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## A strategic approach to gambling regulation

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### ABSTRACT

Gambling regulation can be informed by various conceptual models, such as the public health model which views it as being intrinsically harmful like tobacco, and which therefore implies the use of population-based harm prevention measures. The children's game of whack-a-mole has also been used to describe the challenges of online gambling regulation, where new regulatory issues continue to emerge. Here I explore the implications of seeing gambling regulation like the strategic gambling game of poker – a metaphor that is close to home, and which directs attention on the gambling industry's ability to constantly innovate its products and practices. I argue that gambling policy should not just act on current products and practices, but also strategically consider potential harmful innovation. Using international examples, I show how gambling regulations have failed by stating key terms vaguely, by containing exploitable loopholes, and by giving gambling operators strategic flexibility in regulatory compliance more broadly. A more strategic regulatory approach is therefore recommended, which follows an expert poker player's mindset by anticipating and countering potential gambling operator responses. This means defining key terms concretely, implementing broadly applicable policies, and restricting gambling operators to evidence-informed actions. Other implications of the model include minimizing operators' informational advantages over regulators. Reductions in population harms can only be achieved by recognizing the inherent mutability of gambling products and the industry's utilization of technology. While the whack-a-mole metaphor sees these challenges as being insurmountable, I argue that better outcomes could be obtained by taking a strategic approach to gambling regulation.

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Legalized gambling has spread across the world in recent decades. Some jurisdictions are introducing new regulated markets, such as in North America; and some jurisdictions with more established markets are now introducing harm-prevention policies, such as in Great Britain (Wardle et al. 2024). The “public health model” is a popular conceptual model for harm-prevention initiatives, which argues that gambling is intrinsically harmful, like tobacco, and that tobacco's population-based harm prevention measures, such as advertising restrictions, should be followed (Volberg 1994; Wardle et al. 2019, 2024; Abbott 2020; Livingstone and Rintoul 2020; Regan et al. 2022). While the public health model has succeeded in putting gambling harms on the international policy agenda (Ukhova et al. 2024), here I argue that harm-prevention measures that exclusively follow the tobacco control playbook may miss fundamental

differences between tobacco and gambling. While combustible tobacco has hardly changed as a product, gambling has continually transformed itself *via* technological innovation (Volberg 2001; Walters 2003; Schüll 2012; Orford 2019; Cassidy 2020). “The swiftly changing tactics of the commercial exploiters” that a British policymaker observed a century ago might be the only aspect of gambling that they would recognize today (Miers 2003, p. 135). In this think piece I argue that the public health model's long-term aims can only be achieved by recognizing this uniquely dynamic aspect of gambling harm prevention. I liken this to seeing gambling regulation as a poker game.

The children's game of leapfrog has been used to describe how gambling machines can be altered to evade legal restrictions (Rychlak 1989), a topic which has been widely written about (King 1964; Holmes 1985; Rychlak 1989; Eisenrauch 1997; Miers 2003,

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2013; Rose 2004; Prum and McCrory 2014; Henderson 2025). As early as 1913 it was noticed that new machines would be designed to, “comply with the letter, but to do violence to the spirit and thwart the beneficent objects and purposes, of the laws designed to suppress the vice of gambling” (King 1964, p. 207). These issues only compound in online gambling today, where the regulatory problem has been likened to the children’s game of whack-a-mole (Alexander 2008; Schneider 2012; Holden and Edelman 2025; Newall 2025) – a game where no matter how hard the player tries, more moles always appear that need whacking. British harm prevention policies, such as stake limits on online slots or partial reductions of gambling advertising in professional sports, both took years to be implemented (Department for Culture and Media and Sport 2024; Torrance, Heath, Andrade et al. 2023). In the meantime, whole new ecosystems have developed, such as cryptocurrency-based online gambling platforms (Andrade et al. 2023), and new marketing practices such as gambling livestreaming (Wu et al. 2024) and social media advertising (Rossi and Nairn 2022). While in these instances a game has been used to describe regulatory challenges, I believe that a more optimistic perspective on regulatory solutions can be obtained *via* the strategic gambling game of poker.

