SUBMISSION TO THE HOUSE OF COMMONS STANDING COMMITTEE ON CANADIAN HERITAGE

BILL S-211

An Act Respecting a National Framework on Sports Betting Advertising

An Evidence Brief on Sports Betting Advertising

Submission From

greo. EVIDENCE INSIGHTS

Canadian Centre on Substance Use and Addiction

The following organizations and individuals have reviewed this submission and agreed to be named as supporters. If you or your organization would like to be included among the supporters, please email matthew@greo.ca.

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Académie canadienne de psychiatrie de l'enfant et de l'adolescent

Canadian Mental Health Association
Mental health for all
Association canadienne pour la santé mentale
La santé mentale pour tous

Canadian Paediatric Society
Société canadienne de pédiatrie

Canadian Psychiatric Association
Association des psychiatres du Canada

CANADIAN PUBLIC HEALTH ASSOCIATION
ASSOCIATION CANADIENNE DE SANTÉ PUBLIQUE

CSAM Canadian Society of Addiction Medicine
SMCA La société médicale canadienne sur l'addiction

camh mental health is health

CENTRE for GAMBLING RESEARCH at UBC

Children's Healthcare Canada
Santé des enfants Canada

International Centre for Youth Gambling Problems and High-Risk Behaviors
WWW.YOUTHGAMBLING.COM

RECHERCHE EN SANTÉ MENTALE CANADA
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About This Submission

This submission reflects the collective expertise of Canadian organizations working in gambling research, substance use and addiction, mental health, public health, clinical care, prevention, treatment, public policy, evidence synthesis, and knowledge mobilization. We support policy grounded in the best available evidence, proportionate to risk, transparent about uncertainty, and attentive to children, youth, and other populations at elevated risk. The need for action is increasingly urgent: since the legalization of single-event sports betting, gambling advertising and promotion have become more visible and more deeply embedded in sports and digital media, while emerging Canadian evidence points to increasing gambling-related harm and help-seeking, particularly among young people.

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Recommendations to the Committee

The organizations supporting this submission recommend that the committee:

- Advance Bill S-211;
- Recognize that sports betting advertising operates within a broader online gambling ecosystem, including online casino products, and consider measures to address all online gambling advertising and promotion; and
- Ensure that the framework places public health at its centre, with the protection of children and youth as a central priority, alongside young adults, people in recovery, people affected by others' gambling, and other populations at elevated risk.

Although sports betting advertising may draw people to online betting sites and apps, evidence suggests that online casino products, including slots and other online games, account for most of the total amount wagered online (iGaming Ontario, 2026).

Gambling advertising and promotion now extend beyond traditional advertising (television, radio and print) to promotion embedded in sports and other content, including sponsorship, branded content and betting odds, as well as digital promotion through direct marketing, social media, influencers, affiliates, and other digital channels. Together, these forms of promotion operate across a communications ecosystem involving broadcasters, sports organizations, digital platforms, advertisers, and other intermediaries. The ecosystem spans provincial and territorial boundaries and multiple areas of regulatory responsibility, including communications and broadcasting systems subject to federal oversight. This complexity makes national coordination essential to effective provincial and territorial gambling regulation.

Bill S-211 does not itself aim to ban sports betting advertising or prescribe a final set of advertising rules. It requires the federal government to develop a national framework through broad consultation. Those consulted would include provincial and territorial governments and gaming regulators, affected people, service providers, Indigenous communities and organizations, researchers, health professionals, sports organizations, and industry. The framework would consider international evidence for different regulatory measures, promote research and intergovernmental information sharing, and establish national standards related to preventing and diagnosing harmful gambling and supporting affected people (*Bill S-211*, 2025).

We recommend advancing the bill for four principal reasons:

- Gambling advertising and promotion influence attitudes and behaviour and are associated with greater gambling participation, frequency, spending and gambling-related harm.
- Children, youth, young adults, people in recovery, and people already experiencing gambling-related problems require greater protection from pervasive and targeted promotion.
- Emerging Canadian evidence raises concern about increasing gambling-related harm and help-seeking, especially among young Canadians.
- Online gambling advertising and promotion cross provincial and territorial borders, undermining legal online gambling products in individual jurisdictions and limiting the ability of any jurisdiction to manage these issues independently.

