MGA Thematic Review Local Football Betting Landscape

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Definitions

Authority or Malta Gaming Authority

The Malta Gaming Authority as established by the Gaming Act (Chapter 583 of the Laws of Malta).

Type 2 Gaming Services

Games of chance played against the house, the outcome of which is not generated randomly, but is determined by the result of an event or competition extraneous to a game of chance, and whereby the operator manages his or her own risk by managing the odds offered to the player.

Non-Maltese Account Holders

Shall refer to players who are established, have their permanent address, and or usually reside in a foreign country who hold a player's account with a licensee.

Sports Governing Body

An organisation that prescribes final rules and enforces codes of conduct with respect to a sporting event, member clubs, and participants therein.

Football Competitions involving Maltese registered Teams

Shall refer to any football competition, tournament or event which takes place in Malta, or abroad, and involves a football club registered in Malta.

Stakes

Money or money's worth that is or must be committed in order for a player to participate in a game, whether or not it is risked directly on a result of the game.

Active Player or Player

Shall refer to Maltese Account Holders who placed wagers on sports betting after registration.

Region

Shall refer to the area where the locality is located, depending on the registered address of the player.

Winnings

Shall refer to the monetary or non-monetary prizes that a player receives as a result of the successful placing of a wager.

Context

Scope of the Document

In line with the Malta Gaming Authority's (MGA) ongoing commitment to evidence-based supervision and risk-focused regulatory engagement, this Thematic Review explores betting activity related to local football competitions. This initiative, first announced in the Authority's **Regulatory Oversight Supervisory Engagement Efforts for 2025** publication, aims to enhance our understanding of market dynamics, licensee monitoring practices, and potential integrity risks within this segment.

Local football continues to represent a distinct area of regulatory interest due to its local significance, the accessibility of matches, and the elevated risk profile associated with potential insider influence and suspicious betting activity. This review therefore seeks not only to identify patterns in local football betting behaviour, but also to assess the extent to which licensees are proactively monitoring and responding to unusual or high-risk activity. The findings outlined in this report draw on data submitted by licensees offering markets on Maltese football events, including wagering volumes, demographic characteristics of players, and internal controls used to detect and report suspicious betting.

This publication forms part of the MGA's broader regulatory objective of ensuring the integrity of sports betting markets, improving industry standards, and safeguarding the reputation of Maltese sport and gaming.

Structure of the Document

Following this introduction, Section 2 of this document provides an overview of the methodology adopted for this Thematic Review. Section 3 details the key findings emanating from this review. Section 4 outlines the general outcome from the exercise, followed by a concluding section.

Methodology

This Thematic Review forms part of the MGA's broader risk-based supervisory framework, which prioritises data-driven assessments of market segments with elevated risk exposure.

To conduct this Thematic Review, a dedicated questionnaire was distributed to all B2C Type 2 licensees in February 2025. The data collection exercise covered betting activity for the period from 1 September 2023 to 31 August 2024, ensuring a full seasonal cycle of Maltese football competitions.

Both qualitative and quantitative methodologies were used, allowing the Authority to gather detailed insights on financial performance, account demographics, cross-border activity, and integrity measures.

Mandatory fields within the questionnaire were supported by validation logic to ensure consistency and accuracy of responses.

Where clarification was required, targeted follow-ups were conducted with licensees to verify information and ensure that the dataset reflected an accurate and reliable picture of the market. This approach supports the Authority's commitment to transparency, accuracy, and robust evidence-based monitoring of the Maltese football betting landscape.



Sent to 60 Licensees.