Poker is like most other gambling formats in that the majority of poker players lose (Leonard and Williams 2015). And yet some skilled poker players win long-term (Levitt and Miles 2014; Potter van Loon et al. 2015; Palomäki et al. 2020; Newall and Talberg 2023). Depictions of poker skill in films like *Casino Royale* or *Molly’s Game* might showcase extravagant bluffs where a hero guesses an opponent’s exact hand from their mannerisms, a skill which professionals argue is secondary at best (Caro 1984; Elwood 2012). Contrastingly, poker authors have for decades emphasized a mathematical approach based on game theory (Zadeh 1974; Ankeny 1982; Sklansky 1999; Chen and Ankenman 2006; Ferguson and Ferguson 2007), which nowadays harnesses super-human AIs (Newall 2013; Moravčík et al. 2017; Brown and Sandholm 2018, 2019; Acevedo 2019; Brokos 2019), as in chess or go. Whether implemented by a skilled human or AI, the game theoretic approach to poker asks a simple question in all strategic dilemmas: how badly could things go, if a skilled opponent knew my strategy, and subsequently played their most profitable counterstrategy?

Poker can be seen as relevant to gambling regulation for the following reasons. The gambling industry

has in recent years coalesced into a small number of multinational multi-brand conglomerates, with access to the best data, and who can constantly innovate their marketing strategies and product offerings. In other words, each gambling operator can be seen as one of the best poker players around. As I will illustrate with examples of international policy failure, gambling policy should not just act on current products and practices, but also strategically consider future harmful innovation. This makes the strategic game of poker the perfect metaphor for this problem. An excellent poker player needs to think about not just what their opponents are doing now, but also consider how their opponents will react to any new strategy (Chen and Ankenman 2006). This is in my view an appropriate outlook for gambling policy-makers to take.

In the remainder of this article, I will argue that three core strategic mis-steps underly a range of international gambling policy failures: vaguely-defined terms, regulatory loopholes, and strategic flexibility more broadly. In each instance, a policy goal was undermined, either rapidly, or over time with new technology, *via* a skillful strategic response from gambling industry actors. Policy failures occurred from a failure to deny these responses. I then highlight some other implications of the poker metaphor, before concluding with some potential strategic solutions to these issues.

## Vagueness

A vague policy is one which leaves certain key terms without a precise definition, which therefore provides exploitable ambiguity for the gambling industry. The 2005 Gambling Act in Great Britain aims to protect “children and other vulnerable persons from being harmed or exploited by gambling” (Welsh et al. 2014). While children is a clearly-defined term, referring in Great Britain to people under the age of 18, “vulnerability” is never defined in the Act (Welsh et al. 2014). This vagueness creates an exploitable ambiguity, whereby it becomes difficult to prove instances where an operator has failed to protect a vulnerable person. In line with this concern, one study using operator account data found that only 3.9% of account-holders were contacted about potential harmful patterns of use (Forrest et al. 2022). However, contemporaneous prevalence data suggested that 10% of online gamblers were at moderate-risk or higher on the Problem Gambling Severity Index (PGSI), which the authors of that study saw as being one valid

benchmark for the proportion of potentially vulnerable customers (Forrest et al. 2022). Since people with higher PGSI scores tend to have higher gambling losses (Zendle and Newall 2024), this vagueness can be exploited by operators to not intervene on vulnerable yet profitable customers.

The Great British gambling regulator the Gambling Commission requires gambling to be provided in a “fair and open” way (BIT 2024), which often means things like checking the random number generators on gaming products. This also means providing “easily available” information about a person’s chances of winning, although availability is again never defined (Newall et al. 2022). A study of how this information was implemented across over 300 online roulette games found that the required statistical information was placed randomly in dense help screens, containing an average of 2,000 words each, and shown in small and unclear text (Newall et al. 2022). This is very different to researchers’ suggestions to give statistical information clearly (Newall et al. 2023), perhaps using graphical aides akin to a food nutrition label (Walker et al. 2019). The gambling industry has a self-serving incentive to not provide clear statistical information, since this could dissuade people from using their most profitable products. The vagueness of “easily available” therefore also appears to have been exploited in a self-serving way. The examples over this and the previous paragraph will be returned to in the strategic flexibility section.

