MYTH BUSTING IN LATAM

破除对拉美市场的迷思

iGAMINGCOLOMBIA COMBINES EUROPEAN EXPERIENCE WITH COLOMBIAN RESOURCES AND A COLOMBIAN PRESENCE. THEY STRIVE TO ASSIST MULTI-NATIONAL iGAMING OPERATORS LOOKING TO ENTER THIS NEW MARKET BY NAVIGATING THE REGULATORY LANDSCAPE AND ACTING AS THEIR PRIMARY POINT OF CONTACT FROM THE START UP STAGE THROUGHOUT THE ENTIRE BUSINESS LIFECYCLE.

iGAMINGCOLOMBIA将欧洲的经验与哥伦比亚的资源与实力相结合。他们透过引导该区监管环境的应对，以及在整个业务生命周期作为联络点，致力于协助跨国iGAMING运营商进入这个新市场。

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iGAMINGCOLUMBIA的合伙人MICHAEL MUSCAT博士（法学博士）和INGRID ALVARADO LOPEZ（法学硕士）的观点

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Over the past five years, the iGaming world has heard whispers and then shouts about Asia, Africa, and the Americas. The terms ‘Alternative Markets’ and ‘Emerging Markets’ were thrown around, with panel discussions and workshops catering for these being organised at major European iGaming events.

Over regulation, market saturation and generally increasing costs in Europe have naturally led providers and operators alike to search for new frontiers in the quest for innovation and new market-share. These, coupled with a sense of nostalgia for the way things (and revenues) were when it all began, have sparked global lobbies in what were once considered the most remote of places. Fast forward to 2016 and we witness the first European style regulatory regime in Latin America - remote gambling becomes legal in Colombia!

在过去的五年中，iGAMING世界开始默默讨论起亚洲、非洲及美洲市场，并在近年开始喧嚣。“另类市场”和“新兴市场”这样的术语随处都能听到，欧洲主要的iGAMING活动也组织了小组讨论和研讨会来满足这些需求。

在欧洲，由于监管过度，市场饱和而且成本普遍上涨促使供应商和运营商寻找新的领域，以寻求创新和新的市占率。这些因素以及对过往蓬勃的市场（及收入）的想念，让这曾经被视为世界最偏远之地的大门被敲开。时间快转到2016年，这一年我们见证了第一个欧式的监管制度在拉美诞生，线上博弈在哥伦比亚拥有合法性！

We are often facing numerous regulatory and operational questions when it comes to LatAm and iGaming. We also tend to come across the same myths and half-truths when dealing with European operators looking to enter these markets. Besides the obvious regulatory queries related to licensing costs, gambling and corporate taxation, the words 'grey markets' and 'payment processing' spring to mind. First and foremostly we believe it of utmost importance to bust the myth that operating in LatAm is as simple as localising one's product and acquiring traffic. Affiliate marketing is still in its infancy in this region and more traditional forms of advertising are to be adopted if one intends to gain a presence.

Colombia is the only working market in LatAm adopting a European style of licensing, much like Malta and the United Kingdom. This means that most parts of LatAm are still considered to be 'grey-markets'. To top this all off, payment systems as we know them in Europe are scarce. Large parts of the gambling population do not have bank accounts or credit cards. Consumer confidence lies in the traditional forms of cash-based betting and the bigger regulated operators own or ally with land-based payment providers, enabling them to convert cash into much coveted gambling credits, to be used on their websites.

"Having local knowledge in the LATAM markets will open the door to a world of new players and possibilities"

In Brazil 57% of the entire population has a credit card, in Mexico this figure stands at 38% and in Colombia it is 28%. These numbers shrink significantly when accounting for the gambling population. Even online giants such as Netflix and Spotify sell vouchers in supermarkets in-order to enable their users to pay for their products in cash. This makes deposit taking in grey markets a major task, however within Colombia (a regulated market), for example, operators can partner with well-established and widely used payment terminals that tend to be more far reaching than most ATMs. These are not solely used for gambling but also for the payment of utility bills, phone top-ups and similar services and are a trusted go-to for the local consumer. We are therefore able to bust a second myth, that product localisation is the only key to market. Operational localisation is also a must! The tripartite approach one must adopt in order to enter these markets consists of:

- Localisation of technology, product, and platform
- Operational localisation including a land-based payment network
- Investment in traditional marketing types (TV, advertising, sports sponsorships etc.)

