

# Gambling Availability and Advertising in Canada

A CALL TO ACTION



Canadian Centre  
on Substance Use  
and Addiction

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### Project Partner



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CCSA, 500–75 Albert Street  
Ottawa, ON K1P 5E7  
613-235-4048  
[info@ccsa.ca](mailto:info@ccsa.ca)

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# Conflict of Interest

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**Matthew M. Young** is Chief Research Officer at Greo Evidence Insights, Senior Research Associate with the Canadian Centre on Substance Use and Addiction, and Adjunct Research Professor of Psychology at Carleton University. He does not report any potential conflicts of interest in relation to gambling or the gambling industry.

**Sheila McKnight** is Senior Knowledge Broker at Greo Evidence Insights. She does not report any potential conflicts of interest in relation to gambling or the gambling industry.

**Sasha Stark** is the Director of Research and Evidence Services at Greo Evidence Insights. Before 2022, she was employed at the Responsible Gambling Council, where in the past five years she worked on projects funded by the Alcohol and Gaming Commission of Ontario (Canada), Carleton University (Canada), Greo Evidence Insights (Canada and / U.K.United Kingdom), the International Center for Responsible Gaming (U.S.United States), International Center for Gaming Regulation at the University of Nevada Las Vegas (U.S.United States), MGM Resorts International (U.S.United States), GambleAware (U.K.United Kingdom), Camelot Group (U.K.United Kingdom), and Playtech (U.K.United Kingdom).

**Lindsay Kalbfleisch** is Director of Stakeholder Engagement at Greo Evidence Insights. She does not report any potential conflicts of interest in relation to gambling or the gambling industry.

**Corrine Leon** is Senior Knowledge Broker at Greo Evidence Insights. She does not report any potential conflicts of interest in relation to gambling or the gambling industry.

**Elizabeth Lusk** is Chief Strategy Officer and Acting Director of Evaluation Services at Greo Evidence



Insights. She does not report any potential conflicts of interest in relation to gambling or the gambling industry.

**Trudy Smit Quosai** is Chief Executive Officer at Greo Evidence Insights. She does not report any potential conflicts of interest in relation to gambling or the gambling industry.

## Executive Summary

In 2021, the Canadian Senate approved *Bill C-218, the Safe and Regulated Sports Betting Act*, an amendment to the *Criminal Code*, which gives provinces and territories discretion to conduct and manage single-event sports betting in their jurisdictions. In response, most provinces and territories began offering in-person single-event sports betting through Crown lottery corporations. Nine provinces also began offering online single-event sports betting through Crown corporations, and Ontario opened its online market to privately owned gambling companies such as Bet365 and DraftKings to offer sports betting and other forms of online gambling.

The legalization of single-event sports betting and the opening of the Ontario online market resulted in a sudden increase in opportunities to legally gamble. As of December 2023, 49 different gambling companies were operating 72 different gambling websites in Ontario alone. Since these policy changes, Canadians across all provinces and territories have also witnessed an appreciable rise in gambling advertising. This increase has been most noticeable through the promotion of sports betting during breaks in live sports broadcasts, including during the broadcast itself.

The impact of these significant changes in gambling policy on the health of Canadians is largely unknown as there is no national or provincial/territorial monitoring and surveillance of gambling-related harm. The last national, publicly available, assessment of gambling participation and harm was in 2018. Results from this survey indicated that between 2002 and 2018, rates of gambling and problem gambling in Canada were declining.

The increase in opportunities to legally gamble and the increase in gambling advertising in Canada is cause for concern because of the following considerations:

1. Early evidence suggests the changes have resulted in **increased gambling participation**, which has been associated with increased gambling-related harms among the general population and among youth, young adults and other vulnerable populations.
2. The **type of gambling being made available** and promoted (single-event sports betting and live or “in-play” betting) is associated with greater risk of harm.
3. The volume of gambling advertisements repeatedly pairing sports with betting and featuring celebrity endorsements “**normalizes**” **gambling**, leading people to think of betting as an integral part of sports and by extension a healthy, “normal” behaviour. This normalization is especially a concern for youth and young adults who are at greater risk of harm.
4. The increase in opportunities to legally gamble and the increase in gambling advertising occur at a time when many Canadians are **more vulnerable** to problematic gambling and gambling-related harms because of the lingering health impacts of COVID-19 and a rise in the cost of living.

In response to these concerns, this report recommends a national independent organization, such as the Canadian Centre on Substance Use and Addiction, convene stakeholders **to develop a pan-Canadian**



**strategy to address gambling-related harm.** Federal, provincial and territorial Crown corporations and regulators, public health practitioners, researchers, people affected by gambling harms and other concerned individuals should be consulted to develop a national strategy to guide regulatory, health promotion, prevention, treatment, research and enforcement efforts to respond to the expected increase in gambling-related harms. This strategy must address:

- The need for **national standards** governing the promotion and availability of gambling;
- Problematic **conflicts of interest** among gambling stakeholders;
- Inadequate **funding for gambling harm prevention and reduction initiatives and research** across jurisdictions;
- The absence of any **systematic monitoring of changes in gambling-related harm**, including any assessments of the social and economic costs of gambling; and
- The need to **increase awareness of gambling-related harms** among health and social service professionals and the public.

National gambling strategies have been developed in other countries (Government of the United Kingdom, Gambling Commission, 2019) and Canadian strategies have been developed for addictive products such as alcohol (National Alcohol Strategy Working Group, 2007), tobacco (Government of Canada, 2023) and opioids (National Advisory Council on Prescription Drug Misuse, 2013).

This report describes the policy changes that led to the increase in gambling availability and advertising, analyses why the increase in legal opportunities to gamble and the increase in gambling advertising in Canada is cause for concern and argues for the need for a national strategy.