Vague terms have been used by other gambling policymakers internationally. Gambling advertising often features in regulated gambling markets (Torrance et al. 2021), and policymakers are often interested in restricting its content or frequency. German policy states that “advertising must not be excessive” (Singer et al. 2024, p. 437), while Swedish policy states that advertising must be in “moderation” (González Díaz et al. 2024), with neither vague term being subject to further elaboration. The vague Swedish policy has been said to have contributed to noticeable increases in gambling advertising frequency since the market’s liberalization in 2019, when privately-owned operators were allowed to enter the market (González Díaz et al. 2024). The 2019 regulations have been observed to include even more critical vagueness, such as the statement that “gambling in Sweden should be kept at a reasonable level” (Goedecke et al. 2024, p. 26). I would argue that the vagueness of these key terms means that their spirit is unlikely to be upheld.

## Loopholes

Gambling policies might be clearly-defined, but contain “loophole” exemptions. While a loophole might appear insignificant when a policy is written, it can be creatively unpicked over time. Loopholes will be illustrated across gambling advertising, an issue of key policy attention since it is visible even to people who do not gamble (Wilson et al. 2024); and gambling machines, which in their modern electronic form have a strong association with gambling harm (Allami et al. 2021).

Italy is one jurisdiction that has had a far-reaching gambling advertising ban since 2019 across sports sponsorship, TV advertising, and social media (Wilson et al. 2024). However, the ban includes an exemption regarding news provision (Wilson et al. 2024), which has led to gambling operators building and advertising across Italian soccer news websites such as “bet365scores.it,” “bwin.tv,” and “leovegas.news” (Torrance, Heath, & Newall, 2023; Heath et al. 2025). The logos for these websites look almost identical to those of the original brands, thereby inundating Italian soccer with gambling-like attentional cues (Farr et al. 2024), which is in effect very similar to the situation motivating the 2019 ban.

Belgium is another jurisdiction with a far-reaching advertising ban since 2023 (Wilson et al. 2024). Although the gambling industry has at the time of writing had less time to react to the Belgian than the Italian ban, it may well contain a greater number of loopholes that can be unpicked (De Jans et al. 2024). Gambling operators are allowed to still advertise on search engines in response to gambling-related search-terms, a practice that has descriptively appeared to increase (De Jans et al. 2024). Sponsorship of amateur sports clubs is still allowed (Wilson et al. 2024), and gambling operators can still associate themselves with charitable causes, produce content on their social media pages, and produce branded content such as podcasts – practices that local researchers believe may be all be increasing (De Jans et al. 2024). These loopholes may lead to gambling advertising still being a significant part of life for many people in Belgium (Boone et al. 2025).

One loophole in gambling machines involves the degree of skill involved. Under American law, a machine is classified as gambling if chance is the dominant factor over skill, while under English law, any degree of skill at all will evade the machine’s classification as gambling (Eisenrauch 1997). Reports of this loophole’s use have therefore often appeared from Great Britain (Griffiths 1993; Miers 2003, 2013; TVC

Leisure 2016), although instances have occurred in the US as well (Holmes 1985; Blatt 2025). In all instances, the “skills” involved were not sufficient to enable people to become long-term winners (Turner and Horbay 2004), as skill is usually defined in poker (Levitt and Miles 2014; Potter van Loon et al. 2015; Palomäki et al. 2020; Newall and Talberg 2023).