一提到拉美和iGAMING，我们经常面临许多监管和运营问题。在与评估进入这些市场的欧洲运营商打交道时，我们也往往需要面对这些迷思。除了与牌照成本、博弈和公司税收等监管问题外，"灰色市场"和"付款处理"这些问题也在脑中打转中。首先且最重要的就是破解这些迷思：在拉美，运营就像将产品本地化和流量获取一样简单。代理在该地区仍处于起步阶段，如果想获得影响力，得要采用更传统的广告形式。

哥伦比亚是拉美地区唯一采用欧洲许可制度的市场，就像马耳他和英国一样。这意味着拉美大部分地区仍被视为"灰色市场"。除此之外，我们于欧洲所熟悉的支付系统在这里是十分罕见的。大部分玩家没有银行帐户或信用卡。消费者信任传统的现金投注模式，较大的合法运营商若能商拥有实体支付或与实体支付供应商结盟，就能使他们将现金转换成令人垂涎的游戏点数，在其网站上使用。

"在拉美市场上只要对当地够了解，就能推开那扇充满新玩家和机会的大门"

在巴西，有57%的人口拥有信用卡，在墨西哥，这个数字是38%，在哥伦比亚则是28%。而在博弈人口方面，这些数字大幅减少。甚至像網飛和声破天这样的在线巨头也在超市中 網飛 代金券，让他们的用户能够用现金支付其产品。这使得在灰色市场上吸收存款成了一项主要任务，但是在哥伦比亚（一个受监管的市场）运营商可以与成熟合作广泛的支付终端合作，而这些终端覆盖面往往比大多数ATM机更广。这些终端不仅用于赌博，还用于支付水电费，电话充值和类似服务，并且是当地消费者信赖的选择。因此，我们能够破除第二个迷思，并意识到 产品本地化是进入市场3的唯一关键。运营本地化是必须的！为了进入这些市场，必须采取以下三方方法：

- 技术、产品和平台的本地化
- 运营本地化，包括实体支付网络
- 对传统营销类型的投资（电视广告、体育赞助等）

Our next myth also relates to localisation with most operators asking whether since they have localised for Spain, they are now ready to go-live in LatAm and whether LatAm and Spain have inter-related regulatory regimes. Given the above, it can be noted that LatAm and Spain are culturally and linguistically distant cousins, but not twins. Colombia's legal system although being similar, is a separate licensing regime from that of Spain, and therefore Spanish certification and/or a Spanish licence will entitle you to absolutely nothing in Colombia, as well as LatAm in general.

"Over regulation, market saturation and generally increasing costs in Europe have naturally led providers and operators alike to search for new frontiers in the quest for innovation and new market-share"

A further myth to bust relates to Brazil. Whilst bigger sports operators have begun sponsoring local football teams and others have acquired or partnered with locals, technical regulations are still unpublished, and this market remains in its infancy from a regulatory perspective. Also, any form of online casino gambling is illegal and therefore this market remains predominantly black. The government however scarcely conducts ISP geo-blocking. It is yet to be seen if a transitory period for licensing is applied once more detailed sports betting legislation comes into force or if all sites will be blocked up until licensing.

Mexico also has its myths and is majorly also considered a regulated market by international operators. However, its old-age regulatory regime only permits the currently licensed land-based operators to provide online services and therefore this market is essentially closed unless operators partner up with local licensed entities.

The above being said, having local knowledge in the LatAm markets will open the door to a world of new players and possibilities. We can now turn to the facts, being that Peru is the only truly grey market in LatAm with sector specific legislation still forthcoming and a government that is openly tolerant to iGaming. Together with this, Colombia is the pioneer of the sector in this region, having a European styled approach targeted at attracting local and foreign investment. Myths being busted, we now provide you with the regulatory and commercial facts concerning the Colombian iGaming market:

- State Monopoly (Concession-based, with all proceeds from taxation being allocated to the health sector).
- One licence covers all authorised verticals (casino, virtual, sports betting, live casino, with national and international liquidity poker currently being considered).
- Providers only require certification but not licensing.
- Gaming tax is 15% of GGR whilst RTP is 83%.
- The gambling population prefers a cash-based, assisted betting system whereby payments are made through land-based shops. Wide reaching networks of this type already exist in Colombia.
- The best point of entry to the market is via a sports-book product offering (this can be said of LatAm in general).
- In Colombia, one domain is permitted per licence. White-label arrangements are prohibited.
- Turnover of online games in Colombia, specifically in Jan-Feb 2020, was 261 Million Euro. This is segmented as follows:
  - €190 million from sportsbook and €71 million from online casino
  - GGR €26.5 million
  - €24 million from sports-book
  - €2.6 million from casino
- 17 licensed operators, and 3 strongest operators:
  - 41% W play
  - 40% Bet play
  - 10% Rush bet
- 3,300,000 players in a country of 48 million inhabitants, 68,2% between 15 and 65 years old.
- International and local liquidity poker are in the regulatory pipieline.

下一个迷思还是与本地化有关，大多数运营商都在问，既然他们已在西班牙市场本地化，那么现在是否可以在拉美上线，以及拉美和西班牙监管制度是否相关。据此，我们必须了解，拉美和西班牙在文化和语言上虽是"近亲"但不是“双胞胎”。哥伦比亚的法律制度虽然与西班牙相似，但却有着不同的牌照制度，因此，西班牙的认证或牌照在哥伦比亚和整个拉美地区不通用。

“过度监管，市场饱和和欧洲普遍上涨的成本促使供应商和运营商拓展新领域，寻求创新以及新的市占率”

另一个要打破的迷思与巴西有关。尽管较大的体育运营商已开始赞助当地足球队，也有体育运营商收购了当地足球队或与它们合作，但技术法规仍未公布，这样看来这个市场仍处于起步阶段。也就是说，任何形式的线上博弈都是非法的，因此，这个市场仍是黑市。然而，政府很少进行网络运营商地域限制。有待观察的是，一旦更详细的体育博弈立法生效后，是否会许可证的过渡期，或是在核可前，所有网站都将被封锁。

墨西哥市场也存在迷思，在很大程度上目前持有牌照被国际运营商视为一个受监管的市场。但是，旧的监管制度仅允许目前持有牌照的实体运营商提供在线服务，因此，除非运营商与本地的持牌实体合作，否则该市场基本上处于关闭状态。

综上所述只要拉美市场够了解，就能推开那扇充满新玩家和各种可能性的大门，我们了解到，秘鲁是拉美地区唯一真正的灰色市场，相关的立法仍在进行中，而且政府对IGAMING态度宽容。同时，哥伦比亚是该地区的产业先驱采用了欧式方法来吸引本地和外国投资。随着迷思的破除接下来将罗列哥伦比亚iGAMING市场的监管和商业相关现况：

- 国家垄断（以特许权为基础，所有税收收入均分配给卫生部门）。
- 一份牌照涵盖所有授权的垂直领域（赌场、虚拟游戏、体育博弈、真人娱乐场，目前正在考虑国内和国际扑克流动性）。
- 供应商仅需要认证，而无需牌照。
- 博弈税占总博弈营收（GGR）的15%，而玩家回报率（RTP）为83%。
- 赌博人群更喜欢以现金为基础的辅助投注系统，该系统通过实体商店进行付款。哥伦比亚已存在这种广泛覆盖的网络。
- 进入市场的最佳点是通过体育博弈产品（适用于大部分的拉美地区）。
- 在哥伦比亚，一张牌照只能使用一个域名，不能共用。
- 哥伦比亚线上博弈的营业额（特别是2020年1月至2月）为2.61亿欧元。具体可分为以下方面：
  - 体育博弈为1.9亿欧元，线上赌场为7100万欧元
  - 总博弈营收（GGR）为2650万欧元
  - 体育博弈为2400万欧元
  - 赌场为260万欧元
- 17家持照运营商，其中3家最大的运营商：
  - W PLAY占41%
  - BET PLAY占40%
  - RUSH BET占10%
- 这 一个拥有4800万居民的国家中，有3,300,000名玩家，年龄在15至65岁之间的占68,2%。
- 国际与本地扑克流动性相关监管制定正在进行中。