70% offer betting markets on Local Football



37% indicate having Maltese Accounts, placing bets on Local Football

Key Findings

Financial Landscape of Maltese Football Betting

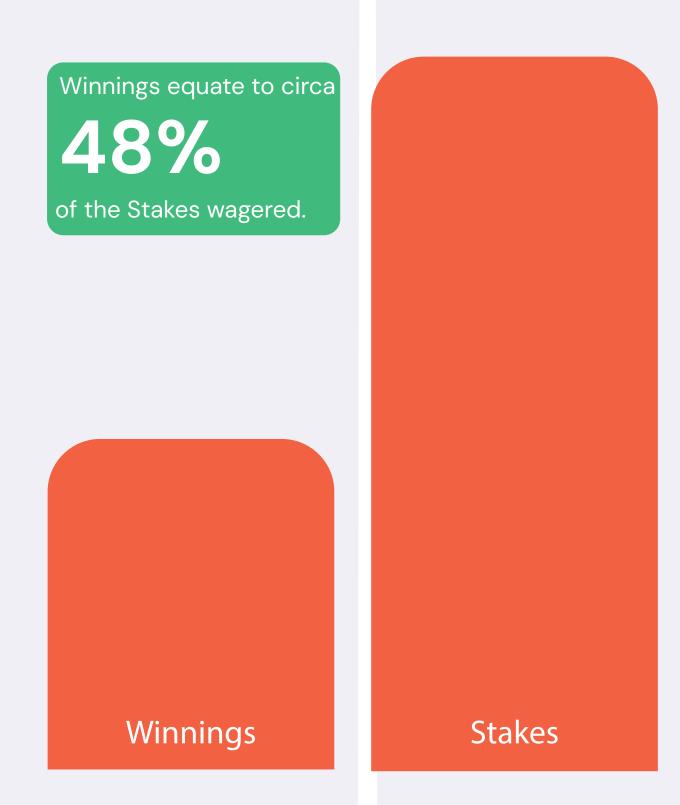
An analysis of the submitted financial data for this period highlights several notable points regarding betting activity related to Maltese football competitions. Total stakes reported vary significantly across the market, ranging from under €50 for the smallest declared volumes to amounts exceeding €800,000 for the highest reported levels. Such contrasting figures reflect the wide differences in the reach of each licensee's customer base and the level of player activity targeting these competitions.

No submissions were found where zero stakes were reported alongside positive gaming revenue, suggesting that, at a broad level, the data aligns with the expected flow of funds. However, there were several cases where total winnings paid out exceeded the total stakes placed, resulting in payout ratios greater than

100% of the stakes placed. In one instance, a licensee reported stakes of less than €50 and declared total payouts close to €900, implying a payout ratio above 450 per cent. Such unusually high payout ratios may arise in isolated cases where payouts are significantly larger than the stakes placed.

In addition, some licensees reported negative gaming revenue figures, implying they operated at a loss within the Maltese football betting segment during the period under review. While occasional negative returns can occur, repeated patterns might possibly lead licensees to stop offering Maltese football competitions.

Overall, this financial snapshot illustrates both the moderate scale and the variable performance of Maltese football betting markets. Given the fluctuations observed in the market, the data highlights the importance of continued monitoring by licensees to support market transparency and uphold integrity standards.



A snapshot of the Financial Performance of Maltese Football Betting Markets.