The next gambling machine loophole involves changing the nature of the random number generator underlying a gambling machine, in order to classify it as another type of gambling. In Great Britain, community-based betting shops are only allowed to offer slower-paced off-premises *betting* (e.g. horse racing, sports events), rather than faster-paced *gaming* (e.g. roulette, blackjack). The gambling machines eventually introduced to these shops are therefore called fixed-odds betting terminals, as the random number generators are placed off-premises to satisfy the letter of the law (Miers 2013; Orford 2019; Cassidy 2020). For tribal casinos in the US, bingo is subject to fewer restrictions than other gambling formats, so the resulting gambling machines are often technically terminals connecting users to remote bingo games (Rose 2004; Prum and McCrory 2014; Henderson 2025). These machines often have spinning reels to imitate a conventional slot machine, alongside a disclaimer that the graphics “are for entertainment purposes only” (Henderson 2025, p. 290). In some instances the machines known as “video lottery terminals” are based on the results from off-site electronic lottery tickets, provided by operators that can only legally sell lottery tickets (Rose 2004; Turner and Horbay 2004; McGowan 2024). In other instances, racecourses have introduced machines by randomly selecting outcomes from their historical database of past racing outcomes when this is the only type of gambling that they can legally provide (Rose 2004; McGowan 2024). In all these instances, the motivation for alteration is to offer highly-profitable electronic gambling machines by reclassifying them as a legally permitted gambling format.

## Flexibility

Regulations will also sometimes provide explicit flexibility. Returning to the study using operator data on the contacting of potentially vulnerable gamblers from the “vagueness” section (Forrest et al. 2022), the regulations provide flexibility by stating that this contact can be made *via* email or telephone. A randomized controlled trial from Norway suggests that telephone contact leads to a higher subsequent reduction in

gambling activity than written contact *via* letter (Jonsson et al. 2020). The British study corroborated this, finding that “substantial moderation of gambling activity” also tended to follow from telephone contact (Forrest et al. 2022, p. 21). However, the study also found that only 0.13% of the sample received telephone contact, compared to the 3.9% who were emailed. Not only did operators contact fewer people than they should have (as shown in the previous section), but they overwhelmingly favored their least effective intervention method. Strategic flexibility appears to have been used to maintain company profit over consumer protection.

Returning to the study on “easily available” information about the chances of winning from the same section (Newall et al. 2022), this information can be given in different ways (Gambling Commission 2025). One way is called the “return to player” format, which highlights the average amount of winnings returned by the game, e.g. “this game has an average percentage payout of 90%” (Newall et al. 2022). However, this information can also be provided in terms of the average amount lost by the gambler, which is known as the “house edge” format, e.g. “this game keeps 10% of all money bet”. Experiments comparing these formats have shown that the house edge results in lower chances of winning and is interpreted correctly by significantly more gamblers than the return to player (Newall et al. 2020a, 2020b). From a risk communication perspective, the house edge is superior (Newall et al. 2023). However, none of the audited games used the house edge instead of the return to player (Newall et al. 2022). This suggests another way in which a self-serving incentive is followed to not educate people about the most profitable gambling products.

“Losses-disguised-as-wins” (LDWs) are a frequently-studied deceptive gambling product feature, where modern slot products on machines or online respond to a \$1 “win” from a \$2 bet (aka, a \$1 loss), with the same sound and visual celebratory effects as an actual win (Dixon et al. 2010; Myles et al. 2023). Banning LDWs is an intuitive policy therefore, which the Australian states of Queensland and Tasmania have done (Livingstone et al. 2019), and which the Great British regulator announced for online gambling in 2021 (Gambling Commission 2021). However, this last “ban” only prevented using the *same* audiovisual effects for wins as for LDWs, thereby providing the flexibility to use other celebratory effects. A subsequent audit found that 69% of 26 popular games LDW sounds used sounds that were deemed by a sample of local slots gamblers as being celebratory,

which in several instances involved only small modifications from the win-related celebratory sound (Myles et al. 2026). The LDW sounds generally met the letter of the regulation, but without following its spirit which intended to remove LDWs. The authors of that study concluded that policies should provide less strategic flexibility to the industry, such as requiring LDW sounds to be selected from a sound bank of independently-assessed non-celebratory sounds (Myles et al. 2026).

