Brazil

Online casino launch roadmap

Ministry of Finance, Secretariat of Prizes and Betting (SPA/MF)

Brazil built the biggest new regulated market in years, then on 25 September 2026 a provisional measure banned fixed-odds betting nationwide, so today this roadmap is a plan you can prepare but not execute.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	SETUP COST	LOCAL PRESENCE	DIFFICULTY
SPA authorization (portaria) under Lei…	Not launchable now. Before the ban: about 6-12 months…	GGR tax 13% in 2026, 14% in 2027, 15% in 2028 (Lei…	BRL 30M authorization grant (5 years) + BRL 30M paid-in…	Brazilian legal entity with HQ and administration in…	Blocked by law today; very high if the ban is lifted

- MP 1.394/2026 fixed-odds ban 1.1
- Congress and STF track 1.3
- Does it reach online casino games? 1.2
- Decide: wait, prepare, or redirect 1.4

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- Tax model on GGR 2.3
- Model the cash gates 2.2
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- Geolocation and sessions 5.5
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STAGE 5 · Months 3-9
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- Segregation and reserve 6.3
- Illegal-operator payment blocks 6.5
- No credit cards 6.2
- Pix idempotency and chargebacks 6.4

STAGE 6 · Months 3-8
Payments and player funds

- Accredited certifier selection 7.1
- SIGAP sandbox and pre-launch audit 7.3
- Platform plus per-game certification 7.2

STAGE 7 · Months 4-10
Certification and testing

- Controlled launch checklist 8.1
- Inspection fee and reporting 8.3
- Monthly tax and destinations 8.2
- Wind-down duties under the MP 8.4

STAGE 8 · Launch and after
Go-live and ongoing duties

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Brazil: launch roadmap in detail

Ministry of Finance, Secretariat of Prizes and Betting (SPA/MF) · as of 2026-11

Licence	SPA authorization (portaria) under Lei 14.790/2023, up to 3 brands per grant. New grants barred and existing ones extinguished by MP 1.394/2026
Time to launch	Not launchable now. Before the ban: about 6-12 months, with an SPA review of up to 150 days
Gaming tax	GGR tax 13% in 2026, 14% in 2027, 15% in 2028 (Lei Complementar 224/2025); moot while the ban stands
Setup cost	BRL 30M authorization grant (5 years) + BRL 30M paid-in capital + BRL 5M financial reserve
Local presence	Brazilian legal entity with HQ and administration in Brazil, at least 20% Brazilian ownership
Difficulty	Blocked by law today; very high if the ban is lifted

1. Legal status gate Before any spend

1.1 MP 1.394/2026 fixed-odds ban RECOMMENDED

Published 25 September 2026, it bans operating, offering, intermediating and advertising fixed-odds betting, including by foreign operators. Sites and apps had to go dark within 10 days and authorizations ended 30 days after publication, with no refund of the grant. It repeals most of Lei 14.790 (arts. 1-21, 22-24, 25-40, 43-48, 54). Read the MP text itself, not summaries.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation

1.2 Does it reach online casino games? RECOMMENDED

The MP does not say casino. It covers bets on real sports and on virtual events of online games, and defines an online game as an electronic channel for betting on a game whose result depends on a random generator (art. 1 and art. 3, III). Get a written legal opinion on your specific RNG and live-dealer products before assuming anything is outside it.

In the book: Ch. 06 Licensing Guide, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation

1.3 Congress and STF track RECOMMENDED

Congress extended the MP by 60 days on 11 November 2026; press reports put the lapse date at 4 March 2027, which we could not confirm on an official page. Four ADIs (8024, 8027, 8028, 8035) are pending at the STF, and on 8-9 November Justice Fux suspended related lower-court cases nationwide until the plenary rules. Separately, ADIs 7721 and 7723 (CNC, Solidariedade) and 7749 (PGR) challenge Lei 14.790 itself; in August 2026 Fux ordered them judged together on an abbreviated track, and no merits ruling was found as of November. Interim STF measures from November 2024 (no new registrations of social program beneficiaries, no betting ads aimed at minors) stay in place. Track Congress, the STF and the SPA page weekly.

In the book: Ch. 40 Case Study -- Launching in a New Regulated Market

1.4 Decide: wait, prepare, or redirect ALTERNATIVE

The cheap option is to prepare the entity, vendor shortlist and architecture but hold the BRL 30M grant. The other option is to put launch capital into Colombia, Mexico or Buenos Aires first. Do not pay anyone for an authorization promise while the MP is in force.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline, Ch. 40 Case Study -- Launching in a New Regulated Market

2. Feasibility and perimeter (pre-ban regime) Weeks 0-6

2.1 Map products to the legal perimeter RECOMMENDED

Under Lei 14.790 the regime covered sports betting, virtual sports and qualifying online games. Classify every market, RNG game and live game. Portaria SPA/MF 1.207/2024 governs online games and live studios, and each game needed its own certification. Land-based casinos stayed prohibited.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 05 Differences Between Betting Sites and Online Casinos

