EC / IRIS - ESTONIA

SEMINAR “FIGHT AGAINST MATCH FIXING”

Date: 8 April 2014
Place: Tallinn (Estonia)
Participants: cf. appendix

Main issues raised during the seminar:

Level of match fixing risk and awareness:

- The match fixing risk in Estonia is considered by the participants as quite low (even if some participants think it is quite high);
- There seems to be a quite good level of awareness about match fixing in Estonia.

Who has to fight against match fixing?

- In Estonia, public authorities strongly respect the autonomy of sports organisations.
- Nevertheless, the sports movement seems to be ready to accept public intervention in case of public order risks (for instance intrusion of organised Crime within sports structures).
- A first match fixing case in football has been referred to the Estonian Court. 11 people are involved. The process of this match fixing case looks quite similar to other famous cases (the Bochum case for instance):
  - Organized Crime is involved;
  - There were complex links between people from Asia, Russia and Estonia;
  - Bets are placed in Asia through illegal operators based in the Philippines (like SBOBet).
- The idea of developing new strong measures to protect sports integrity and to share information in a national cooperative way is considered important by all participants.
- Estonia (Ministry of Finance) takes part to the debates on the EPAS convention to fight against match fixing and expressed strong support to the project.

Sports betting:

- Some participants had a correct level of expertise in betting.
- In Estonia, there is a system of licences for (offline and online) betting.
- Less than 10 operators have a betting license in Estonia (Triobet, Unibet, Spordiennustus, etc.).
- Under the Gambling Act 2009, online gambling organisers’ servers are to be located in Estonia.
In Estonia, fight against illegal betting seems to be quite efficient. There are two main reasons for that situation:
- The State implemented strict measures, including the set up of a black list, IP blocking, advertising ban and even payment blocking. According to the Law, payment-processing providers are prohibited from transferring payments to operators not licensed by Estonian authorities (not yet been enforced);
- Estonia is a quite small country (population: 1.4 million) with a specific language and culture. It is therefore not a main target for betting operators.

Measures to protect sports integrity:

- Participants give overwhelming support to education and information measures.
- Some participants confirmed that many sports actors are now approached through social platforms (Facebook, Twitter, etc.). Reporting approaches needs a clear procedure according to many participants.
- Football has already set up a very complete prevention and information programme, targeting players, referees, sports leaders, etc. (all the first leagues’ players receive an annual training on this issue). The Estonian Football Federation is considered as a best practice regarding fight against match fixing. A representative of football insisted on the need to develop report procedures for the players (an online platform already exists in Estonia, but only a very few players reported approaches or match fixing rumours).
- In Estonia, there is a general criminal legislation including corruption but nothing is specifically dedicated to sports fraud at the moment. The crime of fraud (article 209 of the Criminal Code) is drafted in much more general terms: It applies to a person who receives material benefits by knowingly misrepresenting existing facts and is punished with imprisonment of up to 3 years (5 in cases of aggravating circumstances, such as large-scale activities or those involving a group or criminal organization).
- According to the Police, the judgment of the first match fixing court case will be very important to be sure that the current Estonian legislation is adapted.

<table>
<thead>
<tr>
<th>Measures</th>
<th>Existing (Yes / No)</th>
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<tbody>
<tr>
<td>Betting: Fight against illegal betting</td>
<td>YES (black list, IP blocking, advertising ban)</td>
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<tr>
<td>Betting: Authorised list of bets</td>
<td>NO</td>
</tr>
<tr>
<td>Betting: Other restrictions (pay out)</td>
<td>NO</td>
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<tr>
<td>Sport: Education programs</td>
<td>YES for football. Other federations (basketball, tennis) intend to do so in a short future</td>
</tr>
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<td>Betting prohibition for sport actors</td>
<td>YES (at least for football, basketball and tennis through ITF rules – International Tennis Federation)</td>
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<tr>
<td>Conflicts of interest: Disclosure of inside information</td>
<td>NO (only football through UEFA rules)</td>
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<td>Integrity officer</td>
<td>NO (except for football due to UEFA requirements)</td>
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<tr>
<td>Sport: Prohibition to control betting operators</td>
<td>NO</td>
</tr>
<tr>
<td>Criminal offence &amp; Sanctions</td>
<td>NO specific offence for sports fraud (Criminal Code at this time)</td>
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<tr>
<td>Betting: Prohibition to control</td>
<td>NO</td>
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<tr>
<td>Sports when bets are offered</td>
<td>NO</td>
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<td>----------------------------</td>
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<td>Contract between sport and betting</td>
<td>NO</td>
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<tr>
<td>Intelligence and monitoring</td>
<td>YES in football (agreement between the football association and SportRadar)</td>
</tr>
</tbody>
</table>

**Next steps and recommendations:**

Estonia may possibly look into the 5 following priority items:

- Implementation of cooperation at a national level, for example through a specific working group (proposal: representatives of the Ministries of Finance, Interior, Justice and Sport, of the National Olympic Committee, of the main sports federations and of the legal betting industry). The aim of this group could be to think jointly about model rules, conflicts of interests procedures and measures to fight against match fixing.
- Appointment of an “integrity officer” in each “big” sport Federation.
- Implementation of education programmes focusing on face-to-face (players, referees) and “train the trainers” in the main federations (what means not only in football).
- Limit the betting-related risks (including possible restrictions on risky types of bets, high pay out rates and stakes limits). On that issue, it seems important that sports organizations’ expertise is used to estimate which bets could be easy to influence.
- Transfer-exchange of information and expertise between betting operators, public authorities and sports organisations.
APPENDIX

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