

# *Bill S-211: An Act respecting a national framework on sports betting advertising*

December 2025



CANADIAN  
GAMING  
ASSOCIATION

# 40+ Years of Regulated Gaming Advertising:

- Gaming advertising has been present in Canada for over four decades and is highly regulated, with multiple organizations enforcing policies and regulations specific to advertising content.
- Provincial governments have had oversight of gaming regulation for the past 40 year through bodies like the Alcohol and Gaming Commission of Ontario (AGCO), Alberta Gaming, Liquor and Cannabis Commission (AGLC) and other provincial Crown corporations.
- They have been recognized for their expertise in creating world-leading regulatory and consumer protection measures for gambling and have a proven ability to address issues quickly without federal intervention.



# Unnecessary Duplication:

- Bill S-211 imposes a national framework that is unnecessary, creates duplication and will undermine provincial rights and actions.
- Gaming advertising in Canada is already subject to several layers of oversight.
- Provincial gaming regulators set regulatory standards for all operators to meet.
- TV advertising is subject to review against thinkTV's code prior to being permitted to air.
- Ad Standards Canada's *Canadian Code of Advertising Standards* also applies to all advertisers in Canada.
- Individual professional sports leagues and broadcast partners have their own policies.
- Together these create a very robust mechanism for advertising oversight and compliance in Canada, driven by provincial and territorial oversight.



# Provinces Control the Tools:

- In 1985 the Federal Government signed over management and oversight of gaming activity in Canada to the Provinces. This has created a world-leading commitment to responsible gambling through player education programs, prevention, and protection measures.
- The commitment to building a strong culture of responsible gaming is at the cornerstone of each province's approach to its gaming framework.
- In addition, each province has the tools to control gaming advertising, including ad content, images, rules on offers, locations of billboard advertising, etc.
- Provincial regulators have all the controls to restrict or even ban gambling advertising within their jurisdictions.



# 1985 Agreement: The Rights of the Provinces Are Not Reduced or Restricted

WITNESSETH THAT, in consideration of the mutual covenants herein set forth, the parties hereto agree as follows:

1. The Government of Canada undertakes
  - 1.1 to refrain from re-entering the field of gaming and betting (except to the extent of its present role under section 188 of the Criminal Code with respect to horse races) and to ensure that the rights of the Provinces in that field are not reduced or restricted;



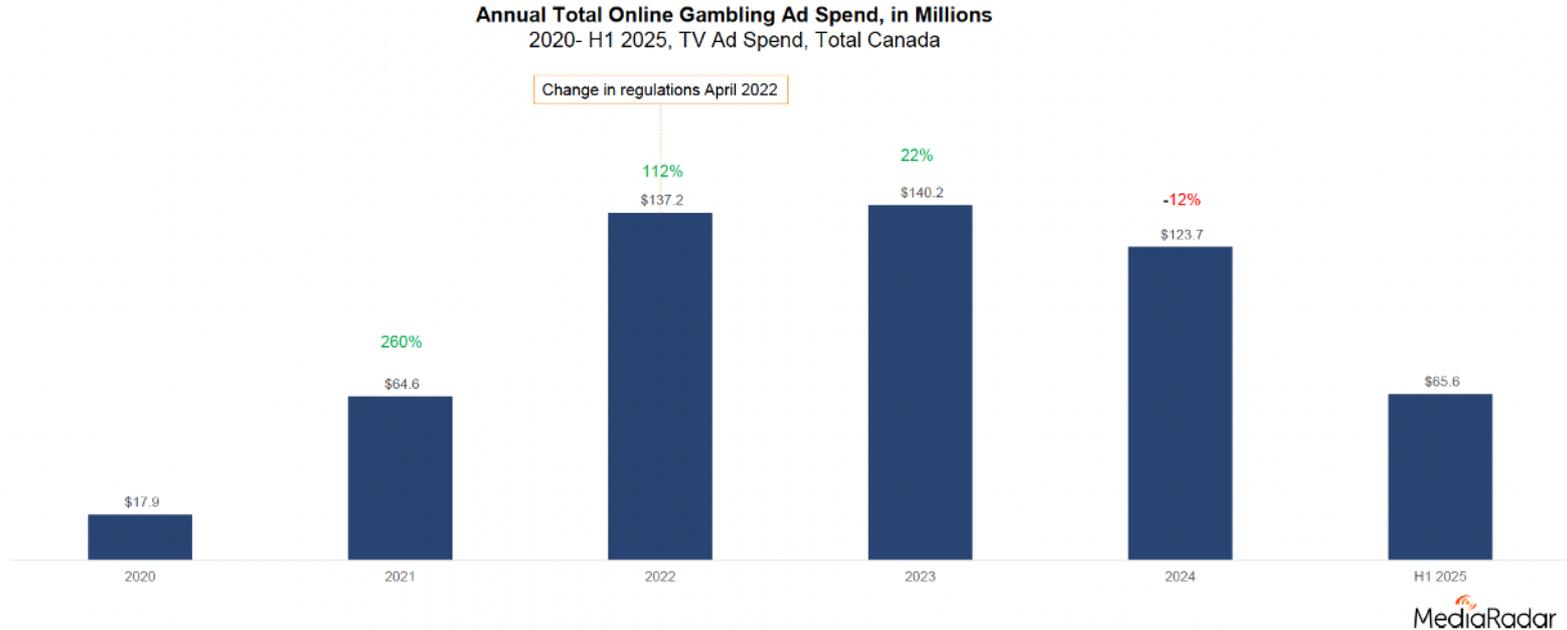
# Discussions Based on Facts & Data:

