



CANADIAN GAMING ASSOCIATION

September 29, 2025

Introduction

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.

Bill S-211 is unnecessary as what it aims to do is already being undertaken by Provincial governments, their agencies, gaming industry stakeholders, and a network of academic research organizations.

Provincial governments have had oversight of gaming regulation for the past 40 years through bodies like the Alcohol and Gaming Commission of Ontario (AGCO), Alberta Gaming, Liquor and Cannabis Commission (AGLC) and other 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.

Provinces are responsible for regulating sports betting and gaming advertising. Ontario and soon Alberta have been enhancing their own regulated gaming frameworks to provide a higher level of consumer protection. Bill S-211 imposes a national framework that is unnecessary, creates duplication and will only serve to undermine provincial actions.

Provincial regulators understand the industry and manage gaming advertising within the broader context of integrity and responsibility—an approach a national framework may lack. Since the major gaming advertisers are provincial Crown lottery and gaming corporations, provincial oversight remains essential.

Gambling Advertising is Fully Regulated

Gaming advertising in Canada is currently subject to several layers of oversight. Gaming regulators, such as Ontario's AGCO, set regulatory standards for gaming operators to meet. In addition, all 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. Together these create a very robust mechanism for advertising oversight and compliance in Canada, driven by provincial and territorial oversight.

Additionally, professional sports leagues have developed their own codes of practice for sports betting advertising, outlining how gaming advertising will interact with their product and broadcasts.

Gaming Advertising Data

Given the emotional debate surrounding licensed gaming operators and advertising, the CGA commissioned a study of online gambling and sports betting trends across Canada from Media Radar/Vivvix in 2023, 2024 and the first six months of 2025. Highlights from these studies include:



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- Gaming advertising represented only 2% of all ads on television the first half of 2025 (same as 2024).
- Total media spend 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 companies** appear on the list.

Regulations on Gaming Advertising are Part of a Comprehensive Consumer Protection Regime

Ontario is the first province in Canada to implement a fully regulated marketplace for online gaming and sports wagering, establishing the highest levels of consumer protection nationwide. Within the initial two years of regulation, nearly 90% of online gambling transitioned from unregulated platforms—previously lacking consumer protection requirements—into the regulated framework.

The industry is committed to robust consumer protection practices, particularly concerning youth and vulnerable groups, and has demonstrated compliance with advertising standards. Notably, there have been no reported violations reported within the first 3 years of operation.

In Ontario, protections include restrictions on mass market advertising of bonuses or incentives and mandatory training for staff who interact with customers, aimed at identifying and appropriately responding to players exhibiting signs of problem gambling, as well as assisting those experiencing harm. Operators must also provide 24-hour live customer support.

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 factual information and data.

It is recognized that the inaugural year of hockey playoffs generated concerns among certain members of the public and stakeholders, as reflected in Canadian media coverage. The ongoing negative response to legal and regulated iGaming advertising is predominantly emotional and may have stemmed from limited understanding of the benefits and requirements of a regulated market.

Kids Aren't Watching Television

At a panel discussion on the topic of gaming advertising at the Canadian Gaming Summit in June, 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."*



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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 2024/25 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.

For more information, please contact:

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