Bill S-211 offers a measured way to address these concerns. National coordination can complement — and strengthen — provincial and territorial gambling governance while providing the common objectives, evidence and cross-jurisdictional tools required for an increasingly borderless digital market.

Why Bill S-211 Is Necessary

Advertising Influences Gambling Behaviour and Harm

A substantial evidence base links gambling advertising exposure with more favourable attitudes toward gambling, stronger intentions to gamble, greater gambling participation and greater gambling-related harm. A 2023 review covering 74 studies found consistent associations, including evidence that greater exposure was associated with greater gambling involvement (McGrane et al., 2023). A 2025 review of 22 studies on sports betting advertisements associated exposure with gambling likelihood and frequency, spending, unplanned gambling, advertised product use and, in some studies, riskier bets (McGrane et al., 2025). Newer experimental research on direct gambling marketing provides stronger evidence of harm. In one real-world experiment, people who stopped receiving direct gambling promotions placed fewer bets, spent less money, and reported fewer short-term gambling harms than those who continued receiving them (Rockloff et al., 2026).

The precise effects of advertising vary by content, medium, audience, product, and regulatory environment. A national framework should therefore combine proportionate restrictions with ongoing evaluation. That approach recognizes uncertainty while acting on the evidence already available, rather than requiring a level of causal certainty that is inherently difficult to achieve in population-level research.

Populations at Elevated Risk Require Particular Protection

Advertising effects are not evenly distributed. Children and youth encounter gambling promotion through sports and digital media even when it is not formally directed at them, helping to make gambling appear routine — a process referred to as "normalization" (Charlebois & Kelly, 2025; Young et al., 2024; Robb & Mann, 2026). Young men who bet on sports report frequent exposure to advertising and its influence (Seher et al., 2026). These findings matter because earlier gambling involvement is associated with a greater risk of problem gambling later in life (Gupta & Derevensky, 1998; Volberg et al., 2010). In developing a national framework, particular consideration should therefore be given to strong protections that limit minors' exposure to gambling promotion. Such protections could include restrictions on promotion in media and digital environments readily accessible to minors and on promotional content, personalities and other features likely to appeal strongly to children and youth. Federal approaches to cannabis, tobacco and vaping promotion provide useful models from which such protections could be adapted (Gagnon, 2025).

In addition to young people, people in recovery from problem gambling and those experiencing gambling problems may also be more affected. Advertising effects are stronger among higher-risk gamblers, and gambling cues are known to trigger craving among people trying to reduce or stop their gambling (McGrane et al., 2025; Hanss et al., 2015; Limbrick Oldfield et al., 2017).

Canadian Evidence Raises Concern About Increasing Harm

Canada currently lacks a comprehensive, funded national system for monitoring gambling-related harm. Limited monitoring and surveillance data makes it difficult to determine the full effects of recent gambling policy changes on the health of people in Canada, particularly outside Ontario. Nevertheless, emerging evidence from Ontario points to a concerning post-2021 pattern.

- Calls to the province of Ontario's free 24-hour mental health and addiction hotline (ConnexOntario) related to problem gambling have increased substantively since 2021. The largest increases were in boys and young men aged 15 to 24 where calls increased by 144%. No increases were seen in women (Forrest et al., 2026).
- In 2025, among Ontario students in grades 7 to 12:
    - Nearly one-quarter (23%) reported seeing or hearing online gambling advertising every day;

  - 12% reported gambling online in the previous year, up from 4.3% in 2019; and
  - Online gambling participation was higher among males than females (16.6% vs. 6.0%) and increased with grade, from 8.8% among Grade 7 students to 14.6% among Grade 12 students (Boak & Hamilton, 2026).

- An analysis of Ontario insolvency records found that between 2021 and 2025 the number of people citing gambling as a reason for bankruptcy had quadrupled (Penrose, 2025).
- Between 2018 and 2025, Ontario was the only province in Canada showing an increase in problem gambling rates (from 0.3% to 0.8%),[1] with an additional 57,500 people flagged as experiencing significant gambling problems (Williams, 2026).
- In 2025, emergency department visits for gambling disorders doubled following the legalization of single-event sports betting and expansion of Ontario's online gambling market. Visits were 154% higher than expected among males aged 10 to 29 and 116% higher among males aged 30 to 44, with no increase observed among females (Forrest et al., 2026).
- Early data suggests the province may be seeing an increase in gambling-involved suicide deaths (M. M. Young, personal communication, 2026).

