

CMS | Romanian gambling regulator defines significant changes in licence conditions requiring regulator notification Romania



The Romanian National Office for Gambling (NOG) recently issued Order no. 33/2025, which defines the “significant” changes in the initial data used by a gambling operator to obtain a Class I or Class II licence that operators must report to the NOG.

The Order refers to an amendment in gambling legislation passed in July 2022 that requires both gambling operators (Class I licensees) and operators providing ancillary services to the gambling industry (Class II licensees, providing ancillary services such as payment processing, marketing, audit and certification services, etc.) to notify the NOG of “significant change” to the initial data used to obtain a licence. The NOG was then tasked with issuing secondary legislation defining the scope of the “significant changes” requiring NOG notification, which is contained in the recent Order.

The information that gambling operators must report now include:

- o any changes to gaming equipment: any ensemble of elements, including the IT system consisting of software, hardware and communication means, which services or allows for the organisation, conduct and participation in gambling activities, to the extent it independently generates random elements for gambling activities or such a destination is set out by the manufacturer;
- o any change to the identification data of the ultimate beneficial owner of the licence holder;
- o any change in the director or authorised representative and the shareholders of the licensee or their identification data;
- o any change in the registered office, name or share capital of the licence holder;
- o any change in the criminal record data of the directors or legal representatives to the extent such changes refer to matters, which would result in an incompatibility to hold such positions within a licence holder;
- o any withdrawal or revocation of any approval issued by police authorities to the directors, shareholders or authorised representative of the licence holder;
- o any change to any contracts concluded with providers of ancillary services.

These changes came into effect upon publication of the NOG Order no. 33/2025 in the Official Gazette on 21

March 2025. Companies holding Class I or Class II licences issued by the NOG are advised to keep track of these changes since failure to notify these changes to the NOG in a timely and accurate fashion could result in fines.

For more information on this Order and Romania's gambling sector, contact your CMS client partner or this CMS expert **Cristina Popescu**.