# Introduction

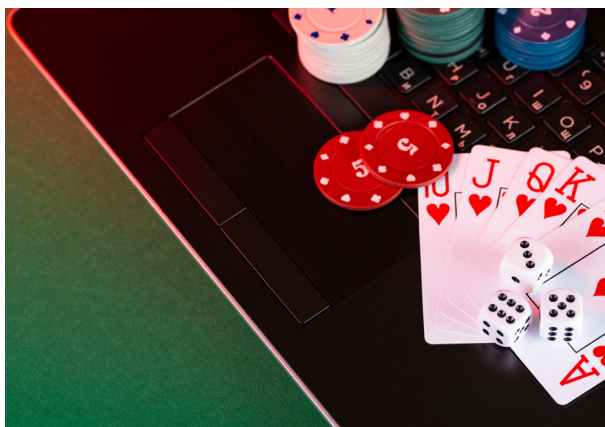
Since 2021, federal, provincial and territorial policy changes have resulted in Canadians being offered increased opportunities to legally gamble. People have been provided more opportunities to bet on sports and gamble online, 24 hours a day, seven days a week. Accompanying these new opportunities, Canadians have witnessed a significant increase in gambling advertising. The increase has been most notable for sports betting during commercial breaks in live sports, including promotions during the broadcast itself. More promotion of gambling has also been seen in sports venues and on team uniforms.

**Increased opportunities to legally gamble and increased gambling advertising are likely to result in short- and long-term gambling-related harms among Canadians, especially youth, young adults and other vulnerable populations. However, the notable lack of national or provincial/territorial monitoring and surveillance of gambling-related harms means that the impact of these large changes in gambling policy on the health of Canadians will be largely unknown.**

In response to anticipated increases in gambling-related harm, concerned groups have started advocating for policy changes aimed at protecting young people and some restrictions on advertising and marketing in Ontario have already been announced (Alcohol and Gaming Commission of Ontario, 2023).

Before Canada loosened regulations on the sports betting and online gambling markets, other countries that had liberalized gambling markets had already become concerned about the impact that increased gambling availability and gambling advertising could have on the health of youth, young adults and other vulnerable populations. These countries have revisited their regulations and begun placing limits on gambling advertising with the aim of preventing increases in gambling-related harm. (See Table 1 for a list of these countries and the regulatory changes they have implemented.)

This report describes the policy changes in Canada that led to the increase in gambling availability and advertising; analyses why these changes are likely to increase gambling participation and gambling-related harms and why we might not notice such increases as they happen; and argues for a national framework to address and prevent harms associated with gambling in Canada.



# Policy Changes that Led to Increases in Legal Gambling Availability and Gambling Advertising

The increase in opportunities to legally gamble and the increase in gambling advertising in Canada are the result of two policy changes, one federal and one provincial. Federally, on June 22, 2021, the Canadian Senate approved *Bill C-218, the Safe and Regulated Sports Betting Act*, which gives provinces and territories discretion to conduct and manage single-event sports betting in their jurisdictions. In response, most provinces and territories began offering retail, in-person, single-event sports betting and nine provinces began offering online, single-event sports betting through government-owned gambling providers (Crown corporations). Additionally, in 2020 the Ontario government announced the law would be amended to allow the Alcohol and Gaming Commission of Ontario to conduct and manage online gambling through a dedicated subsidiary organization, iGaming Ontario, while continuing its role as regulator. These federal and provincial policy changes set the stage for privately owned companies to begin offering online gambling opportunities in Ontario. In April 2022, the Ontario market was opened to allow large, privately owned, international gambling corporations such as Bet365 and DraftKings to offer online gambling, including sports betting. As part of their operating licence, they were also permitted to advertise these products in the Ontario market. Before the provincial policy change, privately owned gambling companies were only able to promote their free-to-play websites and the only way to legally gamble online was through the Ontario Lottery and Gaming Corporation, the provincial Crown lottery corporation. In the other jurisdictions the only way to legally gamble online remains via the Crown lottery corporations.

The expansion of the Ontario gambling market to include newer ways of gambling, such as single-event sports betting, through privately owned gambling corporations has created an environment in which gambling companies are competing for customers. This competition has resulted in an appreciable increase in gambling advertising in Ontario (Morasch, 2023) and an increase in gambling participation among Ontarians.

According to iGaming Ontario, in its first year of operation (April 4, 2022, to March 31, 2023) \$35.5 billion was wagered on online sites registered in Ontario (2023). Such a large sum cannot be explained simply by a movement of people from illegal to legal online gambling. Given that illegal online gambling in Ontario was estimated to involve approximately 1.5 per cent of the population in 2018 (Mackey-Simpkin et al., 2023), each Ontarian engaged in illegal online gambling before the policy change would have had to be wagering more than \$200,000 a year to account for \$35.5 billion in wagers.<sup>1</sup> This does not seem plausible. Further, the amount wagered by Ontarians is increasing. The total amount wagered by Ontarians increased more than 300 per cent since the market was opened from \$4.08 billion in Q1 of FY 2022–23 (iGaming Ontario, 2022) to \$17.8 billion in Q4 of FY 2023–24 (iGaming Ontario, 2024). In its second year (FY 2023–24) \$63 billion was wagered.

Although a decision by the Ontario government for people living in the province of Ontario, these changes

<sup>1</sup> The population of Ontarians aged 19 years and older in 2021 (last Canadian census) was 11,170,692. The proportion of the Ontario population that engaged in illegal gambling in 2018 is estimated to be 1.5% or approximately 167,560 Ontarians. If the \$35.5 billion wagered in FY 2022–23 was simply a shift from illegal gambling to legal online gambling, then before April 2022 each Ontarian engaged in illegal gambling would have been spending \$211,864 per year on illegal gambling sites.





have impacted people living in other provinces and territories. Privately owned gambling corporations are not permitted to operate or advertise their real-money gambling websites from physical locations in these provinces and territories. However, since the internet is borderless, gambling advertisements associated with content originating from Ontario and some U.S. states (where single-event sports betting was also recently legalized) are being consumed by people living in other jurisdictions that have access to this content. This advertising combined with increased advertising by government-owned operators has resulted in a noticeable increase in gambling advertising (Morasch, 2023).