- While the discourse surrounding gambling advertising in Canada has often been driven by emotion, the CGA maintains that a comprehensive discussion on gaming advertising is valuable, provided it is grounded in facts and data.
- Gaming advertising represented only 2% of all ads on television for the first half of 2025 (same as 2024).
- Total media spending on gaming advertising remains below peak levels, accounting for just 2% of overall media spend in 2024 and H1 2025. Only 4% of NHL Hockey games occurrences were for gaming ads which is the same as in 2024 and a 2% decrease from 2023.
- Media Radar also compiled a list of the top 10 advertisers during the 2025 NHL Playoffs and **no gaming operators** appear on the list.



# TV ADVERTISING SPEND FOR ONLINE GAMBLING PEAKED IN 2023

Following a change in regulations in April 2022, the Online Gambling category saw a significant increase in TV Ad Spend



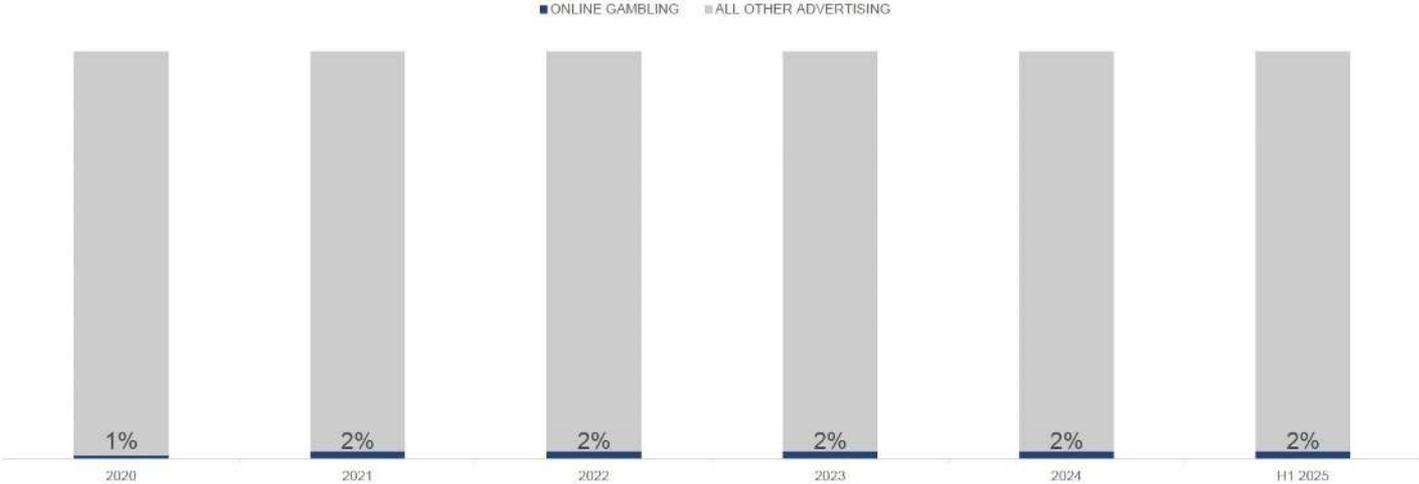
Source: MediaRadar Advertising Expenditures, Online Gambling: Casinos; Sports Betting & Odds Information Class, Total Media, Total Canada, 2020- H1 2025