Markets Offered

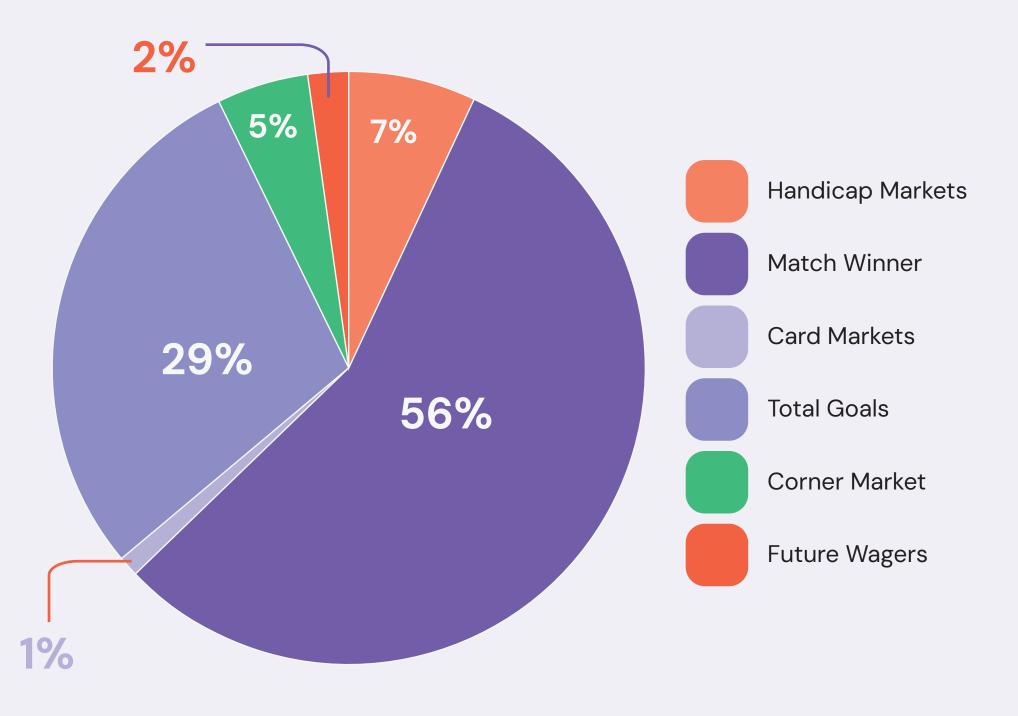
Priorto submission, participating licensees were provided with a predefined list of betting markets from which to indicate their offerings. This list included:

- Match Winner
- Total Goals
- Handicap Market Assigning an advantage to one team or a disadvantage to the
- other prior to the start of the match
- Yellow Card Market
- Red Card Market
- Corners Market
- Future Wagers Long-term bets on event outcomes
- Other

Questionnaire results show that licensees provide a broad but uneven range of betting markets on Maltese football competitions. The Match Winner and Total Goals markets are the most commonly offered, with nearly all licensees including them in their portfolios, reflecting the consistent popularity of outcome-based betting options.

Markets such as Handicap betting and Both Teams to Score (BTTS) are offered by fewer than half the licensees, indicating a more selective integration of these markets. Likewise, the availability of Corners, Red Card, and Yellow Card betting remains limited, suggesting that eventdriven wagering is less prominent within the Maltese football context.

A modest proportion of licensees also includes Future Wagers and Qualification markets, pointing to an interest in long-term engagement beyond individual matches. The "Other" category, though seldom used, demonstrates that some licensees continue to experiment with niche or customised betting propositions.



Average Distribution of Betting Markets across Licensees

Overall, the distribution of market offerings illustrates the differing strategies among licensees. Some focus on a core set of markets, while others maintain a broader portfolio to appeal to a wider range of bettor preferences. This disparity is primarily attributed to the size of each operator's customer base and the level of player activity, with larger licensees generally better equipped to support liquidity in less common markets.