In response to the proliferation of gambling advertising and the anticipated impact on public health, some advocacy groups and not-for-profits have begun lobbying to ban gambling advertising ([BanAdsForGambling.ca](https://banadsforgambling.ca), n.d.; Canadian Mental Health Association, 2023). In Ontario, where market liberalization has led to the largest impacts, the Centre for Addiction and Mental Health (CAMH) has called on Ontario to rethink its approach to gambling policy (Centre for Addiction and Mental Health, 2024) and the Alcohol and Gaming Commission of Ontario has updated the *Registrar's Standards for Internet Gaming* to prohibit the use of athletes and restrict the use of celebrities in advertising and marketing for internet gaming in Ontario. These new provincial standards, intended to limit the appeal of such advertisements to minors, came into effect on February 28, 2024 (Alcohol and Gaming Commission of Ontario, n.d., 2023). At the federal level, in June 2023, a senator in the federal government introduced a private members bill to address advertising for sports betting in Canada (National Framework on Advertising for Sports Betting Act, 2023). The bill has passed second reading in the Senate.



# Why More Opportunities to Legally Gamble and Increased Gambling Advertising in Canada Are Cause for Concern

The increase in opportunities to legally gamble and the increase in gambling advertising in Canada is cause for concern because of the following considerations:

1. There is a potential for **increased gambling participation and increased gambling-related harm**;
2. The **type of gambling being promoted** (single-event sports betting and live or “in-play” betting) is associated with greater risk of harm;
3. The **“normalization” of gambling** leads to gambling being seen as healthy, “normal” behaviour that “everybody” engages in; and
4. The increase in opportunities to legally gamble and the increase in gambling advertising occur at a time when the Canadian population is **more vulnerable** to gambling-related harms because of the aftereffects of the global pandemic and challenges associated with cost-of-living increases.

## Potential for Increased Gambling Participation and Increased Gambling-Related Harm

The last two national population prevalence studies of gambling found that between 2002 and 2018 the proportion of people living in Canada who gambled (77.7 per cent vs 66.2 per cent) and those experiencing problem gambling (1.1 per cent vs. 0.6 per cent) were decreasing (Williams et al., 2021). It is unclear how rates have changed since the policy changes described in the previous section. Increased exposure to gambling advertising combined with the ability to place bets 24 hours a day, no matter where you are, can be reasonably expected to increase both the number of people who gamble and their level of involvement in gambling. The limited data available support this expectation.

As the previous section notes, figures from Ontario show that the total amount wagered from Q1 of FY 2022–23 to Q3 of FY 2023–24 increased by over 300 per cent. This increase is concerning, as there is evidence that, like alcohol (Levesque et al., 2023), the likelihood of experiencing a wide range of gambling-related harms, including financial, relationship and emotional distress, health problems, criminal involvement and other harms (Browne et al., 2016), is related to gambling participation both at the individual level (Hodgins et al., 2022; Young et al., 2021; Young et al., 2022) and at the population level (Kesaite et al., 2023; Rossow, 2019). Gambling harms are distributed across the entire population of people who gamble, their families and their communities (Williams et al., 2021). We should expect increases in gambling harms among the general population to accompany the increases in gambling availability and gambling advertising. Early available data suggests this is the case. Turner et al. (2023) found that the number of people who called the



Ontario Problem Gambling Helpline for problems related to online gambling increased significantly following the expansion of the Ontario online gambling market, surpassing by a wide margin the number of calls for problems associated with electronic gaming machines (Turner et al., 2023).

## Among Youth and Young Adults

In many Canadian jurisdictions, regulations prohibit gambling advertisements from targeting or appealing to people who are underage, from appearing in media and venues where most of the audience are minors, and from being placed close to schools or other youth-oriented locations (Alcohol and Gaming Commission of Ontario, n.d.; Alberta Gaming, Liquor and Cannabis, 2023; Government of British Columbia, Gaming Policy and Enforcement Branch, 2015; Loto-Québec, 2014; Saskatchewan Liquor and Gaming Authority, 2022). However, youth watch sports and so, even though not targeted at youth, it can be assumed that many minors are being exposed to gambling advertising while watching sports or other events supported by gambling advertising. Additionally, young people often encounter advertising as sponsored posts on social media platforms where there are the fewest protective measures (Hernández-Ruiz & Gutiérrez, 2021; Hudders et al., 2021; Killick & Griffiths, 2022). As a result, youth and young adults are undoubtedly being exposed to gambling advertising at unprecedented levels. Such exposure puts youth and young adults at increased risk of harm (Pechmann et al., 2005; Wardle et al., 2022).

## Among Other Populations

Apart from youth and young adults, there are other groups of people in Canada who are at higher risk of harm from the recent expansion of gambling. Some cultural minority groups, such as South Asians, Indigenous people and East Asians, have been identified as being at increased risk when it comes to sports betting, as well as other forms of gambling (Responsible Gambling Council, 2021a, 2021b). In one of the few studies conducted since the emergence of single-event sports betting in Ontario, Vieira and colleagues (2022) found that people of colour and Indigenous people were more likely to engage in live betting than other groups, and that people who engaged in live betting experienced greater levels of problem gambling and harm than people who bet on game outcomes or make parlay bets. These findings are concerning, and more research is required to better understand the unique vulnerabilities possibly associated with these groups.

