

**White Paper
on
The Impact of Advertising for Gambling**

**by
The Campaign to Ban Ads for Gambling
BanAdsForGambling.ca**

August 5, 2023

Executive summary

In 2021, Parliament legalized sports betting in Canada, and enabled provinces and territories to ‘control and manage’ gambling on sports. Ontario established the first such regime on April 4, 2022, and registered 40 betting companies. Since then, there has been an explosion of advertising for gambling—on television, radio and social media, in venues and on players’ uniforms—and a tremendous growth of sports betting. In its first year of operation, iGaming in Ontario reported 1.6 million active bettors.

Gambling can lead to significant harm, including runaway debt, stress to families, low self-esteem, anxiety, depression, and even suicide. Statistics Canada has estimated that 1.6 % of adult gamblers are at moderate to high risk of gambling disorders—more than 300,000 Canadians. Problem gambling is a mental health issue, and has been defined as an addictive disorder.

Underage gambling is common in Canada, too, and is increasing with the spread of advertising for gambling. Ads make people much more susceptible to gamble, particularly since betting can be done so easily and quickly online. Research shows that the restriction of ads can prevent or minimize the harms from gambling, especially among youth and other vulnerable groups.

The Campaign to Ban Ads for Gambling calls for the prohibition of ads for gambling in the same way that ads for tobacco and cannabis have been restricted.

A growing number of countries are adopting this solution. Australia is in the process of adopting a four step process, which will ban gambling advertisements within three years.

Table of Contents

| | |
|--|-----------|
| Glossary | 3 |
| Current Status: Gambling Advertising | 4 |
| 1. Background | 4 |
| 2. Gambling Advertising | 5 |
| 3. Gambling Advertising and Children, Youth, and Young Adults | 6 |
| 4. Gambling and Mental Health | 8 |
| 5. Gambling and Public Health..... | 9 |
| 6. Moving Forward | 10 |
| 6.1 Parallels to the Tobacco Experience..... | 12 |
| Appendix 1..... | 13 |
| Provincial Approaches to Internet Sport Gambling..... | 13 |
| Appendix 2..... | 14 |
| Ontario – Sport Betting Revenue | 14 |
| Appendix 3..... | 15 |
| European Approaches to Gambling Regulation,, | 15 |

Glossary

Gambling Advertising:

“Gambling advertising” refers to:

- print media in all its forms, including billboards,
- electronic and digital media, including television, radio and social media,
- electronic and print signage on or adjacent to the field of play in sport arenas and stadia,
- player uniforms,
- sponsorship of teams and events, and
- product placement, whereby sports commentators normalize gambling with betting information and encouragements to bet in their dialogue.

Gambling:

The term “gambling” refers to commercial gambling conducted by and operated by for-profit companies and organizations, including, but not limited to:

- casino table games,
- electronic gambling machines,
- sports betting, and
- internet gambling, including sports betting apps

Current Status: Gambling Advertising

1. Background

On May 14, 2018, the Supreme Court of the United States of America decided to allow sports betting. At that time all the professional sports leagues in North America were strongly opposed to gambling.

The Canadian response to the US decision came when Bill C-218 (the Safe and Regulated Sports Betting Act), a private members' bill proposing an amendment to the Criminal Code to legalize single event sports betting, was passed by the House of Commons in 2021. The bill received royal assent on August 27 of that year.

The impetus for the Bill was simply to regulate on-line gambling. There was no debate on the possibility of extensive advertising, or the harm gambling advertisements might cause. Fewer than a dozen members of the House of Commons opposed the Bill.

The federal legislation enabled the provincial and territorial governments to establish regulatory regimes for sports betting. Ontario was the first to do so, hoping that it could secure revenues lost to illegal gambling activities. (See Appendix 1)

The Ontario Government established iGaming Ontario on April 4, 2022, which in turn quickly registered 40 betting companies, some of which were operating in a grey zone before the Criminal Code amendment was passed. Those betting companies now have contracts with every professional sports league in North America—the Canadian Football League, Major League Baseball, Major League Soccer, the National Basketball Association, the National Hockey League¹, the National Football League, and the Women's National Basketball League. These betting companies also accept bets on some offshore competitions. Currently, internet gambling around professional sports has become pervasive.