# ONLINE GAMBLING ONLY MADE UP 2% OF ALL TV AD OCCURRENCES OVER THE PAST 5 YEARS

Relative to all other advertising, Online Gambling has not had a significant increase in overall proportion of TV ad activity.

Annual Total Online Gambling TV Occurrences, by Year  
2020-2025, Total Canada



Source: MediaRadar TV Occurrences, Online Gambling: Casinos; Sports Betting & Odds Information Class vs. All Remaining Ad Occurrences, Total Canada, 2020 - H1 2025

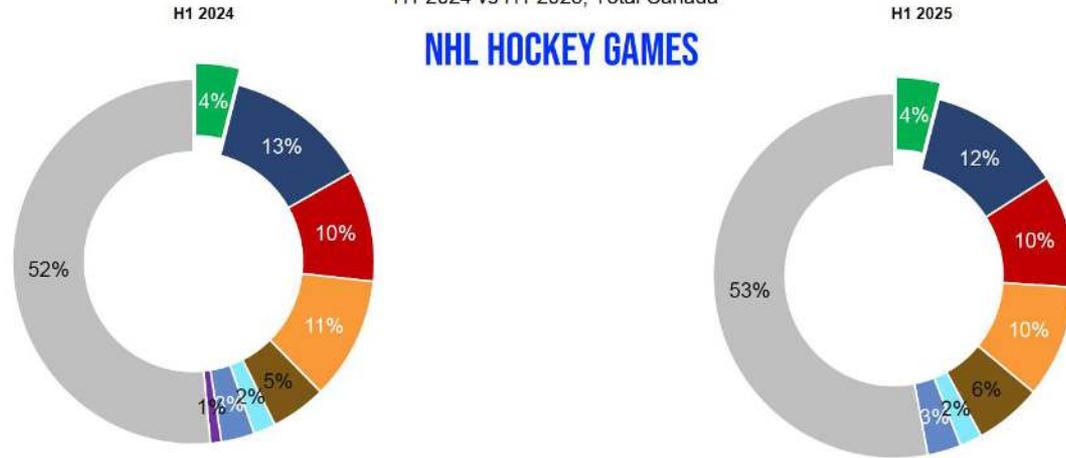


# ONLINE GAMBLING TV OCCURRENCES DURING NHL HOCKEY REMAINS AT 4% SO FAR IN 2025

Lotteries category represented <1% in 2025

Share of Ad Occurrences, by Program Type, Key Categories  
H1 2024 vs H1 2025, Total Canada

## NHL HOCKEY GAMES



■ ONLINE GAMBLING 
 ■ AUTOMOTIVE 
 ■ FAST FOOD RESTAURANTS 
 ■ FINANCIAL & INSURANCE SERVICES 
 ■ PHARMA 
 ■ SNACK FOOD + SOFT DRINKS 
 ■ ALCOHOL & RELATED BEVERAGES 
 ■ LOTTERIES 
 ■ OTHER