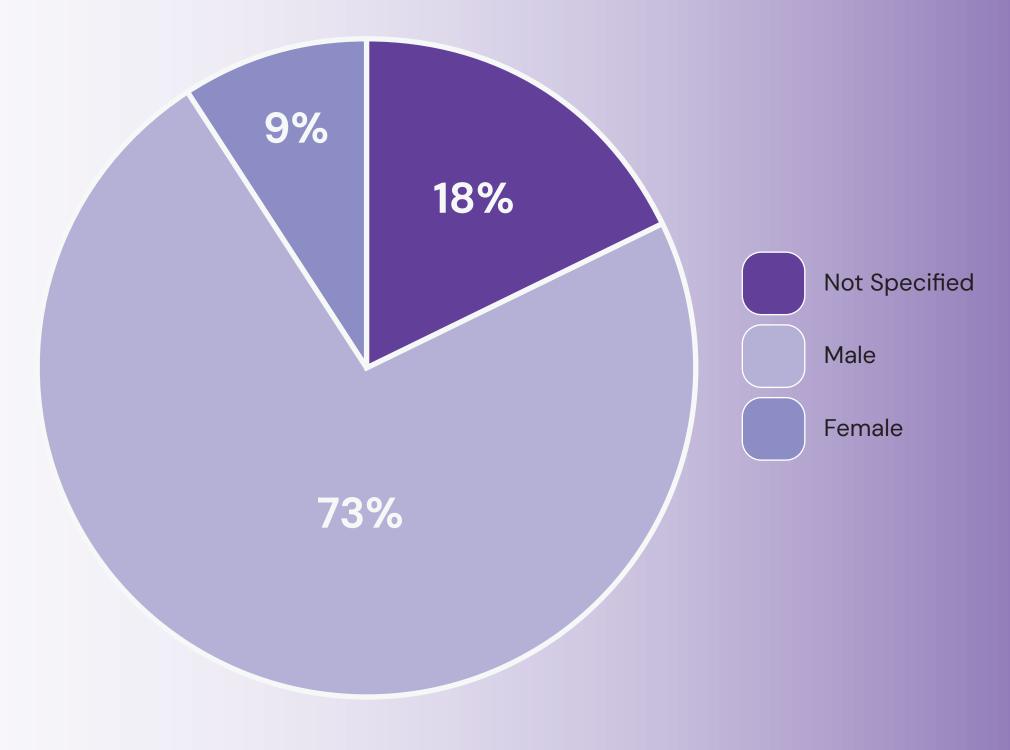
Participation of Maltese Bettors Activity

Data shows that the total number of active players varies widely between licensees, with some reporting only a few active local players while others manage several thousands.

Among these, the proportion of Maltese bettors who place bets on domestic football competitions remains low overall.

Reported figures show that, on average, only a small fraction of active players wager on local football, with percentages ranging from below 5 per cent for licensees with a broad international focus to just above 20 per cent for those with a more localised player base.

This pattern suggests that while players are active in sports betting in general, interest in local football competitions remains a niche segment within the wider betting market.



Gender Distribution of Bettors across Participating Licensees

Demographics

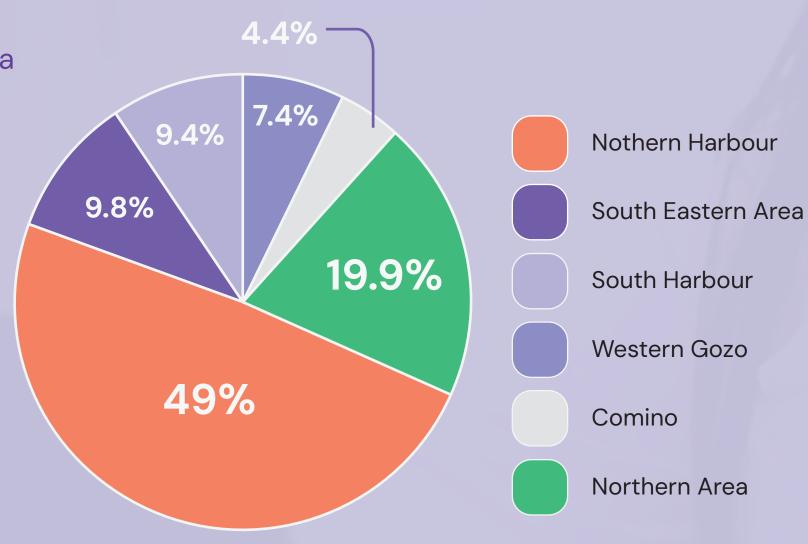
Demographic data highlights that this local football betting audience is predominantly male, with reported figures showing that the share of male account holders typically exceeds 85 per cent, and in some cases, approaches 90 per cent. Female participation is limited, with very few licensees indicating significant female engagement in betting on Maltese football.

an terms of age, most players betting on local football are concentrated in the younger adult segments. For many licensees, the majority fall within the 18–34 age bracket, which consistently accounts for over half of the active Maltese player base. The 35–54 age group follows, often representing around a third of account holders. Engagement drops significantly among those aged 55 and over, showing only minimal participation in bets on Maltese football.