# The Type of Gambling Promoted Is Associated with Increased Risk of Harm

Increased opportunities to legally gamble and the increase in gambling advertising have been driven by the legalization of single-event sports betting. There is evidence to suggest that single-event sports betting is associated with an elevated risk of harm compared to the type of sports betting that was available before regulatory changes (parlay betting) and compared with other forms of gambling (e.g., lotteries) for two main reasons:

1. Single-event sports betting promotes increased **gambling intensity**, that is, increased gambling frequency and expenditure; and
2. Single-event sports betting promotes an **illusion of control** over the outcome, as people believe their knowledge of the game gives them a competitive edge.





A note on terminology: There are several forms of single-event sports betting. These include moneyline bets, point spread bets and over/under bets. Single-event sports betting also includes live or “in-play” betting, micro-betting, proposition betting or variations of these forms of betting. This report uses the term “single-event sports betting” to refer to all types of betting listed above and will use specific terms, such as “live betting” (bets that are placed after the start of a game), if referring to specific types of betting.

## Gambling Intensity

Before the approval of *Bill C-218*, the only legally available option to bet on sports was parlay sports betting. Parlay sports betting requires people to place a single bet on the outcome of at least two events, such as two or more hockey games or the winner of a series of games. This type of betting effectively creates a waiting period between when someone places a bet and when that person knows the outcome of their bet. As a result, parlay sports betting is like playing a lottery: one buys a ticket then waits for the draw. In contrast, single-event sports betting, which includes live and micro-betting (betting on standalone outcomes in a game such as who will score the next goal), creates the opportunity to bet multiple times on single outcomes within a particular game or competition.

This change in the permitted type of betting has two important impacts. First, there are now multiple events within a single game that can be wagered on. For example, not only can one bet on the outcome of the game, but also on who will win the coin toss or the next faceoff, which team gets the first penalty and many other events within a single game. Second, the time between placing the bet and knowing the outcome is shortened considerably—sometimes to just a few minutes or even seconds. As a result, people engaged in single-event sports betting now can bet more often and spend more money in a shorter amount of time. While parlay betting was like the lottery, single-event sports betting, including live and micro-betting, is more akin to gambling on an electronic gambling machine, such as a video lottery terminal or a slot machine (Parke & Parke, 2019; Russel et al., 2019).

## Illusion of Control

While lottery terminals and slot machines are based on pure chance, sports betting is like poker: some game knowledge helps to improve one’s probabilities. However, like other forms of gambling, the system is set up so that most people lose money in the long run and for most people sports betting is not profitable. Sports betting products are crafted so that one’s knowledge of sports plays a limited role in the outcome of sports bets (Cantinotti et al., 2004). Despite this fact, there are many aspects of sports betting products that emphasize the role of knowledge. There are features such as cash out, which enable a bettor to terminate an original bet for a smaller profit if it is winning or a less significant loss if it is losing, and accumulators, which enable a bettor to combine multiple outcomes in a single bet to potentially increase returns. These features can give people the illusion that they have more control over the outcome of their bets.

Advertising for sports betting often emphasizes people’s capacity for knowledge and control (Lopez-Gonzalez et al., 2018). It contributes to the illusion of control by emphasizing the role knowledge plays in betting and how betting with a particular brand or provider can increase a person’s chances of winning. Such advertising can give people unrealistic expectations and lead them to incorrectly assume that if they are losing, they simply need to try harder or become more knowledgeable. These features of sports betting and advertising encourage people to bet more frequently and spend more money (Hing et al., 2016), actions that predict gambling harm (Hodgins et al., 2022).



## The Normalization of Gambling

Advertising and marketing help to shape people’s perceptions of and attitudes toward gambling. The repeated association of a healthy behaviour such as sports with gambling can result in the false perception that gambling is also a healthy behaviour that everyone engages in, thus contributing to the “normalization” of the activity (Binde, 2014; Deans et al., 2016; Deans et al., 2017; Torrance et al., 2021).

This integration of gambling and sports implicitly communicates to fans that betting is an essential part of sports (Deans et al., 2017; Hing et al., 2014). Advertisements imply that betting on sports enhances excitement and is integral to being a “good” fan and engaging with professional sports. Contributing to this normalization, gambling content is increasingly being included with sports news or related information (Gainsbury et al., 2015). For example, gambling promotions and discussion of odds are integrated in-game by broadcasters and commentators.

Similarly, sponsorship of sports teams and athletes by gambling companies provides the companies opportunities to enhance brand recognition and appeal (Deans et al., 2017; Hing et al., 2014). Even “responsible” gambling messages produced by gambling operators—often required by regulators — frequently include the brand name and logo, hence reinforcing brand recognition. Celebrity endorsements of gambling products or brands also serve to strengthen the connection between gambling and sports. Such endorsements are particularly concerning given that young people often look to popular athletes as role models (Monaghan et al., 2008).

Finally, gambling advertising tends to highlight the positive sides of gambling (Binde, 2014; Deans et al., 2016; Deans et al., 2017; Torrance et al., 2021). Advertisements often depict people winning while with friends and use humorous narratives that create a light tone (Guillou-Landreat et al., 2021; Killick & Griffiths, 2020, 2022; Newall et al., 2019). However, emerging research suggests greater awareness of gambling marketing is associated with more frequent and riskier gambling behaviour, especially among those experiencing gambling problems (Clemens et al., 2017; Newall et al., 2019; Wardle et al., 2022).

## A Vulnerable Population

Increased opportunities to legally gamble and increased gambling advertising occur at a moment in history when the population could be particularly vulnerable. Research indicates that the COVID-19 pandemic has had a significant impact on mental health of people living in Canada (Guerrero & Barnes, 2022; Canadian Centre on Substance Use and Addiction & Mental Health Commission of Canada, 2022). At the same time, people in Canada are experiencing financial strain because of increases in the cost of living. One key reason people gamble problematically is for relief from stress or other negative emotions (Blaszczynski & Nower, 2002; Buchanan et al., 2020; Shaw et al., 2022; Young & Wohl, 2009). Seeking such relief is also a significant reason people use substances problematically (Love et al., 1998; Tiffany & Drobos, 1991; Tiffany et al., 1993).