In its first year of business, from April 4, 2022 to April 3, 2023, iGaming Ontario reported more than 1.6 million active player accounts and \$35.6 billion in total wagers, putting the province among the top five igaming jurisdictions in North America. Average spending by each registered player was \$167 a month in the third quarter of the year. (See Appendix 2)

Statistics Canada recently reported that 1.6% of adult gamblers in Canada, or 304,400 persons, are at moderate to high risk of gambling disorders.² In Ontario, based on the iGaming data, that would mean 25,600 persons experience these disorders. Gambling can lead to significant harm, including runaway debt, stress to families, low self-esteem, anxiety, depression, and even suicide

¹ Bell, E. (2021). Betting on Gambling: How Professional Sports Leagues Could Increase Revenues following Murphy v. NCAA. *J. Bus. Entrepreneurship & L.*, 14, 215, "[Betting On Gambling](#)" by Edward "Max" Bell ([pepperdine.edu](#))

² [Michelle Rotermann](#) and [Heather Gilmour](#), 'Who gambles and who experiences gambling problems in Canada', Statistics Canada, August 9, 2022, [Who gambles and who experiences gambling problems in Canada \(statcan.gc.ca\)](#).

– among other documented economic and social concerns. Gambling-related harms represent a significant potential driver of health inequalities because those already experiencing disadvantages (financial, social, and mental health) are also at increased risk of experiencing gambling-related harm.

The tax rate on sport betting in Ontario is twenty percent (20%), whereas in the neighbouring US State of New York, the sport betting tax is fifty-one percent (51%). The Province of Ontario could certainly be designated as “player friendly”.

While advocates of sports betting point to the new tax revenues generated for governments by the billions being wagered, both the rate of taxation and the distribution of those revenues bear scrutiny. Mental health advocates contend that the new revenues do not begin to cover the medical, social, and economic costs engendered by gambling addictions.³ Whatever the case, betting revenue should never be a substitute for a fair and progressive rate of personal and corporate tax as a means of addressing the vital needs of Canadian society.

2. Gambling Advertising

Professional sports organizations argue that betting drives fan engagement, hence it is worthwhile to encourage fans to gamble. Proponents argue that gambling is exciting, therefore it should be encouraged as it enhances the enjoyment of the spectator experience.

Advertisements for gambling have become pervasive during broadcasts of professional sports in Canada. For example, during the first National Hockey league playoff game between the Toronto Maple Leafs and Florida Panthers in May 2023, there were eight and a half minutes of advertising for gambling, and that does not include the advertisements on the ice or flashed on the boards.

An Ipsos survey published on January 18, 2023,^{3,4} found that “marketing for betting platforms has hit a fever pitch, from banner ads and billboards to primetime TV”. The survey concluded that “the sheer volume of advertising could have a negative cumulative effect” and that 48% of Canadians agree that “the volume of advertising is excessive and needs to be cut back”.

The Ipsos polling also found that Canadians are experiencing fatigue from gambling advertising with nearly half of Canadians thinking gambling advertising has gotten out of hand.

An accompanying ‘social listening analysis’ by Ipsos found that “negative posts about sports betting advertising on social media had surged by 820% between July and October 2022”.

With respect to the position of the media industry, it is interesting to note the position taken in June 2023, by the Guardian Media Group⁵. At that time The Guardian announced a global ban

³Latvala, T., Lintonen, T. & Konu, A. Public health effects of gambling – debate on a conceptual model. *BMC Public Health* **19**, 1077 (2019). <https://doi.org/10.1186/s12889-019-7391-z>

⁴ <https://www.ipsos.com/en-ca/how-much-too-much>

⁵ <https://www.theguardian.com/society/2023/jun/15/guardian-bans-all-gambling-advertising>

on gambling advertising, arguing it is unethical to take money from services that can lead to “addiction and financial ruin”.

The Guardian included a link to recent studies which “highlight a clear correlation between exposure to gambling advertising and increased intentions to engage in regular gambling”.

Many countries have now begun to restrict advertising for sports betting. For example, Belgium, Italy, and Spain have banned sport gambling advertisements altogether, and other European countries restrict advertisements to times and venues that are not seen by children and youth. (See Appendix 3)

3. Gambling Advertising and Children, Youth, and Young Adults

Underage gambling is common in Canada and can start in children as young as 9 or 10 years old.⁶

It is estimated that 10% of the audience for sports on television is made up of children and youth under 18 years of age. Gambling advertising, in both content and frequency, is particularly enticing to adolescents and other vulnerable persons, especially those struggling with gambling addiction

The Australian Gambling Research Centre has reported that ‘research into the advertising of other harmful products suggests advertising increases uptake and consumption, especially in the adolescent starter market’.