Evidence of increasing financial harms following the legalization of sports betting in several U.S. states is also emerging (Dasgupta & Ghimire, 2026; Goss & Mangrum, 2026; Hollenbeck et al., 2025).

Canada is now several years into a major policy shift that increased the availability of online gambling and the visibility of its promotion, without comparable investment in monitoring its effects on population health. A coordinated national approach is needed to identify emerging harms, compare experiences across jurisdictions, and assess both the intended and unintended effects of regulatory changes.

Online Gambling and Advertising Cross Provincial and Territorial Borders

Provinces and territories are responsible for conducting and managing gambling. This system was developed when gambling was largely land-based and geographically contained within provincial or territorial borders. Online gambling has fundamentally changed that environment. Gambling websites, apps, sports broadcasts, social media promotion, sponsorships, podcasts and digital advertising can reach audiences across Canada, regardless of where an operator, broadcaster, or platform is licensed (Young et al., 2024; Murch et al., 2026).

In short, online gambling and its promotion now routinely cross provincial and territorial boundaries. A province or territory may adopt stronger limits on gambling advertising or availability, yet its residents may still be exposed to advertising and market activity from online operators licensed in a different province. This limits the ability of any single province or territory to manage its residents' exposure to gambling advertising.

A coordinated national framework can help address these cross-jurisdictional risks by supporting cooperation among governments, regulators, health and research organizations and other actors involved in the systems through which gambling is promoted and accessed.

National Coordination Is Necessary

National coordination would complement, not replace, provincial and territorial governance. A framework can establish shared public health objectives, improve information sharing and support comparable monitoring. It

[1] This is new, as-yet-unpublished data from Statistics Canada's first probability-based population health survey to assess past-year problem gambling severity. Other surveys using non-probability online panels have reported higher estimates (e.g., *Online Gambling Among Young Canadian Adults: A Call to Action*).

can also provide a coordinated approach to channels to advertising and promotion across provincial and territorial boundaries and areas of regulatory responsibility, including communications and broadcasting systems subject to federal oversight. Bill S-211 expressly requires consultation with provincial and territorial governments and regulators.

Coordination is also needed because many systems through which online gambling is advertised, accessed and funded fall outside the direct control of gambling regulators. Effective oversight of legal and illegal operators increasingly requires cooperation across federal, provincial, and territorial authorities. Cooperation is also needed with communications regulators, payment providers, financial institutions, app stores, search engines, social media platforms and other digital intermediaries. A national framework can help identify where coordinated action is required across these different systems and authorities.

Common Arguments Against Bill S-211

Several arguments are commonly raised against Bill S-211 or stronger national action. Each contains a concern worth considering, but none eliminates the case for a coordinated framework.

Argument: There Is No Causal Evidence Linking Gambling Advertising and Gambling Harm

Some opponents of Bill S-211 may argue that action should wait until there is definitive causal proof that gambling advertising causes harm. Although evidence of a causal relationship is beginning to emerge (Rockloff et al., 2026; Hing et al., 2025), requiring definitive proof of causation sets the bar too high for public health policy. In real-world advertising environments, such proof is difficult to produce, and its absence should not be treated as evidence that gambling advertising is safe.

Debate about the causal relationship between gambling advertising and harm prompted a large international group of researchers to caution that the inherent difficulty of producing definitive causal evidence should not be interpreted as evidence of safety (Newall et al., 2024). The view that gambling advertising contributes causally to gambling-related harm is now broadly accepted within the gambling research community (Newall & Swanton, 2024).