The combination of these factors could result in an increase in the number of people who turn to gambling for short-term relief from anxiety or depression, or even as a solution to financial difficulties (Olason et al., 2017). Early research investigating the impact of introducing single-event sports betting in Ontario found that live sports betting can be especially attractive to people who struggle with mental health challenges and those who experience harm from substance use (Vieira et al., 2022). Mental health concerns such as anxiety and depression were a risk factor associated with people who gambled online at high-risk levels during the pandemic (Price, 2022; Price et al., 2023).



# The Need for a Pan-Canadian Strategy to Address Gambling-Related Harm

Increases in opportunities to legally gamble and the increase in gambling advertising in Canada are likely to result in increasing harm to the general population and to youth, young adults and other vulnerable populations. Increased gambling-related harms will have impacts on health-care systems (treatment and prevention); criminal-justice systems (policing, prosecution, incarceration and probation for gambling-related crime); child-welfare systems (to respond to gambling-related family problems); and unemployment and welfare systems (due to gambling-related bankruptcy and loss of employment because of gambling); and will be associated with lost productivity costs because of gambling-related suicide (Williams et al., 2011). Following the example of the United Kingdom's *National Strategy to Reduce Gambling Harms* (Government of the United Kingdom, Gambling Commission, 2019) and Canadian strategies to address alcohol (National Alcohol Strategy Working Group, 2007), tobacco (Government of Canada, 2023) and opioids (National Advisory Council on Prescription Drug Misuse, 2013), Canada must develop a pan-Canadian strategy to address:

- The need for **national standards** governing the promotion and provision of gambling products;
- Problematic **conflicts of interest** among gambling stakeholders;
- Inadequate **funding for gambling harm prevention and reduction initiatives and research** across jurisdictions;
- The absence of any **systematic monitoring of changes in gambling-related harm**, including any assessments of the social and economic costs of gambling; and
- The need to **increase awareness of gambling-related harms** among health and social service professionals and the public.

## National Standards for Gambling

The Canadian *Criminal Code* specifies that the authority to conduct and manage gambling rests with the provinces and territories. There are no national or federal codes or regulations governing the availability and advertising of gambling products. Because the internet does not respect borders, online gambling apps and websites permitted in provinces and territories with more liberal regulations (those permitting privately owned gambling companies) are visible to residents of provinces and territories with more strict regulatory controls. In effect, this means that the power of jurisdictions that want to maintain or impose regulations to limit their citizens' exposure to gambling and gambling advertising is being eroded by jurisdictions that have liberalized their policies on gambling and adopted a more market-driven approach.

In most provinces and territories, Crown lottery corporations act as state monopolies that conduct and manage most legal gambling in their jurisdictions.<sup>2</sup> There are benefits to state monopolies controlling the promotion and distribution of legal products associated with hazardous consumption such as alcohol, cannabis and gambling. The World Health Organization's SAFER initiative recommends state monopolies control the sale and

<sup>2</sup> There are exceptions. In terms of legal gambling, First Nations organizations can also manage certain gambling venues or online gambling sites. Illegal gambling, both online and in-person, also still exists.



distribution of alcohol because monopolies can maintain more control of the commercialization of alcohol and can more effectively manage alcohol-related harm than markets that permit the sale and distribution of alcohol by private interests (World Health Organization, n.d.). These considerations hold for gambling state monopolies such as Canadian Crown lottery corporations. However, after Ontario became the first province to permit privately owned gambling corporations to operate, it is possible that other provinces and territories might follow this path.

## National Advertising Standards for Gambling

Unlike alcohol (Canadian Radio-television and Telecommunications Commission, 1996), tobacco (Government of Canada, 1997) and cannabis (Government of Canada, 2018), there are no Canadian national standards or regulations governing gambling advertising. At the federal level, the *Competition Act* is the primary legislation that governs advertising in Canada. The *Canadian Code of Advertising Standards* stipulates the criteria for acceptable advertising in Canada. However, it is not certain if these criteria could be used to regulate gambling advertising nationally.

In the 2021 report, *Responsible Sports Betting in Canada*, strong standards for advertising and marketing were a top concern for the public and for Canadian gambling operators. People were concerned that advertisements could be promoting unrealistic expectations about the role of skill in betting and about the chances of winning (Responsible Gambling Council, 2021b). People were also concerned about the exposure of minors to gambling advertising.

In the absence of national advertising standards, each province and territory has developed its own marketing and advertising standards for gambling (Alcohol and Gaming Commission of Ontario, n.d.; Alberta Gaming, Liquor and Cannabis, 2023; Government of British Columbia, Gaming Policy and Enforcement Branch, 2015; Loto-Québec, 2014; Saskatchewan Liquor and Gaming Authority, 2022). In British Columbia, for example, the Ministry of Public Safety and Solicitor General's Gaming Policy and Enforcement Branch establishes advertising and marketing standards for gambling in the province. In Ontario, the Alcohol and Gaming Commission of Ontario regulates the content and placement of gambling advertising. Stakeholders such as broadcasters and sports leagues may have their own voluntary approaches. However, advertisements spill across borders when sports coverage from one province is broadcast to others. Gambling products that might be legal in Ontario or Alberta might be part of the "grey market" (not legal) for people who see advertisements for those products in, for example, Saskatchewan. Solutions to this problem will not be easy, but it must be addressed.