A study⁷ published by the Australian Gambling Research Centre of the Australian Institute for Family Studies found that among those who gambled in Australia, almost half (46%) were classified as being at some risk of gambling harm in the past 12 months (according to the *Problem Gambling Severity Index*⁸), with varying degrees of severity. The findings indicated that, of those who gamble, 77% males, age 18 to 34 years, were classified as being at risk of gambling harm and that 55% of females in the same age group were classified as being at risk. A recent survey⁹ commissioned by the US National Collegiate Athletic Association (NCAA) of more than 3,500 individuals between the ages of 18 and 22 years revealed that 58% of

⁶ Canadian Pediatric Society. [Teen gambling | Caring for kids \(cps.ca\)](https://www.cps.ca/teen-gambling)

⁷ Australian Gambling Research Centre. (March 2023). Gambling participation and experience of harm in Australia. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.

<https://aifs.gov.au/research/research-snapshots/gambling-participation-and-experience-harm-australia>

⁸ At-risk gambling during the past 12 months was assessed using the nine-item *Problem Gambling Severity Index* (PGSI). Respondents were grouped into four categories based on their scores: non-problem gambling (0), low-risk gambling (1-2), moderate-risk gambling (3-7) and problem gambling (8-27). Respondents scoring 1+ may be classified as being at some risk of, or already experiencing, gambling problems.

⁹ https://ca.finance.yahoo.com/news/young-adults-betting-more-sports-130000092.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xiLmNvbS8&guce_referrer_sig=AQAAAId4wnKeNttfXUECDY3FqKSuVF8OarUPwC_Wphu6VKbGbd-dmO74MNN771DRx2O33nIi5NpPv8_15otEiDczHDeXH7v3M4fVKAFOEadivIWOOsDtsEK8ACEIrT7uZkeSSo-RIL7tPmFqUjhTC_xDCuCOJh2id3ZdirGGbYX93h

respondents admitted to making at least one sports wager, while 67% of students living on a college campus stated they are bettors and bet more frequently.

In the poll, 79% of participants reported betting between \$1 and \$50 every play, with \$10 to \$20 being the most frequent amount bet.

An April 2023 review of literature concluded that “the evidence justifies suggesting a total ban on commercial advertising for gambling, as occurs with tobacco in many jurisdictions.”¹⁰ This position was underscored based on the following policy principle.

The primary responsibility for action to protect children and young people rests with governments.

The authors further noted that the “evidence clearly shows the normalizing impact of marketing on children and young people’s gambling attitudes and consumption intentions. Current regulatory efforts are inadequate and have not protected children and young people from exposure to a range of different forms of marketing. Young people and their parents support the implementation of significant restrictions on gambling marketing.”

Their concluding policy position was that “the array of marketing mechanisms used by the gambling industry should be addressed as part of a comprehensive public health policy approach to protect children from gambling harms.”¹¹

In March 2018, GambleAware commissioned two independent consortia to assess the extent, nature and impact of gambling marketing and advertising on children, young people, and vulnerable groups in the United Kingdom. The first consortium was led by Ipsos MORI (in partnership with University of Bristol, University of Edinburgh, Ebiquity and the Centre for Analysis of Social Media at Demos), and the second by the University of Stirling (in partnership with ScotCen Social Research, University of Glasgow, and University of Warwick).

The final synthesis report concluded that that sheer exposure to gambling advertising can have an impact on attitudes towards the prevalence and acceptability of gambling, and in turn the susceptibility to gamble in the future. Furthermore, the rise of new forms of gambling marketing through social media have increased the ways in which children, young people and vulnerable adults can engage with gambling brands, often innocently, in such a way as to develop brand loyalty.¹²

¹⁰ Samantha Thomas, May C I van Schalkwyk, Mike Daube, Hannah Pitt, Darragh McGee, Martin McKee <https://doi.org/10.1093/heapro/daac194>

¹¹ *ibid.*

¹² [The effect of gambling marketing and advertising on children, young people, and vulnerable adults - Final Report - Ipsos MORI](#). March 2020.