Regional data shows a slight concentration of Maltese football bettors in the Northern Harbour area, followed by the Southern Harbour and Western regions, broadly mirroring Malta's population distribution and urban centres.

Demographic and regional data point show that the local football betting market relies on a small but clearly profiled segment of Maltese bettors – predominantly young men living in the island's more densely populated areas.

Together, these figures show that the local football betting market relies on a small but clearly profiled segment of Maltese bettors — predominantly young men living in the island's more densely populated areas. Monitoring this participation and its evolution remains essential in understanding market trends and mitigating any related risks.



Regional Distribution of Bettor Accounts across Malta



Cross-Border Betting on Maltese Football

Several licensees reported active participation by non-Maltese account holders placing wagers on Maltese football competitions. The number of foreign players varies considerably across licensees, with some reporting several hundred to a few thousand cross-border bettors engaging with these markets. This indicates that Maltese football attracts a modest but notable international interest alongside its local betting base.

Reported regions of origin for these non-Maltese accounts span across various parts of Europe, with additional engagement noted from accounts registered in other international regions. This demonstrates that online betting on Maltese football extends beyond national borders and can draw activity from a broad geographical reach.

This cross-border engagement shows that Maltese football betting is not exclusively a localised activity. However, the scale remains limited compared to the volume of bets on larger international competitions.

Several licensees reported participation by non-Maltese account holders, indicating that Maltese football attracts modest but notable international interest alongside

Continuous monitoring of cross-border betting remains important as patterns can present different integrity and compliance risks that must be addressed through robust oversight and cooperation with local and international partners.

Integrity Protocols Assessment

Licensees reported a range of measures to safeguard the integrity of betting markets related to Maltese football competitions. Most submissions confirm that licensees implement integrity protections directly into their platforms and trading systems.

A common approach involves continuous monitoring by internal risk teams, which are tasked with identifying suspicious betting patterns and possible irregularities. A number of licenses rely on dedicated trading teams or external risk management partners who provide 24/7 sportsbook monitoring services and real time alert systems.

Several licensees highlighted that they deploy automated tools and advanced fraud detection systems to track unusual activity. Some indicated that they maintain player-level controls designed to detect and prevent players, officials, or insiders from placing bets on their own competitions or events where they could have undue influnence.

Ongoing engagement with stakeholders and continuous strengthening of detection tools remain vital to ensure that betting markets related to Maltese football maintain high standards of fairness and transparency.

Additionally, licensees noted that they have escalation procedures in place to report suspicious activity to the relevant Sports Governing Bodies or the MGA, when required. Collaboration with integrity monitoring services, third-party trading partners, or specialist data providers is also commonly cited as part of the safeguards used to mitigate integrity risks.

Some licensees also have a policy in place that account holders cannot place single bets on Maltese football competitions. Instead, they must involve at least one other international event in the betting slip. This further minimises the risk on local football and also highlights the integrity with which our licensees operate.