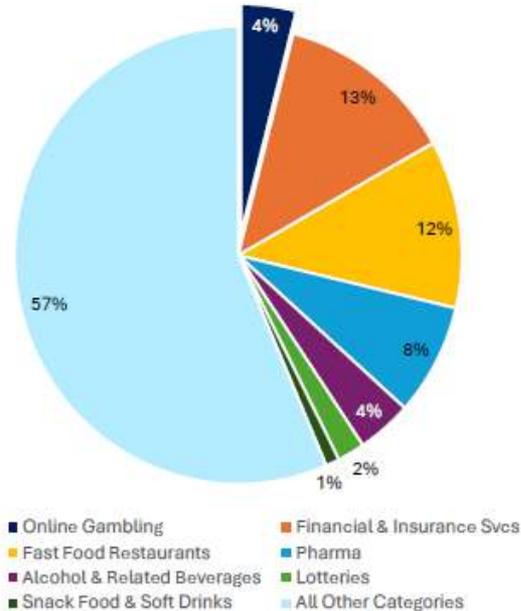
MediaRadar

Source: MediaRadar TV Occurrences, Select Categories, Total Canada, NHL Games, H1 2024, H1 2025



# Number of TV Occurrences by Category for MLB Playoffs: ALCS, NLCS and World Series

Online Gambling accounted for 4% of the total TV spot occurrences during the last 2 rounds of the MLB Playoffs



## Games Included

**ALCS**  
Blue Jays vs Mariners  
Game 1 – Oct 12  
Game 2 – Oct 13  
Game 3 – Oct 15  
Game 4 – Oct 16  
Game 5 – Oct 17  
Game 6 – Oct 19  
Game 7 – Oct 20

**NLCS**  
Dodgers vs Brewers  
Game 1 – Oct 13  
Game 2 – Oct 14  
Game 3 – Oct 16  
Game 4 – Oct 17

**World Series**  
Blue Jays vs Dodgers  
Game 1 – Oct 24  
Game 2 – Oct 25  
Game 3 – Oct 27  
Game 4 – Oct 28  
Game 5 – Oct 29  
Game 6 – Oct 31  
Game 7 – Nov 1

Online Gambling ads accounted for 2% of the total TV occurrences during Game 7 of the World Series

MediaRadar



# Professional Sports Leagues Have Policies:

- Professional sports leagues have their *own respective codes of practice* for sports betting advertising which guide how gaming advertising will interact with their product and broadcasts.
- This includes the NFL, the NBA, the NHL, the MLB, and the CFL.
- For the 2023-24 season, the NHL, working with its Canadian broadcast partner, had *a cap of 15% for sports betting advertising in a hockey broadcast* – which applied both to traditional commercials and digital signage in broadcast.



# Kids Aren't Watching Television:

- At a panel discussion on the topic of gaming advertising at the Canadian Gaming Summit in June 2025, thinkTV CEO Catherine MacLeod said the quantity of gaming advertising has gone down every year since Ontario's market launch in 2022.
- *"It's not, in my view, a problem with too much advertising," she said, "If you want to reach kids, the last place you want to be is on television. This idea that every kid is watching television is just so antiquated."*



# Under 18s TV Viewership Down 50%:

According to Numeris, who provides audience measurement data for the media industry:

- Kids make up a small percentage of the hockey audience across Canada – children aged 2-17 make up 17.3% of the total population but only 10% of the hockey viewing audience in 2024-2025.
- Hockey viewership for kids under 18s has dropped by 45% from 2020 to 2024-2025.
- Broadcast TV viewership for under 18s has dropped by 50% over the past 4 years.
- During the 2024-2025 season, the only hockey games to rank in the top 20 were the World Junior Games, both of which indexed well below the youth population at 10.5% and 8.6%, respectively.
- Remarkably, **CBC's Election Night – Canada Votes** achieved a higher youth index than either hockey game, with 12.4% compared to 17.3% of the population.



# Summary:

- Bill S-211 undermines the 1985 agreement by asking the federal government to re-enter the field of gaming and will frustrate and duplicate provincial efforts.
- Gaming advertising in Canada is currently subject to robust regulation, policies, and oversight.
- The discourse surrounding gambling advertising in Canada has often been driven by emotion, and the CGA maintains that a comprehensive discussion on gaming advertising is valuable, provided it is grounded in facts and data.