4. Gambling and Mental Health

Problem gambling was classified as a non-substance-related addictive disorder by the American Psychiatric Association in 2013¹³. The *Diagnostic and Statistical Manual of Mental Disorders*, 5th edition, (DSM-5) defines and explains the gambling addictive disorder in the following manner.

Gambling can cause low self-esteem, stress, anxiety, and depression if gambling becomes a problem. Gambling can become an addiction, just like drugs or alcohol, if you use it compulsively or feel out of control. Gambling can affect the part of our brain that releases dopamine.

According to the DSM-5, a person has a gambling disorder if they display recurring problematic behavior that causes distress or impairment. They must show at least four of the following behaviors within a year: ¹⁴

- preoccupation with gambling
- a need to gamble with more money each time
- difficulty cutting back or stopping gambling
- irritability when trying to cut back on gambling
- regularly gambling when feeling depressed or anxious
- chasing losses, or trying to regain lost money by continuing to gamble
- lying to conceal gambling activities
- committing illegal acts to finance compulsive gambling
- loss of a relationship, job, or other opportunities
- reliance on other people for money to pay back gambling debts

People with gambling addiction have difficulty controlling their gambling behavior, even when it is adversely impacting their life.

Recently the Illinois Institute for Addiction Recovery has identified the following four phases in gambling addiction:¹⁵

1. The Winning Phase
2. The Losing Phase
3. The Desperation Phase
4. The Hopeless Phase

¹³ *Diagnostic and Statistical Manual of Mental Disorders*, 5th edition (DSM-5) American Psychiatric Association, 2013; see also Elizabeth Hartney. How Gambling Disorder is Defined in the DSM-5, [How Gambling Disorder Is Defined According to the DSM-5 \(verywellmind.com\)](https://www.verywellmind.com/how-gambling-disorder-is-defined-according-to-the-dsm-5-verywellmind-com/).

¹⁴ What are the Phases of Gambling Addiction, *PsychCentral*, March 18,2022: <https://psychcentral.com/addictions/four-phases-and-steps-of-gambling-addiction>

¹⁵ *ibid*

The harmful impact of gambling advertising has also been raised in the recent brief from the Ontario-based Centre of Addiction and Mental Health. (CAMH).

The CAMH review of the scientific literature¹⁶ concluded “that there is a causal relationship between people’s exposure to gambling advertising and their intentions to gamble as well as increased gambling activity. 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.”

5. Gambling and Public Health

In addition to the mental health risks, gambling poses a public health challenge.

The *Canadian Safety Council* considers gambling addiction a community safety and crime prevention issue.¹⁷ The Council stated that addiction to gambling is linked to a range of serious personal and social harms such as depression and suicide, bankruptcy, family breakup, domestic abuse, assault, fraud, theft, and even homelessness. These effects can be devastating to the individual as well as their friends, family, workplace, and community.

This position is supported by a July 2020 article¹⁸ published on the University of Bath’s website, which explains how “the ‘gamblification’ of sports over recent years poses significant challenges for individuals, families, and community wellbeing according to new research”.

Further, there is a growing body of anecdotal evidence from mental health professionals suggesting that gambling is more than a 'public health challenge', it is a crisis or emergency.

This view is related to evidence that the gambling enterprise is reaching out to and engaging children and youth at a much younger age than ever before, and to the widespread use of mobile phones and social media by children and youth.

There have also been early warnings that government revenues gained from gambling do not and will not offset the additional social and economic costs of problem gambling, and the treatment, of gambling addiction.

The findings presented by the University of Bath in 2020 are supported and expanded upon in a 2023 article¹⁹ reviewing several scientific studies which focussed on the issue of gambling advertising.

¹⁶ <https://www.camh.ca/-/media/files/agco-submission-pdf.pdf>

¹⁷ <https://canadasafetycouncil.org/gambling-addiction>

¹⁸ <https://www.bath.ac.uk/announcements/growth-of-online-sports-betting-poses-significant-public-health-challenge-new-study/>

¹⁹ McGrane, H. Wardle, M. Clowes, L. Blank, R. Pryce, M. Field, C. Sharpe, E. Goyder <https://www.sciencedirect.com/science/article/pii/S0033350622003420?via%3Dihub>

That review found that there was consistent support for “the existence of a causal relationship between exposure to advertising of gambling products/brands and more positive attitudes to gambling, greater intentions to gamble and increased gambling activity at both individual and population level.”