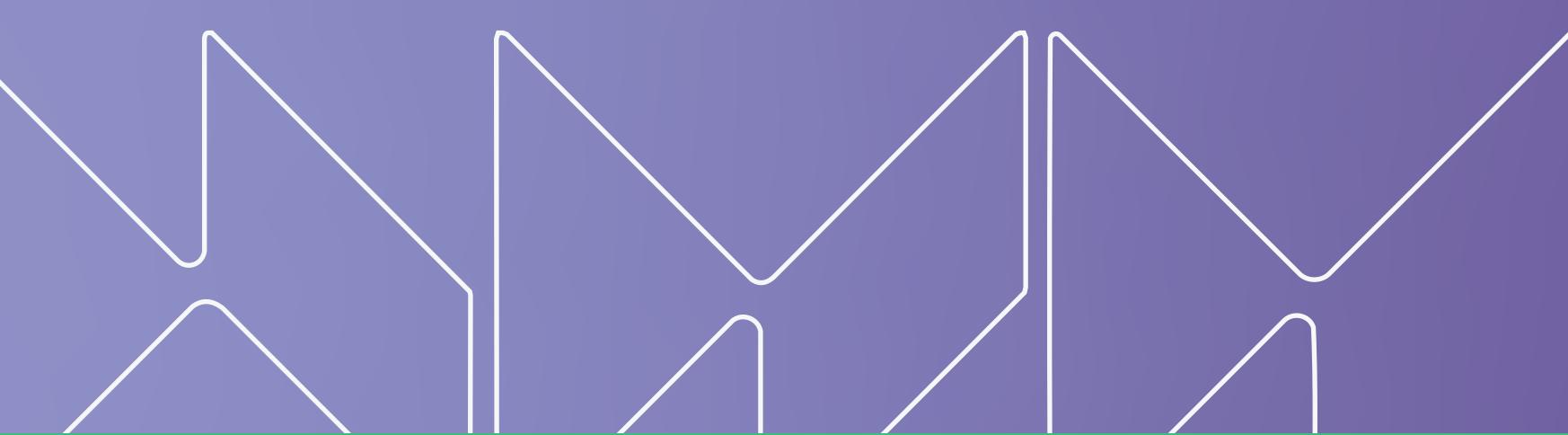
Overall, while the level of detail and sophistication varies between licensees, the responses show that most have at least basic integrity safeguards embedded in their operations. Ongoing engagement with stakeholders and continuous strengthening of detection tools remain vital to ensure that betting markets related to Maltese football maintain high standards of fairness and transparency.

General Outcome from the Thematic Review

This Thematic Review provides a clear snapshot oftheprevailing betting volume and demographic landscape of betting activity on Maltese football competitions. By gathering detailed data directly from B2C Type 2 licensees, the Authority has gained valuable insight into the scale of local and cross-border participation, the integrity safeguards in place, and areas where monitoring and reporting can be strengthened.

The findings confirm that while the Maltese football betting market remains moderate in size, its integrity depends heavily on the vigilance and collaboration of licensees. Continued cooperation, robust data-sharing, and proactive detection measures are essential to maintain trust and fairness in this sector.

The Authority remains committed to working closely with all stakeholders to ensure that betting on Maltese football, and sport in general, is conducted transparently and responsibly, safeguarding the interests of players, licensees, and the sporting community.



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Conclusion

The MGA recognises that robust collaboration between all stakeholders is essential to maintain fair and transparent betting markets. It is encouraging to note that several licensees have voluntarily introduced safeguards within their operations to detect unusual betting patterns, prevent conflicts of interest, and uphold integrity standards – reflecting a proactive commitment to supporting a fair betting environment.

Licensees play a critical frontline role in this framework. Their risk teams, trading partners, and monitoring tools provide the first layer of defence in identifying suspicious activity at the earliest stage. Effective cooperation between licensees, data providers, sports governing bodies, and the MGA enables the timely sharing of information and coordinated responses when integrity concerns arise.

It remains clear that protecting the integrity of Maltese football and other sporting competitions relies not only on regulatory oversight but on the commitment and vigilance of the licensees themselves.

The MGA remains committed to working closely with all licensees, strengthening detection mechanisms, and supporting proactive reporting and data-sharing practices that ensure Maltese sport remains clean and trusted.

Maintaining this collaborative approach is vital as the betting landscape evolves, ensuring that emerging risks are addressed promptly and that Malta continues to uphold its position as a trusted jurisdiction for responsible and transparent sports betting.

Looking ahead, the MGA will continue to refine its supervisory tools and deepen engagement with licensees to ensure that betting on Maltese football remains fair, transparent, and resilient to emerging risks. This review serves as a foundation for ongoing dialogue and targeted interventions where necessary.

This document serves not only as an update on the Authority's supervisory efforts but also as guidance for licensees. The Authority will continue to issue dedicated publications to provide additional clarity and support, ensuring that the best practices identified during such supervisory engagement methods are shared with the licensees accordingly.

Lastly, licensees are encouraged to approach the Authority with any questions they may have in this regard on info.mga@mga.org.mt.