Argument: Gambling Advertising Is Already Adequately Regulated

Provincial rules exist and some have been strengthened. Industry has also introduced voluntary national advertising standards. These measures are meaningful, but they do not constitute a comprehensive, enforceable national framework and they differ in scope, application and oversight across Canada. Residents of provinces and territories that have chosen more restrictive models, including those where a Crown corporation is the sole regulated online gambling operator, may still be exposed to advertising from operators

licensed elsewhere, including Ontario and Alberta. The argument that advertising is already adequately regulated is therefore not supported, given that significant gaps and inconsistencies remain. A national framework can help address these gaps and inconsistencies while preserving provincial and territorial roles.

Argument: Advertising Is Needed to Move People from Illegal Sites to Regulated Sites

Channelization — moving people who gamble from illegal sites to regulated operators — is a legitimate public policy objective,[2] and authorized operators need appropriate ways to identify their services as regulated. However, advertising that increases overall gambling participation, frequency, or spending can also contribute to market growth and gambling-related harm. The policy challenge is therefore to achieve the benefits of channelization without simply replacing harms associated with illegal gambling with harms arising from greater overall gambling participation in an expanding legal market. Although Ontario has achieved high rates of channelization (iGaming Ontario, May 21, 2026), these rates have coincided with substantial growth in the regulated market[3] and increases in gambling-related harm and help-seeking, particularly among young Canadians, as reviewed above.

Where illegal gambling is a genuine concern, advertising should not be treated as the primary tool for addressing it. Advertising can help consumers identify regulated operators, but it can also increase gambling participation, spending, and associated harms. Effective channelization therefore requires a balance: allowing regulated operators to identify themselves while relying on strong enforcement to reduce access to and use of unauthorized gambling. Effective enforcement requires adequate enforcement capacity and coordination with payment providers, financial institutions, app stores, search engines, social media platforms and other intermediaries.

Although Bill S-211 does not prescribe enforcement measures, the intergovernmental dialogue and information sharing it requires could support a more balanced approach: proportionate limits on advertising, clear identification of authorized operators and stronger coordinated action against unauthorized gambling.

A Useful Canadian Comparison: Cannabis Legalization

The *Cannabis Act* established a federal framework that explicitly incorporates public health and youth protection objectives and places substantial restrictions on promotion, while enabling legal provincial and territorial cannabis markets. Canada's subsequent review found a substantial shift from the illegal to the legal market despite those restrictions. The comparison is not exact, but it illustrates two important principles. First, the federal government can establish an overarching regulatory framework that includes public health objectives and restrictions on advertising and promotion while still enabling legal markets at the provincial and territorial levels. Second, restrictions on advertising and promotion and advertising do not necessarily prevent a shift in activity from illegal to legal markets.

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[2] Though a legitimate policy objective, it is important to recognize a tension in some channelization arguments. Some lobbying efforts that warn about illegal or unregulated gambling are undertaken on behalf of operators whose sites are used by people in jurisdictions where those operators are not provincially or territorially authorized. This tension is illustrated by Loto-Québec's response to international operators advocating for an Ontario-style market in Quebec (Orme-Clay, Feb 26, 2026). In effect, some companies invoking the dangers of the illegal market to support expanded market access or oppose advertising restrictions also operate in jurisdictions where they are not authorized.

[3] Quarterly wagers through regulated private operators increased from $4.08 billion shortly after the market opened in 2022 to $22.9 billion by early 2025 (iGaming Ontario, 2026).

Argument: Gambling Is Provincial, So the Federal Government Should Not Be Involved

Provinces and territories remain central to conducting and managing gambling, but gambling stopped being a strictly provincial or territorial issue when online gambling advertisements relevant only to Ontario became widespread across Canada. Bill S-211 responds to this cross-border dimension through coordination rather than displacement and expressly requires consultation with provincial and territorial governments and gaming regulators. Shared national tools can strengthen provincial and territorial regulation where individual jurisdictions have limited leverage over advertising and communications systems that cross their borders.

Canada already uses national advertising or promotion restrictions for other addictive, provincially or territorially regulated products, including the Canadian Radio-television and Telecommunications Commission's *Code for Broadcast Advertising of Alcoholic Beverages* (1996) and federal restrictions on tobacco and cannabis promotion (Government of Canada, 1997, 2018). The gambling industry has also recently introduced voluntary national advertising standards through the Canadian Gaming Association's *Code for Responsible Gaming Advertising* (2025). These standards are a meaningful development, and through their national scope, implicitly recognize the value of consistency and coordination across jurisdictions. However, voluntary, industry-led standards have inherent limitations and are not a substitute for a coordinated national framework as proposed in Bill S-211.