Further, the review found that there is “evidence of a ‘dose–response’ effect - greater advertising exposure increases participation which leads to a greater risk of harm. There was more evidence for the impact on children and young people and for those already at risk from current gambling activity with those most vulnerable more likely to be influenced.”

The authors concluded that “gambling advertising restrictions could reduce overall harm and mitigate the impact of advertising on gambling-related inequalities”, and proposed a policy position that “public health harm prevention strategies should include policies which limit exposure to advertising, particularly among children, and vulnerable groups.”

There have also been calls for a legal ‘duty of care’ on the part of gambling operators, similar to the responsibility of bartenders and licensed establishments to those who appear inebriated to refuse to serve them alcohol and ensure that they return home safely.²⁰ If adopted in Canada, this approach would see the financial burden that Canada’s publicly funded health care system currently bears for those with gambling addictions transferred to the gambling operators. The gambling industry would be responsible to reimburse the health care system for the medical and societal costs associated with gambling addictions – a disorder that they exploit.

6. Moving Forward

There is little question that the prevalence of gambling advertising on sports event broadcasting in Canada is excessive, and the federal government must assume a degree of responsibility for this situation.

When Bill C27 was enacted in 2021, with the support of all parties in the House of Commons, it was done so naively, with little consideration by the Members of Parliament of the harmful health and societal effects of gambling, especially on children, youth, young adults and other vulnerable people. Nor was it anticipated that the Canadian population would be subject to an unprecedented onslaught of gambling advertising in the print, electronic, and digital media.

The impact of the lack of due diligence on the part of Parliament, resulted, albeit unwittingly, in Canada opening its the doors for the gambling operators to proceed unfettered with advertisements promoting gambling.

²⁰ Hancock, L., & Smith, G. (2017). Critiquing the Reno Model I-IV international influence on regulators and governments (2004–2015)—the distorted reality of “responsible gambling”. *International Journal of Mental Health and Addiction*, 15(6), 1151-1176.

The Campaign to Ban Ads for Gambling seeks to ban all advertising for gambling, but understands that a phased in approach may be practical under the circumstances that have developed.

It is instructive to consider how Australia is contemplating dealing with this issue. The Australian Government has been concerned with gambling advertising for some time and in June 2023, a report ²¹ on the matter was issued by the responsible Parliamentary Committee. The Report listed thirty-one (31) recommendations.

A key recommendation is to ban gambling advertising within three years. The implementation of the recommendation would be accomplished in four phases.

Phase I: Ban all social media and online advertising. Radio advertising during school drop-off times would also be prohibited.

Phase II: Broadcast advertising for an hour either side of sporting broadcasts would be banned.

Phase III: Prohibit all broadcast advertising for gambling between 6am and 10pm.

Phase IV: Three years on, television gambling advertising banned.

A recent article ²² (June 30, 2023) by Charles Livingstone, an Associate Professor in School of Public Health and Preventive Medicine at Monash University, Melbourne, Australia noted the equally significant recommendations to adopt public health principles to prevent gambling harm. He stipulates that:

Preventing harm is a better goal than the current practice of ignoring harms until they become overwhelming. Building a fence at the top of the cliff, rather than providing a fleet of ambulances at the bottom, seems sensible.

The proposed Australian harm reduction approach, which addresses the public health and mental health impact of gambling addiction, begins to address the long-term or downstream issues associated with gambling addiction.

²¹https://www.aph.gov.au/Parliamentary_Business/Committees/House/Social_Policy_and_Legal_Affairs/Onlinegamblingimpacts/Report/List_of_recommendations

²² <https://theconversation.com/australia-has-a-strong-hand-to-tackle-gambling-harm-will-it-go-all-in-or-fold-208749>

Because Canada provided the gambling industry with a clean field for its advertising it would be fair for the Federal Government, which has regulatory authority over broadcasting²³, to provide the gambling industry and the broadcasters with an approach which would phase-out gambling advertising. This would allow the gambling enterprise time to adjust and time for broadcasters to find alternative sources of advertising revenue.

6.1 Parallels to the Tobacco Experience

Notwithstanding the direct authority that the Federal Government has with respect to broadcast advertising, there is a need to limit the current excessive gambling advertising now in place, and which is beyond the auspices of the Canadian Radio and Television Commission (CRTC).

To address the broader types of gambling advertising it is instructive to consider the success of the Canadian Tobacco Regulations²⁴. The limits on tobacco advertising in Canada provide a viable model to deal with gambling advertising in Canada.

