messages, and to interact with their followers. However, this study also has a number of limitations: First, one methodological weakness is that reliability was not maximized for all the findings which may affect the validity of the results. This was due to the lack of established frameworks which fit the approach of this study (e.g., thematic analysis, content analysis). Second, because the X data were collected retrospectively, it is important to note that tweets remaining may not represent the initial number of tweets posted (e.g., tweets may have been deleted prior to data collection). Third, the X data analyzed in this study were mostly in Finnish language for the Finnish speaking country of Finland, but were translated into English language which may have somewhat limited the extent of our analysis. Also, some of the secondary data used in this study were in Finnish and Swedish languages, but were translated into English language which may have somewhat limited the extent of our analysis. Fourth, the arguments of the FGA in this study were

unique and did not emerge or evolve in response to those made by public health advocates or other actors because we thought these would be reserved for future studies. Therefore, we could not identify which counter-arguments were used to oppose the FGA's lobbying activities.

Fifth, we have no information on the intentions behind the X activities of the FGA or evidence to explain how their X account is managed, or how the contents are developed. We do not also know if the tweets were made formally on behalf of the FGA or if they were just the views of the single individual who presumably posted them. We therefore assume that the content of the tweets is a reflection of the aims and values of the FGA as opposed to the individual who presumably posted them. Sixth, we did not have access to internal FGA's documents that might have shed light on the arguments and strategies identified in this study, including directly or indirectly targeting politicians. Seventh, the data collected for this study were centered upon one main gambling industry organization, the FGA. Therefore, the results are not generalizable to other organizations. Eighth, the identification of arguments and the jurisdictions in which they are used by the FGA as a lobbying strategy, are based on the X data that were collected and analyzed. Closely related to this is the fact that the results focused mainly on the deregulation policy of the FGA, whereas the FGA may use a more diverse set of arguments in other policy areas. Nineth, there might be some overlap in the arguments because some arguments belong to more than one strategy, though all the arguments have been contextualized. Tenth, the results of this study have been anonymized to protect the identities of the actors such as the use of 'chairman' and 'chairwoman' instead of their real names. Finally, X was the only social media application studied, which limits the generalizability of the results to other applications.

Implications for policy, practice, and future research

This study has identified the FGA as the main gambling industry organization using X as a lobbying strategy, to influence deregulation of the state online gambling monopoly in Finland. This study has also identified six argument categories used on X by the FGA as a lobbying strategy, to influence deregulation in Finland. Therefore, this study may be useful to policy-makers, public health and other stakeholders who wish to understand how the FGA may influence deregulation of the state online gambling monopoly in Finland using X. The arguments and strategies identified in this study may also be useful to stakeholders in Finland and elsewhere, who are attempting to counter efforts by the FGA to influence deregulation. This study has further developed the framework of Hsieh and Shannon (2005), and Thomas et al. (2015) for classifying CPAs by gambling industry actors. Future research could apply this framework to other industries such as the alcohol industry or in policy-making. The results of this study have highlighted some areas for future research. Future research could investigate what type of content is posted on X by FGA's affiliates (e.g., the Finnish Gambling Consultants and the Law Firm Legal Gaming Oy), given

the uncertainty surrounding gambling consumers' ability to recognize affiliates on social media like X. Future research could also investigate the role of public health actors during the same period in influencing policy-making in Finland. Finally, future research could investigate how interacting with the content of the FGA on X, impacts upon gambling attitudes, intentions and behaviour. This may be particularly relevant to look at within at-risk populations, given that at-risk gamblers and problem gamblers report increased levels of gambling and gambling problems as a result of social media promotions (Gainsbury et al., 2016). Through interviewing at-risk gamblers, a clearer understanding will be formed on how social media like X, is used by gamblers and what role it plays within a gambler's life relevant to other gambling influences.

Statement of Competing Interests
The authors declare no competing interests with respect to this research, authorship, and/or publication of this article.

Relative Contribution
Dr. Thomas Babila Sama, PhD (10/2012), (Social Sciences – Social and Public Policy) is a Postdoctoral Researcher in Social and Public Policy and is currently employed by the Unit of Social and Public Policy, University of Helsinki, Finland, where this project was carried out. Dr. Sama has extensively studied gambling research in Finland and Sweden, and has worked on several research projects as Postdoctoral Researcher and Principal Investigator (PI). He was the PI of this study and wrote the background of the study, collected the secondary and X data, and together with the co-author, analyzed and interpreted the data and reported the results as the first author of the research article manuscript.

Professor Heikki Hiilamo, PhD, (Social Sciences, Social and Public Policy) is Professor of Social and Public Policy and is currently employed by the Unit of Social and Public Policy, University of Helsinki, Finland, and the Finnish Institute for Health and Welfare. Hiilamo has extensively studied gambling research projects and has led several research teams. As the supervisor of this study, he was involved in drafting the article manuscript for publication, analyzing the results together with the PI, revising the manuscript critically for intellectual content and approving the final version to be published as co-author. Both authors agree to be accountable for all aspects of the work.

Ethics Approval
Ethics Approval for this study is non-applicable (N/A)

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Declarations

My co-author, Hiilamo, has no declarations to make since he was the supervisor of the study and did not receive any funding.

Research Promotion

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