2.2 Model the cash gates RECOMMENDED

Portaria SPA/MF 827/2024 stacked a BRL 30M authorization grant for 5 years, BRL 30M paid-in cash capital, BRL 30M minimum net worth and a BRL 5M financial reserve. SPA opinions cite different capital figures for additional brands, so confirm the current amount before you budget.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline

2.3 Tax model on GGR RECOMMENDED

Lei Complementar 224/2025 (published 26 December 2025) raised the GGR rate from 12% to 13% in 2026, 14% in 2027 and 15% in 2028. Sources differ on the exact 2026 start month. The 18% GGR rate in MP 1.303/2025 was dropped from the committee text and the MP lapsed on 9 October 2025 without a floor vote, so it never took effect. Several Senate bills would raise taxes further.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 30 FinOps Deep Dive

2.4 Unit economics at saturated CAC OPTIONAL

The book's tier-1 curve assumed a gold-rush window of 18-24 months. With the ban, that window is gone or delayed, so rebuild the model with a launch date at least a year out and European-level acquisition costs.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 30 FinOps Deep Dive

3. Corporate and authorization Months 1-6

3.1 Brazilian entity and ownership RECOMMENDED

A foreign parent cannot take bets directly. The applicant is a Brazilian company with HQ and administration in Brazil, a compliant corporate purpose and CNAE, and at least 20% Brazilian ownership. Beneficial owners are disclosed down to 5% holders.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 09 Legal Framework and Contracts

3.2 Integrity checks on people RECOMMENDED

Controllers, beneficial owners and administrators go through suitability review under Portaria 827/2024 (art. 10 on suitability, art. 14 on lawful origin of funds and capital paid in). Prepare source-of-funds evidence early, it is the slowest item.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 24d KYC Evidence Lifecycle

3.3 SIGAP dossier and review RECOMMENDED

The request is filed through SIGAP with five evidence groups: legal, tax and labour regularity, integrity, economic capacity, and technical capacity. SPA states up to 150 days for a complete file. Changes to the conditions that justified the grant must be reported (IN SPA/MF 35/2025).

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 25b Regulatory Reporting and Evidence Export

3.4 Pay the grant and activate brands RECOMMENDED

The BRL 30M grant is paid after approval. One authorization covers up to three brands, each with its own .bet.br domain. Under MP 1.394 the grant is not refunded when authorizations end, which is the real risk of paying early.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 06 Licensing Guide

4. Platform and suppliers Months 2-8

4.1 SIGAP data feeds RECOMMENDED

Portaria SPA/MF 722/2024 sets the rules for betting systems and the data they send to SIGAP: generation, signing, delivery, rejection handling and reconciliation. Build this as a first-class service, not a reporting afterthought.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 25b Regulatory Reporting and Evidence Export

4.2 Hosting and data location RECOMMENDED

The simplest design keeps authoritative regulated data and cryptographic controls in Brazil. Foreign hosting is not categorically banned but carries conditions, so test your design with counsel. LGPD applies on top.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent, Ch. 29f Latin America Datacenter Infrastructure for Regulated Gaming

4.3 Supplier onboarding RECOMMENDED

Every game and live studio supplier needs certification recognized by SPA and a contract that gives you audit and data rights. Build the supplier control plane before signing 20 studios.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 09 Legal Framework and Contracts

4.4 The .bet.br domain per brand RECOMMENDED

Domain registration and use are governed by IN SPA/MF 11/2024. Plan DNS, certificates and redirect hygiene per brand, and keep non-regulated domains away from the same infrastructure.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent

4.5 Portuguese-only player surfaces OPTIONAL

Player-facing screens, limits and notices need Brazilian Portuguese. Budget translation and legal review of every responsible gaming string.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 26 Responsible Gaming and Player Protection Systems

5. Compliance controls Months 3-9

5.1 CPF and facial identity RECOMMENDED

Verify CPF, age and a facial match with liveness at registration. The law requires facial identification and authentic identity evidence but not one specific vendor, so keep auditable evidence of the method.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation

5.2 Impediments and self-exclusion RECOMMENDED

Query the SIGAP impediments API by CPF at onboarding, at first login each day and at least every 15 days across the base. Centralized self-exclusion (Portaria 2.579/2025, IN 31/2025) and social program beneficiaries such as Bolsa Familia and BPC are hard blocks.