A coordinated, national approach to advertising standards is more likely to be effective than regional, isolated or voluntary approaches. Borders and jurisdictions are meaningless for modern media platforms. Promotions are frequently ambiguous as to whether the brand advertised is legal in the jurisdiction where the advertising is consumed. People are often unaware of the differences between gambling companies that are licensed to operate in their region and those that are not. For advertising standards to be effective, they must be clear, consistent and enforceable. They must specify the volume and what content can be included in advertisements, as well as where and when they can be displayed. National advertising standards for gambling are needed to protect people living in Canada and bring gambling regulations in line with those governing the promotion of cannabis and alcohol.



## Protecting Youth and Young Adults

As noted in a previous section, many Canadian jurisdictions have regulations for gambling advertisements that are intended to protect those who are underage. Although these regulations stipulate that gambling advertising should not target young people, minors watch sports regularly and clearly they are exposed to gambling advertising while watching or when viewing content on social media that is supported by gambling advertising.

There are important reasons for national regulations aimed at reducing underage peoples' exposure to alcohol, tobacco and cannabis advertising. Youth and young adults often have less self-control and are more impulsive, making them vulnerable to marketing messaging and incentives (Pechmann et al., 2005). Youth and young adults can also find it difficult to distinguish between informational and promotional content (Sandberg et al., 2011).

Regular exposure to gambling advertising on television and digital media communicates to young people that gambling is a common, "normal" activity that is not necessarily associated with risk (Djohari et al., 2019; Office of Responsible Gambling, 2020). It is largely young men who are the target for the marketing of sports betting (Deans et al., 2016). The narratives in advertisements often show sports betting as a way for young men to display masculinity, knowledge of sports and team loyalty (Lopez-Gonzalez et al., 2018). In this way, advertising can use emotion to shape young men's attitudes so that they are more motivated to bet (Jones & Noel, 2021; Torrance et al., 2021).

Exposure to gambling advertising, even when not targeted at youth, introduces young people to gambling and can increase the likelihood that young people will begin to gamble (Clemens et al., 2017). Starting to gamble at a younger age is associated with an increased likelihood of experiencing gambling harm and developing gambling problems later in life (Gupta & Derevensky, 1998; Australia Government, Productivity Commission, 2010; Volberg et al., 2010). Although gambling advertising is currently ubiquitous, by acting quickly and developing national standards governing gambling advertising, we might be able to mitigate the impact such advertising is likely to have on Canadian youth and young adults.





## Advertising Standards for Gambling in Other Countries

In Canada we have an opportunity to learn from other countries. In countries that expanded their gambling markets before Canada, like Australia, Belgium and the Netherlands, the proliferation of gambling availability and advertising has caused great concern about the impact of online marketing of sports betting on youth, young adults and other vulnerable groups such as people experiencing problem gambling (Dunlop & Ballantyne, 2021; Killick & Griffiths, 2020; Government of the United Kingdom, Gambling Commission, 2020; Nyemcsok et al., 2022; Nyemcsok et al., 2021; Pitt et al., 2016; Pitt et al., 2022; Thomas et al., 2018).

Regulators in these and other countries have responded by taking precautionary measures to ban or severely limit advertising on a national level (see Table 1). In 2022, Belgium announced it would ban almost all forms of gambling advertising and in the same year the Dutch gambling regulator announced it would permit gambling companies to advertise online only if they could prove their advertisements do not reach those under the age of 24 (Moore, 2022; O'Hagan, 2022). In June 2023, an Australian parliamentary committee recommended the government implement a comprehensive ban on all forms of advertising for online gambling (Australian Government, Standing Committee on Social Policy and Legal Affairs, 2023). A significant upheaval in advertising regulations is also expected in the United States. (VIXIO GamblingCompliance, 2022).



**Table 1. Timeline of selected measures to reduce harm from sports betting advertising internationally**

2013	Australia bans live betting odds during television sports broadcasts
2018	Italy bans betting and gambling advertising on TV, the internet, social media platforms, in publications, on billboards, and at sports and cultural events
2018	Australia prohibits advertising during live sports on TV and streamed online between 5:00 a.m. and 8:30 p.m.
2018	United Kingdom sports betting industry voluntarily agree to a “whistle-to-whistle” ban on gambling advertising around live sports broadcasts
2019	United Kingdom advertising regulations stipulate that advertising should not “unduly pressure the audience to gamble” with phrases like “bet now”
2020	Spain bans gambling sports sponsorship deals
2021	France bans ads that trivialize gambling, and suggests industry set combined limit of no more than three advertisements for each advertising slot and no more than three advertisements per site each day
2022	Spain prohibits advertising except for between 1 a.m. and 5 a.m., and bans sign-up bonuses, which made permanent those measures that were put in place during the COVID-19 lockdown
2022	Belgium announces it will ban almost all forms of gambling advertising
2022	The Netherlands allows gambling companies to advertise online only if they prove that their ads do not reach those under the age of 24
2022	United Kingdom advertisements must not feature sports or television celebrities with large followings on social media of those under 18
2022	Norway’s state-owned gambling operator Norsk Tipping stops all sports betting advertising on television
2022	Ireland prohibits inducements and gambling advertising between 5:30 a.m. and 9:00 p.m., and bans all gambling advertising on social media

## Conflicts of Interest

In addition to the need for national standards governing the availability and promotion of gambling, a pan-Canadian strategy is necessary to navigate the many potentially problematic conflicts of interest involved. The most obvious is the gambling industry itself. The gambling industry is wealthy and powerful. It has a large interest in gambling-related regulatory and policy changes, and an interest in how harm prevention and minimization strategies are conducted — favouring those that place the responsibility for gambling-related harm on the individual rather than the gambling company or product they are selling. It tends to support initiatives or interventions that serve its interests and discourages or actively lobbies against those that do not (Cowlshaw & Thomas, 2018).