### Other implications of the poker game metaphor

The poker game metaphor for gambling regulation has other implications. Gambling products and ecosystems are complex, and yet gambling regulators possess far less relevant knowledge and expertise than the gambling industry does. In poker it is relative and not absolute skill which determines player outcomes (Potter van Loon et al. 2015), meaning that without upskilling that policymakers may continue to be strategically outplayed by industry. Regulators with industry knowledge cannot just be hired to solve this problem, as the corresponding conflicts-of-interest would overwhelm any advantages from their knowledge (Orford 2019). However, other ways of upskilling regulators exist. For example, training programs or consultation with academic experts could reduce these knowledge gaps. At present, these knowledge gaps may in fact be further widening, with former British policymakers often developing subsequent careers as gambling industry lobbyists (Davies 2020; Webb 2025; Khan 2026). Key gambling policy roles may therefore need to include restrictions on subsequent employment or consultancy with gambling industry stakeholders. Multiple actions may well therefore be necessary to address these knowledge gaps between industry and regulators.

These points also highlight the need for more regulatory skepticism regarding industry lobbying. As a game, poker is determined by the cards that are held and actions that are taken, whereas players may also attempt to persuade or misdirect their opponents by talking. In game theory it is known that in games like poker that “talk is cheap” (Farrell 1995): as the players’ interests are opposed, there is no incentive to convey useful information. Gambling industry lobbying efforts seek to enhance industry profits, which since industry profits equate to gamblers’ losses, must serve to ultimately increase harm (Zendle and Newall 2024; Rossow et al. 2025). Regulators should therefore

not be misled by industry lobbying, as gambling is no ordinary commodity (Sulkunen et al. 2018). At present, international industry lobbying efforts to regulators often mention the threat of illegal gambling (Newall and Jonsson 2026). This threat is then interpreted as recommending different policy responses, such as the removal of state monopolies in Canada, the weakening of existing consumer protections in Sweden, or the weakening of incoming consumer protections in Great Britain (Newall and Jonsson 2026). In none of these jurisdictions, however, has the industry backed up these recommendations with the high standards of evidence that they ask for in other policy debates, such as debates on gambling advertising restrictions (Newall et al. 2024). Industry lobbying efforts should therefore be considered with much greater skepticism, and equal levels of evidence required across different gambling policy debates.

The metaphor of poker for gambling regulation has another implication. It is against the rules of poker for two players to “collude” together, for example by sharing details of their private cards, as this creates an unfair advantage. The global gambling industry has in recent years coalesced into a small number of multinational multi-brand conglomerates (Orford 2019). And each online operator largely offers the same broad range of gambling products, no matter which product they initially focused on (Newall and Allami 2023). Furthermore, British operators largely speak with one voice in political lobbying *via* the Betting and Gaming Council. By comparison, in the run-up to the £2 limit on British electronic gambling machines, the one operator which publicly supported this limit was the one without a significant British land-based presence (Ahmed 2017). This convergence and similarity robs consumers of meaningful choice, and aligns operators’ incentives to resist harm-prevention reforms. For example, if one operator invents a new exploitative sports betting feature, such as the ability to “cash-out” unsettled bets (Bennett et al. 2024), then diffusion of this feature across operators provides them with the incentive to collectively resist any potential regulation (Heidhues et al. 2016). Collusion is explicitly disallowed in poker because it creates an uneven playing field, and gambling stakeholders should consider whether the industry’s modern domination by a few multinational conglomerates poses similar issues.

Combating the gambling industry’s strategic power may require the building of a diverse coalition of stakeholders. Legislation can rarely be all-encompassing, and needs to be interpreted by for example the

court system in common law jurisdictions such as the US and UK (Holden and Edelman 2020). The courts can therefore act with a speed and flexibility that is closer to that of the gambling industry than that of legislative drafters. For example, the US is currently seeing a wave of online casinos attempting to exploit a loophole by calling their gambling products a “sweepstakes” offer which comes free with the purchase of a virtual currency (Holden and Edelman 2025). Sweepstakes promotions have a long history, with for example the fast-food retailer McDonald’s often offering prize-draws of either food or money along with purchases of its products (Holden and Edelman 2025). However, with sweepstakes casinos the virtual currency sold is arguably a decoy product, as the “promotional” prize-draw being the real thing sold, such as access to a fully-functioning sportsbook (Holden and Edelman 2025). This again shows how in gambling, that new technologies can be used to take advantage of vague definitions and loophole exemptions, revealing the need to assemble a diverge and vigilant coalition against evolving gambling industry tactics.