In the book: Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation

5.3 AML under Portaria 1.143/2024 RECOMMENDED

Risk-based program covering identification, PEP screening, monitoring, and reporting through Siscoaf (access set by IN SPA/MF 4/2024). Name an accountable officer and keep evidence for audits.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 19 Anti-Fraud System Deep Dive

5.4 Responsible gaming rules RECOMMENDED

Portaria 1.231/2024 is the long one: deposit and loss limits, session reminders, cooling-off, and advertising rules, amended repeatedly in 2025 and 2026. Consumer-protection rules for advertising followed in Interministerial Portaria 73/2026.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 37 Marketing Technology and CRM Systems

5.5 Geolocation and sessions RECOMMENDED

Block play from outside Brazil and handle VPN and proxy traffic. The chapter 46 stack uses device and network checks alongside CPF-bound sessions.

In the book: Ch. 24e Geofencing and Location Verification, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation

6. Payments and player funds Months 3-8

6.1 Registered account only RECOMMENDED

Portaria SPA/MF 615/2024 and 1.231/2024 require money to move through a bank or prepaid account held in the bettor's own name. Verify ownership, store account identifiers, and return deposits from third-party accounts. Pix dominates in practice but the ordinances do not make it the only permitted rail.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 36 Financial Operations

6.2 No credit cards RECOMMENDED

Credit cards are banned. Reject card BINs on the server, not just in the UI.

In the book: Ch. 36 Financial Operations, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation

6.3 Segregation and reserve RECOMMENDED

Keep player funds in a segregated account at a Brazilian institution, reconcile daily, and hold the BRL 5M financial reserve. IN SPA/MF 32/2026 now governs reserve movements for operators ending under the MP.

In the book: Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 36 Financial Operations

6.4 Pix idempotency and chargebacks RECOMMENDED

Use a reference id per deposit so retried webhooks never double-credit. Pix refund requests and disputes need a defined support path.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 33d Disputes, Chargebacks, and Player Support

6.5 Illegal-operator payment blocks OPTIONAL

Portaria SPA/MF 2.750/2026 (10 September 2026) pushes banks to identify and stop payments tied to illegal betting. Expect your PSPs to ask harder questions about your authorization status.

In the book: Ch. 36 Financial Operations, Ch. 19 Anti-Fraud System Deep Dive

7. Certification and testing Months 4-10

7.1 Accredited certifier selection RECOMMENDED

Portaria SPA/MF 300/2024 set accreditation rules and SPA accredits labs by portaria. Trisigma's accreditation was revoked in November 2025 (Portaria 2.684), a reminder to check the live list before you sign.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 17 Random Number Generation (RNG)

7.2 Platform plus per-game certification RECOMMENDED

Certify the platform and each applicable game. In April 2025 SPA suspended provisional authorizations of four companies over missing certifications (Portaria 787/2025), so do not launch on a promise.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 32 Testing and QA in Gambling

7.3 SIGAP sandbox and pre-launch audit RECOMMENDED

Prove SIGAP delivery in the sandbox, then expect a technical review before go-live. Annual penetration testing and change notifications are part of the operating rules.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 32 Testing and QA in Gambling

8. Go-live and ongoing duties Launch and after

8.1 Controlled launch checklist RECOMMENDED

Validate payments, wagering, exclusions, reporting, reconciliation, DR and support end to end before opening to the public.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 33 Operational Playbooks, Ch. 35 Incident Management

8.2 Monthly tax and destinations RECOMMENDED

Pay GGR tax and the legal destinations by DARF code (Portaria 1.212/2024 as amended, including May 2026 and the Health Ministry code from August 2025). Joint tax liability for third parties was regulated in Portaria MF 1.766/2026.

In the book: Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 36 Financial Operations

8.3 Inspection fee and reporting RECOMMENDED

An SPA inspection fee applies by GGR band; a February 2025 notice cited BRL 54,419.56 to BRL 1,944,000.00 monthly, which may be outdated. Keep SIGAP reporting and evidence exports ready for audit.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation

8.4 Wind-down duties under the MP RECOMMENDED

If you hold a grant today, Portaria SPA/MF 3.005/2026 (2 October 2026) sets the procedures, deadlines and obligations for authorizations that end, and the MP requires refunds of open bets and balances to the player's own account within days.

In the book: Ch. 36 Financial Operations, Ch. 33 Operational Playbooks

Common pitfalls

- Paying the BRL 30M grant on a hopeful reading of the ban. The MP gives no refund when authorizations end.
- Assuming online casino is outside the MP. The text defines online games by RNG outcome and covers bets on virtual events of those games.
- Treating Pix as mandatory. The ordinances require the bettor's own registered account and ban credit cards, but they do not name one rail.

- Reading the STF as the safety net. ADIs 7721, 7723 and 7749 attack Lei 14.790 itself and are still pending, and the MP ban has its own four ADIs.
- Believing a lower-court injunction protects you. Several were reversed, and the STF suspended these cases nationwide on 8-9 November 2026.
- Using a lab whose accreditation can change. SPA revoked one in November 2025.
- Skipping the impediments API. Social program beneficiaries and centralized self-exclusion are hard blocks. Planning on a 2024-2025 tax rate. The GGR rate rises each year through 2028 under LC 224/2025.

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