There are also many other stakeholders with a financial interest involved in gambling. The most obvious are the sports industry and associated media companies that generate significant revenue from gambling advertising. However, there are also many others profiting from links with the gambling industry (e.g., affiliates, technology companies specializing in odds). In addition to private interests, provincial and territorial governments also generate significant revenue through taxing gambling and from a portion of the profits derived from conducting and managing gambling in the province. These revenues go to finance ministries and support government programs. However, there are no estimates of the health and social costs of gambling as we have for hazardous products such as alcohol, tobacco and cannabis (Canadian Substance Use Costs and Harms Scientific Working Group, 2020, 2023; Sorge et al., 2020; Young & Jesseman, 2014).

While many stakeholders in the gambling industry reap short-term financial benefits from gambling, less powerful stakeholders are concerned about the health impacts and social costs associated with gambling. For this reason, it is important to bring together federal, provincial and territorial organizations to develop a pan-Canadian strategy to guide regulatory, health promotion, prevention, treatment and enforcement efforts to address gambling. The development of this strategy should be led by an organization that does not have any vested financial interest in the content or potential outcomes of the strategy. The Canadian Centre on Substance Use and Addiction is a non-governmental organization that was established by an Act of Parliament in 1988 to provide national leadership on substance use and to advance solutions to address alcohol- and drug-related harms. Its leadership in developing and implementing Canadian strategies to address alcohol use (National Alcohol Strategy Working Group, 2007) and the opioid crisis (National Advisory Council on Prescription Drug Misuse, 2013), its role in developing the world's first lower-risk gambling guidelines (Young et al., 2021), and its independence from any real or perceived conflicts of interest make it an ideal organization to lead the strategy's development.

## Funding

Although some public health units and other non-profit organizations in Canada engage in gambling harm prevention and reduction, this responsibility has largely been left to the gambling operators through Crown lottery corporations that conduct and manage gambling in the provinces and territories or to the private operators licensed to offer online gambling and sports betting in Ontario through partnerships with amenable for-profit and not-for-profit organizations. Funding for gambling harm prevention and reduction by public health, non-profit and other organizations has been largely neglected as a multitude of social issues compete for limited public health funds. Further, although the social responsibility divisions of many Crown lottery corporations do what they can with the funds at their disposal, their resources are smaller compared to the corporations' marketing budgets and much smaller than the advertising budgets of large multi-national gambling corporations such as BetMGM and Flutter.

In addition to funding shortfalls for gambling harm prevention and reduction programming, funding is lacking for research on gambling-related harms. More knowledge is vital to understand the association between the rise in gambling advertising and availability and gambling harm; who is most at risk when engaging in sports betting; and the effectiveness of educational strategies and campaigns aimed at reducing harm from sports betting, especially for youth and young adults.

Apart from funding from the gambling industry itself, there are currently few sources of gambling research funding in Canada. Although the Canadian Institutes of Health Research recently issued a funding



opportunity for gambling research, the first of its kind,<sup>3</sup> funding for such research is not generally part of the mandate of the national research funding bodies, and it is not funded by Health Canada's Substance Use and Addiction Program. Some gambling researchers have sought alternative sources of funding, including funds from the gambling industry. This practice has led to allegations of real or perceived conflicts of interest among researchers who conduct studies using funds from sources that have an interest in the outcome of that research (Cassidy, 2014; Cowlshaw & Thomas, 2018; Kim et al., 2016). Young and colleagues have registered with the Open Science Framework (OSF) a protocol for research to identify and quantify the risk of funding-related bias in gambling research (2023). Even though most provinces and territories dedicate a percentage of gambling revenue to social responsibility initiatives, ranging from 0.45 to 2.00 per cent, there is a great deal of variability in how much of these funds are allocated to research and how they are distributed. The amount currently available to fund gambling-related research is inadequate.

One option to fund gambling research is to levy provincial revenue generated by gambling then use the proceeds to fund research and initiatives aimed at reducing gambling-related harms. In April 2023, the government of the United Kingdom outlined its vision for the future of gambling in a much-anticipated white paper (Government of the United Kingdom, Department for Culture, Media and Sport, 2023). The white paper describes how the government will introduce a statutory levy paid by operators that will be used to fund projects and services aimed at addressing gambling-related harm. Such an approach has a precedent in Canada. Between 2000 and 2012, two per cent of slot machine revenue from most casinos in Ontario was dedicated to funding research, prevention and treatment of problem gambling. A portion of this funding was distributed by the Ontario Problem Gambling Research Centre.<sup>4</sup> However, in 2012 the Ontario government revised its approach and redirected these funds back into general provincial revenue.

## Monitoring and Surveillance of Gambling-Related Harm

Without national and provincial monitoring and surveillance of gambling-related harm, it is impossible to assess the impact of recent policy changes or whether any harm mitigation efforts implemented have any effect. The last national survey that assessed gambling participation and problem gambling in Canada was conducted in 2018 (Rotermann & Gilmour, 2022).

In addition to the need for a more recent national problem-gambling prevalence survey, there is also a need for a more comprehensive monitoring and surveillance system to assess and report on gambling-related harm. Just as alcohol use disorder is not the only harm associated with alcohol consumption, it is becoming increasingly recognized that “problem” or “disordered” gambling is not the only harm associated with gambling (Langham et al., 2016). The lower-risk gambling guidelines developed by the Canadian Centre on Substance Use and Addiction in 2020 (Young et al., 2021; Young et al., 2022) were designed to reduce

3 This was a relatively small, one-year research fund called the Catalyst Grant (Health Impacts of Gambling and Gaming: <https://www.researchnet-recherchenet.ca/rnr16/vwOpprtntyDtIs.do?prog=3960&view=search&terms=gambling>). There has been no indication whether there may be any further funding to study gambling and gambling-related harm.

