



## Submission to the Alcohol and Gaming Commission of Ontario:

### Restricting athlete and celebrity participation in advertising for internet gaming

May 9, 2023

The Centre for Addiction and Mental Health (CAMH) is pleased to submit a response to this consultation by the Alcohol and Gaming Commission of Ontario (AGCO). We support the proposed amendments to the Registrar's Standards for Internet Gaming, which would restrict athlete and celebrity participation in gambling advertising. We also wish to make recommendations about gambling advertising more broadly.

In general, the purpose of advertising is to drive consumption, and gambling is no exception. A recent review of the scientific literature found that there is a causal relationship between people's exposure to gambling advertising and their intentions to gamble as well as increased gambling activity.<sup>1</sup> Children and youth, as well as those already experiencing gambling problems, are especially susceptible to these effects. This is significant because the more a person gambles – measured by frequency, duration, and/or expenditure – the higher their likelihood of experiencing harm.<sup>2</sup>

Ontario's regulations governing the content of gambling ads, including sports betting, are much more permissive than those found in some other jurisdictions. Amending the Registrar's Standards for Internet Gaming to restrict celebrity endorsements, including athletes and social media personalities, would be a positive and welcome step. The proposed amendments would be similar to those in the United Kingdom. However, regulations there go much further. The UK has a 'whistle-to-whistle' gambling advertising ban: during a sports broadcast, gambling ads cannot be shown from five minutes before a match begins until five minutes after it ends. More recently, regulators have acknowledged that other forms of gambling promotion, like gambling company logos on jerseys, should be covered by the whistle-to-whistle ban. Many Canadian media entities have established partnerships with sports betting companies, leading to gambling content being embedded in sports broadcasts and apps. In addition to the proposed restrictions on celebrity endorsements and athlete endorsements, **the province should enact a whistle-to-whistle ban that covers all gambling content during sporting event broadcasts.** A further change for AGCO to consider would be allowing gambling advertising only in media and venues (including digital / online) directed primarily to adults. This could include restrictions on the time of day during which gambling advertisements can occur in order to reduce the exposure of children and youth.

While it is important for people who gamble to be aware of the existence of legal alternatives to grey-market or illicit gambling, the ads appearing in Ontario since April 2022 seem designed in part to reach non-gamblers and encourage them to gamble – often through messaging or sponsorships that would be forbidden in other jurisdictions or for other substances / activities known to carry risk. We recommend that AGCO consider the Canadian Radio-television and Telecommunications Commission's *Code for Broadcast Advertising of Alcoholic Beverages* (CRTC Code),<sup>3</sup> which contains several provisions relevant to

gambling. **The following four provisions in particular should be adapted and applied to gambling advertising:**

Commercial messages shall not:

- attempt to influence non-drinkers of any age to drink or to purchase alcoholic beverages
- imply directly or indirectly that social acceptance, social status, personal success, or business or athletic achievement may be acquired, enhanced or reinforced through consumption of the product;
- imply directly or indirectly that the presence or consumption of alcohol is, in any way, essential to the enjoyment of an activity or an event
- refer to the feeling and effect caused by alcohol consumption

Between 2000 and 2019, more than half of callers to the Ontario Problem Gambling Helpline were experiencing problems with electronic gambling machines (EGMs). However, this proportion has been declining every year since 2015, while calls about problems with online gambling have increased sharply. In 2022, the same year Ontario introduced iGaming, online gambling displaced EGMs as the top reason people called the Ontario Problem Gambling Helpline.<sup>4</sup> Figure 1 illustrates this change in helpline calls from June 2021 to January 2023.<sup>5</sup> This is not to suggest causality, but to point out that many Ontarians are already experiencing harm due to online gambling / internet gaming. Under current advertising rules, this is likely to continue.

AGCO's draft regulations are welcome and CAMH supports them. But we encourage the province to enact a whistle-to-whistle advertising ban that covers all gambling content and to adapt the abovementioned portions of the CRTC Code for gambling ads. We also recommend that AGCO consider whether the Registrar's Standards should be amended to allow gambling advertising only in media and venues, including on websites, and in digital or online media, directed primarily to adults. And finally, we also urge AGCO to ensure that existing and future regulations around gambling advertising are enforced.

We would be pleased to meet to discuss these recommendations in more detail.