Argument: Gambling Advertising Is Only a Small Share of All Advertising

Gambling advertising may represent a small percentage of all advertising, but that tells us little about exposure or the impact of advertising among people who watch sports, where gambling promotion is concentrated. Gambling promotion is now embedded directly into sports through signage, sponsorships, odds integrations, graphics, commentary, branded content and social media (Seher et al., 2026). In a Canadian study of seven NHL and NBA broadcasts, researchers identified over 3,500 gambling references on the playing surface and in televised commentary, visible during 21.7% of total broadcast time. The same study identified 582 social media advertisements from Ontario-licensed operators that generated more than 5.6 million views (Wheaton et al., 2025).

The overall share of advertising also tells us little about how much gambling advertising has increased since the 2021 *Safe and Regulated Sports Betting Act* and the subsequent expansion of commercial online gambling. The relevant question is not whether gambling advertising is small compared with advertising for every other product combined, but whether the current level of promotion is appropriate for a product that is regulated due to its propensity to cause addiction and other harms.

Policy makers do not determine appropriate limits on advertising for other potentially addictive products by comparing the volume of such advertising with that for all other products. Tobacco promotion is broadly prohibited, and cannabis promotion is subject to extensive federal restrictions. Given evidence that online gambling products such as online casino games and slots may be particularly harmful relative to other gambling formats (Tran et al., 2024), the more relevant public health question is whether the nature and extent of gambling promotion are proportionate to the risk of harm.

Conclusion

The case for supporting Bill S-211 is that gambling advertising and promotion have expanded rapidly, are deeply embedded in sports and digital media and now cross provincial and territorial borders. The best available evidence indicates that advertising and promotion influence gambling attitudes, intentions and participation. Children, youth, young adults, people experiencing problem gambling, people in recovery and people affected by others' gambling warrant particular protection. Emerging Canadian evidence also points

to increased gambling-related harms and help-seeking during the period in which online gambling has expanded.

Canada's current regulatory architecture was built for provincial and territorial gambling markets that were geographically contained. It is increasingly difficult for individual provinces and territories to manage the public health effects of a digitally integrated market. Gambling advertising and promotion now cross provincial and territorial boundaries and involve multiple areas of regulatory responsibility, including communications and broadcasting systems subject to federal oversight.

A national framework should not displace provincial and territorial responsibility. Instead, it should provide a missing layer of coordination to support shared public health objectives, stronger monitoring of harm, better information sharing and more consistent responses to cross-border advertising and promotion of unauthorized gambling. For these reasons, the organizations supporting this submission encourage the committee to advance Bill S-211, ensure that the framework addresses all online gambling products and promotion, not just sports betting advertising, and preserve its central commitment to a coordinated, evidence-informed national response.

Further Reading

Committee members and staff wishing to examine the evidence in more detail can find a curated list of selected Canadian and international reports and studies at https://www.greo.ca/en/bill-s-211-further-reading.aspx

Selected Reports and Studies

Gambling Availability and Advertising in Canada: A Call to Action

This Canadian policy report from the Canadian Centre on Substance Use and Addiction (CCSA) and Greo Evidence Insights examines the expansion of online gambling and promotion. It explains why digital gambling creates cross-border regulatory challenges and calls for a pan-Canadian response that includes national advertising standards and stronger monitoring of gambling-related harm.

Source: https://ccsa.ca/en/gambling-availability-and-advertising-canada-call-action

The Promotion of Alcohol, Cannabis, Gambling, Tobacco and Vaping Products: A Comparative Analysis of the Potential of Legal Frameworks to Limit Exposure Among Minors

This CCSA report compares Canadian legal frameworks governing the promotion of alcohol, cannabis, gambling, tobacco and vaping products from the perspective of limiting minors' exposure. It identifies the cannabis, tobacco and vaping frameworks as offering useful models for stronger youth protections and highlights limitations in regulatory approaches that do not adequately address modern promotional channels, including social media.