### Conclusion: Strategic recommendations

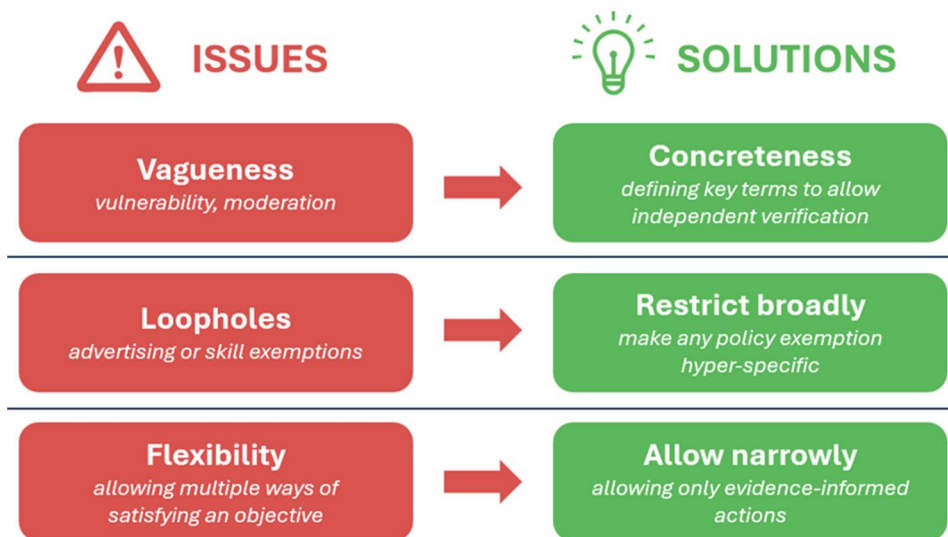
Many gambling researchers have enthusiastically adopted tobacco as a model for gambling regulation (Volberg 1994; Wardle et al. 2019; Regan et al. 2022). Yet gambling products are more varied and changeable than combustible tobacco, meaning that the exclusive use of harm-prevention strategies from tobacco may not address gambling’s unique issues. The children’s games of leap frog (Rychlak 1989) and whack-a-mole (Alexander 2008; Schneider 2012; Holden and Edelman 2025; Newall 2025) have also been used to frame the struggle of regulating the dynamic gambling industry. The strategic game of poker is used here as a more positive framing of this inherent regulatory challenge, with Figure 1 illustrating potential strategic solutions to the three classes of policy failure discussed here.

Policy vagueness can be replaced by policy concreteness (Figure 1), where key terms are defined clearly enough that they can be independently verified. For example, vulnerability can be defined in terms of validated screeners such as the Problem Gambling Severity Index (Ferris and Wynne 2001) and/or in terms of established risk factors for harm (Allami et al. 2021). Advertising moderation can be defined in terms of frequency and/or content, which can be verified for example *via* audit studies of TV

advertising (Sharman et al. 2024) or through the use of digital avatars online (Advertising Standards Authority & Committee of Advertising Practice, 2019). Recent British rule changes, stating that gambling adverts cannot be of “strong” appeal to under-18s, do not appear to me to be substantially more concrete than the previous rule based on “particular” appeal (Committee of Advertising Practice 2022). Policy terms need to be defined concretely to avoid exploitable vagueness.