For more information, please contact:

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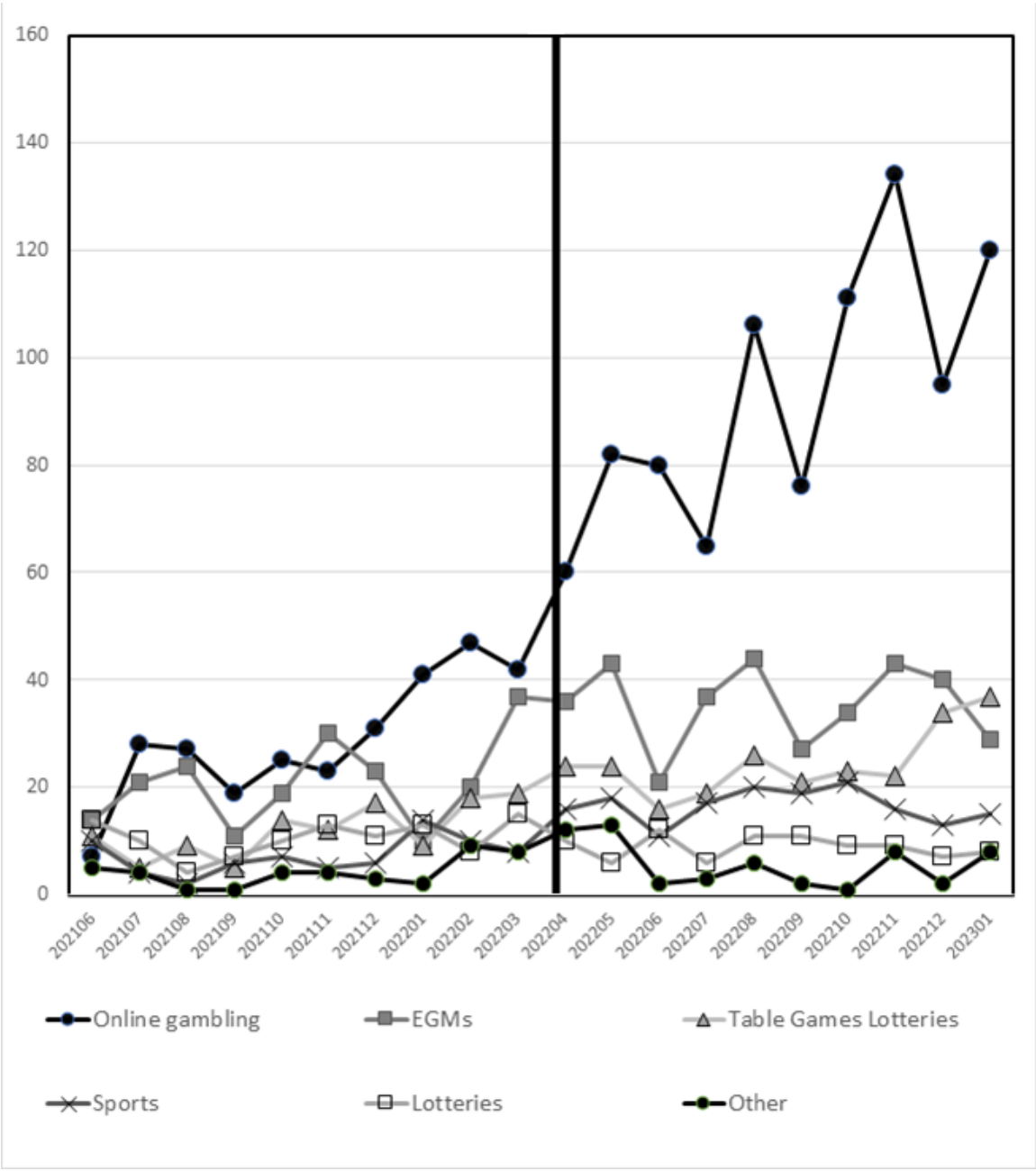
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The Centre for Addiction and Mental Health (CAMH) is Canada's largest mental health and addiction teaching hospital and one of the world's leading research centres in this field. CAMH is committed to playing a leading role in transforming society's understanding of mental illness and substance use and building a better health care system. To help achieve these goals, CAMH communicates evidence-informed policy advice to stakeholders and policymakers.

Figure 1: Number of calls to the Ontario Problem Gambling Helpline per game type from June 2021 to January 2023. The solid vertical bar denotes the introduction of iGaming.



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<sup>1</sup> McGrane, E., Wardle, H., Clowes, M., Blank, L., Pryce, R., Field, M., Sharpe, C., & Goyder, E. (2023). What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature. *Public Health, 215*, 124–130.

<sup>2</sup> Currie, S. R., & Low Risk Gambling Guidelines Scientific Working Group. (2019). A research plan to define Canada’s first low-risk gambling guidelines. *Health Promotion International, 34*(6), 1207–1217.

<sup>3</sup> Canadian Radio-television and Telecommunications Commission. (1996). Code for broadcast advertising of alcoholic beverages. Retrieved from <https://crtc.gc.ca/eng/television/publicit/codesalco.htm>

<sup>4</sup> ConnexOntario. (2023). Gambling activities identified by Individuals seeking problem gambling treatment services through ConnexOntario. K. Cobb (personal communication), March 6, 2023.

<sup>5</sup> Turner, N. E., Sinclair, L., Matheson, F. I. (2023). The rise of online betting in Ontario. Paper currently under review for publication.