The rationale for the limits on tobacco advertising was the pressing concern for the health consequences on tobacco use and the position that advertising and promotion of tobacco positively impacts the use of tobacco products. As tobacco use typically begins in adolescence, the objective for the limits of tobacco advertising, is to protect children and young adults from tobacco uptake.

As has been presented in this paper, there are strong parallels between tobacco addiction and gambling addiction. Therefore, it is reasonable to suggest that a comparable approach be adopted as it pertains to gambling advertising. The development of a similar regulatory regime, to be implemented on a phased manner as has been proposed in Australia, would be a sensible and worthy model for Canada to strongly consider.

²³ Canada's Broadcasting Act gives the Governor-in-Council (the federal Cabinet) the power to give policy direction to the Canadian Radio and Television Commission (CRCTC).

²⁴ In Canada the [*Tobacco Products Regulations \(Plain and Standardized Appearance\)*](#) were adopted to protect young persons and others from inducements to use tobacco products and the consequent dependence on them, and to prevent the public from being deceived or misled with respect to the health hazards of using tobacco.

Appendix 1

Provincial Approaches to Internet Sport Gambling

1) The Ontario Government has created a competitive approach, with 40 regulated operators, many of them large U.S.-based brands such as FanDuel and MGM.

The other nine Provinces have allowed single-sports betting, but only through some version of their respective provincial lottery corporations.

2) Alberta's liquor-and-gaming regulator reported that just two per cent of its internet gambling sales, a little over \$2.7million, came from sports betting in 2022. Gamblers anywhere in Canada still have the option of using grey-market operators, usually based offshore, which existed long before legalization. It has led to an odd dichotomy with Ontario having thrown open its doors to gambling companies and the rest of the country proceeding cautiously.

Ontario's relative size and media centrality also means that gambling advertising on high-profile national programming such as Hockey Night in Canada or Monday Night Football is also seen by viewers in other provinces. They are inundated with promotions for apps and sites that are legally unavailable to them.

Source: Postmedia News; sstinson@postmedia.com

Appendix 2

Ontario – Sport Betting Revenue

Ontario Sport Betting market considered to be still in its infancy

- Sport Gaming Betting revenue: (2022 – first year of operation)
 - Oct 31- Dec. 31, 2022, \$457 million
 - July 31 – Sept. 30, 2022, \$267 million
 - 71% increase from 3rd quarter to 4th quarter
 - Up 186 % from revenue in 1st quarter (\$162 million)
 - Gross revenue for full year 2022/23 – estimated to be \$197.8 million (source Vixio).

- Value of Bet/Wagers Placed
 - April to Dec. 31, 2022, \$21.6 Billion
 - Steady and sharp growth in wagers
 - April to June 2022 \$4.067 Billion
 - 3rd quarter (Oct-Dec. 2022) \$11.53 Billion (91% increase over 2nd quarter)

- Number of players
 - 910,000 in 3rd quarter (45% increase over 2nd quarter and 85 % increase over 1st quarter).

- Average Monthly Spend/ active player
 - At end of Dec. 2022 \$167.00 (18% increase over 2nd quarter).

- Number of Operators and Gaming Websites Ontario²⁵
 - At end of Dec. 2022
 - 40 operators (50% increase over 2nd quarter)
 - 18 operators in 1st quarter and 24 in 2nd quarter
 - 76 gaming websites (62 % increase over 2nd quarter)
 - 31 gaming websites in 1st Quarter and 42 in 2nd quarter

Source: iGaming Ontario (a subsidiary of the Alcohol and Gaming Commission of Ontario)

²⁵ https://ca.finance.yahoo.com/news/young-adults-betting-more-sports-13000092.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xILmNvbS8&guce_referrer_sig=AQAAAld4wnKeNttfXUECDY3FqKSuVF8OarUPwC_Wphu6VKbGbd-dmO74MNN771DRx2O33nIi5NpPv8_l5otEiDczHDeXH7v3M4fVKAFOEadivIWOOsDtsEK8ACeIrT7uZkeSSo-RIL7tPmFqUjhTC_xDCuCOJh2id3ZdirGGbYX93h

Appendix 3

European Approaches to Gambling Regulation^{26, 27, 28}

Italy, the Netherlands, Belgium, Spain, and Germany all have restrictions around sports betting given the close relationship between sport (particularly football) and gambling. Belgium, the Netherlands, Spain, and Italy have strong restrictions on most sports betting marketing including betting ads during football matches and full sponsorship bans.