4 In 2012, the Ontario Problem Gambling Research Centre became Gambling Research Exchange Ontario (Greo) and its mandate shifted to knowledge mobilization. In 2019, the Ontario government cut all funding to Greo, which became Greo Evidence Insights ([www.greo.ca](http://www.greo.ca)), an independent, not-for-profit research, knowledge translation and exchange organization working in the health and wellbeing sectors, with expertise in gambling.



the risk of gambling-related financial, relationship, emotional–psychological and health harms. However, at present, epidemiological indicators sensitive to gambling-related harms — gambling-related bankruptcy, gambling-related divorce, gambling-involved suicide, problem gambling treatment demand — are not being systematically collected and analyzed. Therefore, if gambling harms begins to increase, as expected, these harms will remain largely undetected.

## Other Important Issues

In addition to national standards, problematic conflicts of interest, inadequate funding and the absence of systematic monitoring of changes in gambling-related harm, there are other issues that a pan-Canadian strategy on gambling-related harm in Canada could address:

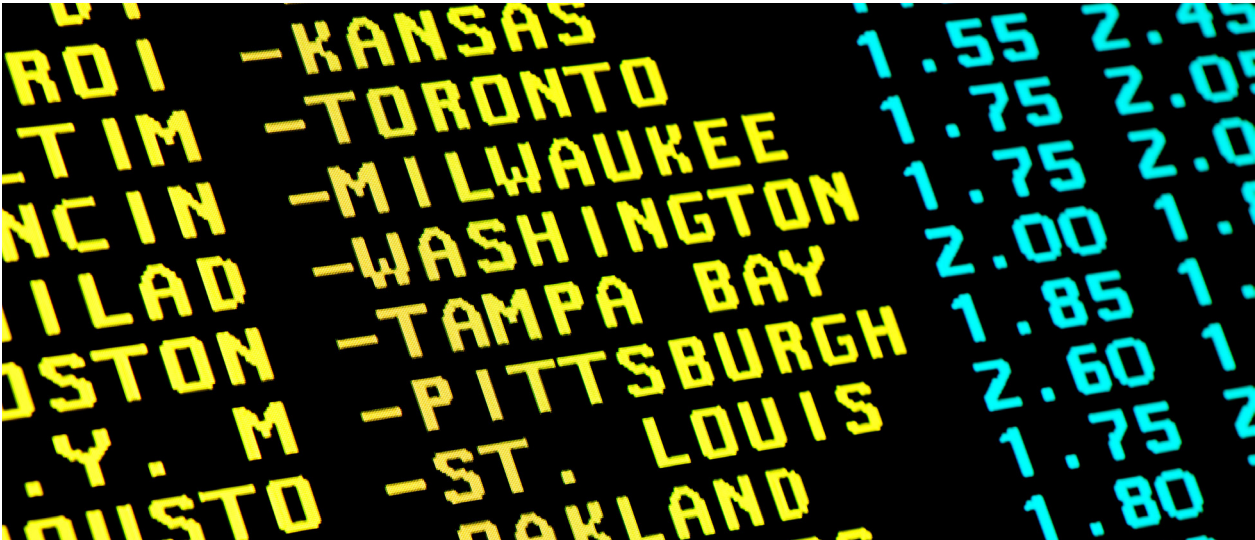
- Increase awareness of gambling-related harms among health and social service professionals and the public;
- Investigate how to regulate and reduce harms associated with e-sports betting and gambling in videogaming (e.g., loot boxes) as these are emerging areas with important public health implications, especially among youth and young adults (Biggar et al. 2023; Spicer et al., 2021);
- Determine how to effectively prohibit companies who are not licensed in a province or territory from competing with Crown lottery corporations in that jurisdiction (e.g., payment blocking by financial institutions, more effective enforcement, etc.);
- Establish common, fair, balanced, transparent and informative messaging that all those engaged in gambling harm prevention and reduction can use, so that a cohesive, coherent message is delivered to people who gamble;
- Investigate the efficacy of safer gambling measures (e.g., loss limits, monthly account summaries with personal and normative comparisons, credit card bans, etc.), including measures designed specifically for people who bet on sports, and determine which measures should be made mandatory through regulation;
- Assess the feasibility and usefulness of a national self-exclusion registry that allows people to block themselves from accessing gambling sites licensed anywhere in Canada;
- Explore ways to initiate more school- and community-based education about the distinction between skill in sports as opposed to gambling (e.g., through partnerships with school boards, sporting associations, youth organizations, cultural groups, etc.);
- Support efforts by non-profit organizations, operators and treatment providers to destigmatize the use of safer gambling tools, resources and help services for those needing assistance; and
- Establish vehicles to fund research to address knowledge gaps, for example, the absence of an understanding of the social and economic costs of gambling and how these compare to provincial and territorial revenue from gambling.



# Discussion

The gambling industry, the sports industry, media and provincial and territorial governments have benefited financially from the federal, provincial and territorial gambling policy changes described in this report. The benefits are especially clear in Ontario, where the market was opened to permit large, privately owned, international gambling corporations to offer online gambling. Well-funded interests could be expected to be pressuring other provincial and territorial governments to follow Ontario's lead and liberalize their gambling markets. This option can be appealing to governments, particularly because other ways of generating government revenue such as taxation are unpopular. In contrast, there are an unknown number of people who have been or will be harmed from gambling. There are no estimates of the social and economic burden gambling will have on our communities in the months and years to come although evidence suggests it could be considerable.

Canada is at a critical moment in how it manages gambling and gambling-related harm. Canada can learn from the experience of countries such as Australia and the United Kingdom that have had more time to assess the impact of the proliferation of gambling advertising and availability on their populations. In advance of a possible further expansion of the gambling market in Canada, federal, provincial and territorial governments and organizations must come together to develop a pan-Canadian strategy to guide regulatory, health promotion, prevention, treatment, research and enforcement efforts to address gambling harm. A comprehensive and collaborative strategy will provide coordinated direction and recommendations to prevent and minimize the harms and social and economic burdens associated with gambling.



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