Source: https://www.ccsa.ca/en/promotion-alcohol-cannabis-gambling-tobacco-and-vaping-products-comparative-analysis-potential

Gambling Policy Framework

The Centre for Addiction and Mental Health's updated policy framework summarizes evidence on gambling-related harms, gambling availability, online gambling and advertising and promotion. It also examines the limitations of approaches that focus primarily on individual responsibility. The framework recommends a public health approach that gives greater attention to the gambling environment.

Source: https://www.camh.ca/-/media/driving-change-files/public-policy/camh-gambling-policy-framework-pdf.pdf

What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature

This umbrella review synthesizes eight systematic reviews covering 74 unique studies. It provides a high-level summary of evidence linking gambling advertising with attitudes, intentions and gambling behaviour, including evidence consistent with a dose-response relationship.

Source: https://doi.org/10.1016/j.puhe.2022.11.019

What is the impact of sports-related gambling advertising on gambling behaviour? A systematic review

This systematic review focuses specifically on sports-related gambling advertising. Across 22 studies, exposure was associated with gambling participation, spending, unplanned gambling, use of advertised operators and, in some studies, riskier betting.

Source: https://doi.org/10.1111/add.16761

'No evidence of harm' implies no evidence of safety: Framing the lack of causal evidence in gambling advertising research

This peer-reviewed commentary by an international group of gambling researchers addresses claims that the absence of definitive causal evidence should be interpreted as evidence that gambling advertising is safe. It explains why causal evidence is difficult to establish in real-world advertising environments and argues for a more appropriate interpretation of uncertainty.

Source: https://doi.org/10.1111/add.16369

Gambling advertisements in Ontario: Exploring the prevalence and regulatory compliance of televised and social media marketing during sports matches

This detailed study directly measured gambling promotion during Canadian NHL and NBA broadcasts in Ontario and on social media. It shows that gambling exposure extends well beyond conventional commercial breaks and includes signage, sponsorship, odds and other embedded forms of promotion.

Source: https://doi.org/10.1080/14459795.2024.2400356

Help-seeking for gambling problems following expansion of Ontario's online gambling market and legalization of single-event sports betting

Published in the Canadian Medical Association Journal, this interrupted time-series study examined more than 745,000 ConnexOntario contacts over 13 years. It found increased gambling-related help-seeking following online gambling expansion, with the largest increases among younger males.

Source: https://doi.org/10.1503/cmaj.251894

Sports betting harm in young men: The impact of advertising

This Canadian fact sheet summarizes research with more than 1,800 people who bet on sports in Ontario and Alberta. It highlights elevated gambling-related harm and anxiety among men under 30 and frequent exposure to sports betting advertising.

Source: https://www.greo.ca/en/resources/Final_SportsBettingHarminYoungMen_TheImpactofAdvertising.pdf

Betting on Boys: Understanding Gambling Among Adolescent Boys

This U.S. report from Common Sense Media examines gambling among adolescent boys and the wider digital and media environment in which gambling and gambling-like activities appear. Although not Canadian, it addresses similar concerns about adolescent exposure to sports betting promotion, gambling-like features in video games, social media and other digital platforms.

Source: https://www.commonsensemedia.org/sites/default/files/research/report/2026-betting-on-boys-report_final-for-web.pdf

Online Gambling Among Young Canadian Adults: A Call to Action

This Canadian report, based on a national online panel survey, documents high levels of online gambling and gambling-related risk among young adults. It argues for improved surveillance, prevention and policy attention, while clearly describing limitations associated with online panel sampling.

Source: https://ccsa.ca/en/online-gambling-among-young-canadian-adults-call-action

The Lancet Public Health Commission on gambling

This major international synthesis frames gambling as a public health issue rather than solely an individual clinical problem. It reviews commercial and legal determinants of gambling harm and supports stronger controls on gambling products, availability and promotion.

Source: https://doi.org/10.1016/S2468-2667(24)00167-1

Further regulation is needed to safeguard population health in Canada's changing online gambling landscape

This Canadian analysis examines the recent expansion of online gambling, including the cross-jurisdictional nature of online gambling. It compares gambling regulation with Canada's public health-oriented cannabis legalization and considers advertising reform and other safeguards for population health.

Source: Manuscript submitted for publication

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