Policy loopholes can be eliminated by broad restrictions which make any exemptions hyper-specific (Figure 1). For example, British community-based gambling machines evade a regulation meant to prevent fast-paced gaming products from these venues, by placing their random number generators off-premises, therefore becoming in scope of allowable “betting” products (Miers 2013; Orford 2019; Cassidy 2020). A hyper-specific exemption which was more aligned with the intended allowable activity, requiring allowable bets to be determined off-premises *and* to require a degree of human or animal participation, would have made this loophole harder to exploit.

Interestingly, the firms that came to dominate the US sports betting market after its 2018 legalization originated from a loophole in a 2006 piece of legislation (Holden et al. 2020; Holden and Edelman 2020). The 2006 legislation aimed to restrict online poker and sports betting, but had an exemption regarding “fantasy sports”. This is where athletes from multiple sports teams are combined into a fantasy team, with the fantasy team scored by the real-world athletes’ performance. Small prizes are then typically given to the owner of the best fantasy teams at the season’s conclusion. However, this exemption led to the creation of new gambling websites with higher prizes based on large potential wagers, and prizes based on *daily* sports outcomes: “daily fantasy sports” (Holden et al. 2020). These websites satisfied the letter of the 2006 exemption, but looked very different to the previous activity. The two biggest daily fantasy sports websites came to then dominate conventional sports betting once it was legalized in 2018 (Holden et al. 2020; Holden and Edelman 2020). A hyper-specific exemption could have prevented these firms from coming to such early prominence, by exempting only fantasy sports as it was then conducted – as a low-stakes and season-long game. Policy loopholes are therefore a broader issue than the domains of advertising and gambling machines that I drew from to illustrate this recurring policy failure.



**Figure 1.** The three classes of gambling policy failures, and their potential strategic solutions.

Gambling operators' broader strategic flexibility can be countered by policies that allow a narrow range of evidence-informed actions (Figure 1). The British policy requiring interventions on vulnerable customers could have required a minimum degree of customer interaction across the customer base, instead of providing two options which varied greatly on this dimension (Forrest et al. 2022). And the Great British ban on celebratory sounds on losing outcomes could have worked better if only a number of independently-tested negative sounds were allowed to be used (Myles et al. 2026). These examples show how strategic flexibility is broader issue in gambling policy than the previous categories of policy vagueness and loopholes.

This think piece therefore focuses on potential change mechanisms that could underly recent calls for broad systemic change to longstanding challenges in gambling and elsewhere (Chater and Loewenstein 2022; Ukhova et al. 2024; Heirene 2026). Building support for widespread and likely difficult changes to the status quo is its own challenge, given industry narrative influence (Livingstone 2024) and an increasing lack of patience among the electorate. Complex solutions do not translate easily into three-word political slogans. While this might make substantive change feel hopeless, people with reforming instincts should not give up hope. Research on social tipping points shows how minority opinions can quickly accelerate to become group consensus once they reach a certain threshold (Centola et al. 2018). Advocates for transformative change in gambling policy should therefore continue to explore novel framings or media to express their views in.

This perspective is subject to limitations, which should be subject to open peer debate. Any issue as complex as the global gambling industry is beyond the scope of any one conceptual model or perspective piece to fully summarize. This perspective does not cover regulatory issues posed by illegal gambling or gambling-like products such as video game loot boxes which are not regulated as gambling. These are important issues that require their own in-depth consideration (Wardle et al. 2021; Newall and Weiss-Cohen 2022; Xiao et al. 2022; Macey and Hamari 2024). Any metaphor is imperfect and should not be taken too literally, and multiple metaphors can still be useful for the same issue. It could further be argued that many of the strategies outlined here, such as the exploitation of loopholes, also have precedence in the public health fight against tobacco (Freeman et al. 2022; Gannon et al. 2023). Therefore, gambling's increased technological complexity may be its main difference to tobacco, instead of there being an intrinsic difference between the regulatory challenges.

In conclusion, gambling regulation can be informed by various conceptual models, such as seeing it as being intrinsically harmful like tobacco, or seeing it like a game. This think piece argues that successfully implementing a public health approach to gambling harms requires strategic thinking, as demonstrated by the skilled game of poker.

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## Author contributions

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