- **Italy:** At the start of 2019, Italy banned almost all gambling marketing. The Decreto Dignità (Dignity Decree) prohibited all TV, radio, press and internet gambling marketing. This blanket ban was brought in shortly after a study highlighted that 3% of the Italian population was suffering from gambling harms.
- **Belgium:** In 2018 Belgium banned the broadcasting of gambling adverts 15 minutes before or after children’s programming, public posters for gambling, and direct advertising to named individuals in any form. Even these moves were deemed inadequate, with the Belgian Justice Minister arguing last year: “Gambling advertising is fired at us from all sides every day and encourages these addictions, including among young people.”

Subsequently, the Belgian government approved new legislation in December 2022 to ban gambling advertising almost entirely as of July 2023. . It will ban advertising in stadiums from 2025 and sponsoring of sports clubs in 2028.

- **The Netherlands:** The Netherlands has focused on restricting mass marketing on television, radio, internet search engines and public spaces. This approach aims to prevent a “bombardment” of gambling ads, particularly to children and young people. The Netherlands will ban all TV, radio, print and billboard gambling ads from July, with strict conditions on online advertising. A ban on club sponsorship will come into effect in 2025

²⁶ Raffaello, Rossie, Agnes Nairnm, Ben Ford, and Jamie Wheaton, University of Bristol. *Gambling Act review: how EU countries are tightening restrictions on ads and why the UK should too*: February 14, 2023.

<https://theconversation.com/gambling-act-review-how-eu-countries-are-tightening-restrictions-on-ads-and-why-the-uk-should-too-199354>)

²⁷ <https://euroweeklynews.com/2021/08/31/spain-ban-gambling-advertising/>

²⁸ <https://theconversation.com/sport-is-being-used-to-normalise-gambling-we-should-treat-the-problem-just-like-smoking-205843>).

- **Germany:** Germany’s June 2021 *State Treaty on Gambling* includes a ban on advertising to minors or at-risk groups (such as people likely to suffer from certain mental health conditions, or who previously suffered from a gambling addiction).

Germany has a “watershed” approach to licensed online casinos, poker, and virtual slot operators. Gambling advertisements for these providers are prohibited on radio, TV, and the internet between 6am and 9pm.

Advertising with active athletes and officials is prohibited.

- **Spain:** Spain imposed a blanket ban on gambling advertising in 2021.
- **United Kingdom:** The Premier League last month (June, 2023) agreed to ban bookies’ logos from player match shirts, though critics argue this barely addresses the scale of the problem.

| | Sports sponsorship and advertising | Public posters | Targeted ads | Online advertising | TV & Radio Advertising | Social media influencers | TV ads during sport events |
|------------------------------------|------------------------------------|----------------|--------------|--------------------|------------------------|--------------------------|----------------------------|
| Italy | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Belgium <i>(from July 2023)</i> | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Netherlands | ✗ | ✗ | ✓ | ✓ | ✗ | ✗ | ✗ |
| Germany | ✓ | ✓ | ✓ | ✗* | ✗* | ✓ | ✗ |
| UK | ✓ | ✓ | ✓ | ✓ | ✓** | ✓ | ✓*** |

✗ = Banned, ✓ = Permitted

* Excluded from the ban are sports betting ads and ads between 9pm-6am
 ** Ban only for TV ads before 9pm
 *** Voluntary ban by parts of the industry, excludes horse and greyhound racing

Who we are

We are a group of sports-loving Canadians deeply disturbed by the proliferation and content of advertising for sports betting during televised sports, on social media, and on billboards in and around arenas and stadia. We are Olympians, sports leaders, and parents of athletes, as well as researchers and teachers.

The steering committee includes Alan Broadbent, Robin Campbell, Peter Donnelly, Joel Finlay, Gretchen Kerr, Bruce Kidd, John Macfarlane, Ian Morrison, Wayne Olson, John Sewell and Karl Subban. Racheal Kalaba provided research.

The Committee to Ban Ads for Gambling does not seek to prohibit gambling itself. Our goal is federal legislation similar to that which already prohibits the advertising of tobacco and cannabis. Gambling, too, can be harmful. See BanAdsForGambling.ca