

Remarks to the Senate Transportation & Communications Standing Committee

Study of Bill S-269

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Good morning and thank you for the opportunity to appear before you today.

The Canadian Gaming Association is a national trade association representing 77 member companies who are the leading private sector operators and suppliers in Canada's casino gaming and sports betting, industries.

Gambling is a legal, regulated and socially acceptable entertainment choice for Canadians. Canada's regulated gaming industry in 2023 generated \$20 billion in revenue and directly employs over 100,000 Canadians in communities across the country.

I am here today to say that I don't believe Bill S269 is necessary, as most all of what the Bill aims to do is currently in place.

Provincial management and oversight of gaming activity in Canada has created a world-leading commitment to responsible gambling – comprehensive player education programs along with prevention and protection measures and research funding are renowned across the world. For example, Player Education programs such as GameSense, created by the British Columbia Lottery Corporation, is used in several provinces, as well as the states of Oregon and Massachusetts, and by MGM Resorts in North America. The commitment to building a strong culture of responsible gaming is at the cornerstone of each province's approach to its gaming framework.

We have a very effective regime of advertising compliance thanks to ThinkTV and Ad Standards Canada, who for decades have provided preclearance services to advertisers.

Underpinning it all are provincial gaming regulators who set and enforce the regulatory standards of their provinces.

When Ontario became the first province fully to licence and regulate iGaming, which includes sports betting, professional sports leagues and their broadcast partners became active stakeholders, developing policies on how sports wagering could interact with their product. Each league placed restrictions and limits on advertising for players, teams and officials, in venue, and on broadcasts.

There has been a lot of emotional discussion about gaming advertising over the past two years. There has also been a glaring absence of facts, data, and an understanding of the evolution of the Canadian gaming marketplace related to online gaming and why the actions

Ontario took to create a regulated marketplace were needed, welcomed, and should be applauded.

Since the late 1990's Canadians have had unrestricted access to unregulated offshore online casino gaming and sports betting. During that time, Canadians have been able to play casino games and bet on sports online using common payment tools like Interac or credit cards. Many of these offshore sites advertised on Canadian TV and on the rink boards and fields of Canadian professional sports teams using what is known as .net or play-for-free advertising.

Ontario's regulatory regime for online gaming has some of the most robust regulatory standards in North America, if not the world.

There are more than 20 measures related to gambling advertising, including the overarching regulation that **advertising, marketing materials and communications shall not target high-risk, underage or self-excluded persons. Here are a few pertinent examples:**

- Prevent minors from accessing online accounts – with account sign up rules that are rooted in Canada's anti-money laundering legislation for setting up gaming accounts. Verifying age, identity & location.
- Players must Opt-in to receive promotional offers
- Prohibition on mass market advertising of bonuses and incentives - something that is still permitted in the UK.
- Prominently promote and make available tools to support responsible play – i.e. setting time, wager, and loss limits and a range of time-out settings (from hours to months) as well as the ability to self-exclude.
- Creation of the soon to be launch centralize self-exclusion program.

After the first year of the market, the Alcohol and Gaming Commission of Ontario responded to public concern and reviewed their advertising standards and made additional amendments to restrict the use of athletes and tighten the definition on the appeal to minors.

The Ontario regulatory model brought over 85% of unregulated play into a regulated regime in less than two years, something not replicated anywhere in the world and represents an effective framework of oversight and protection for all gaming advertising.

Provinces have the tools and are in the best position to regulate. An additional layer of federal regulations is not required.

In closing, I want to share some data on online gaming advertising – this includes both casino & sports advertising in Canada – prepared by Media Radar/Vivvix and commissioned by the CGA:

- Compared to all other activity in Canada, Online Gambling has only represented 2% of all TV Ad Occurrences in 2022 and 2023.
- When compared to other key categories, Online Gambling represents an 8% share of Total Media Ad Spend
- Only 6% of NHL Hockey Game occurrences were for Online Gambling ads and 4% for NBA Basketball Game occurrences.
- There is an overall 15% decrease in TV ad spend during the last third of the year, comparing 2023 vs 2022, during peak sports programming.

Thank you.