



May 10, 2023

AGCO iGaming Engagement Portal
Alcohol and Gaming Commission of Ontario
Submitted by e-mail to connect@agco.ca
Uploaded to: [Celebrity & Athlete Participation in igaming Advertising | Connect AGCO](#)

Re: Restricting Athlete and Celebrity Participation in Advertising for Internet Gaming

Thank you for the opportunity to respond to your consultation on restricting athlete and celebrity participation in advertising for internet gaming (igaming).

The Canadian Mental Health Association (CMHA) Ontario has 27 branches across the province that provide community-based clinical and social services to Ontarians living with mental health and addictions-related issues. We offer problem gambling and behavioural addictions supports, including community-based treatment for individuals concerned with and interested in making changes to their gambling, gaming, and internet/technology use. We appreciate the opportunity to offer our perspective and recommendations as a mental health and addictions treatment service provider.

We strongly urge you to prohibit all advertising for igaming due to the detrimental impact it has on youth, vulnerable individuals and their families. Youth and young adults are particularly vulnerable to at-risk gambling following exposure to advertisements. In Ontario, we're seeing an alarming increase among students in Grades 7 to 12 betting money on online gambling. Gambling-related harms such as financial loss, mental health issues, substance use, and suicide ideation, can have devastating and long-lasting impact on the individual and their family.

While we believe the AGCO's proposed changes to the Registrar's Standards restricting celebrity and athlete participation in promoting gambling is helpful, we encourage you to implement additional restrictions on advertising and marketing until all advertising for igaming is prohibited. Further to the changes you have proposed, we recommend additional measures to prevent gambling-related harms. We are outlining three key areas, and specific measures for action:

- Minimize the disproportionate impact of gambling-related harms on vulnerable communities
- Protect youth from advertising and promotion enticing them to gamble
- Protect all Ontarians by taking a public health approach to regulating and measuring the impact of igaming

Details and recommended actions are provided below for your consideration.

A. Minimize the disproportionate burden of gambling-related harms among vulnerable groups by including equity considerations in policies and program implementation.

The impacts of gambling-related harms are more severe among people who are facing mental health and/or economic challenges. People at increased risk of harm from gambling include, but are not limited to, older adults/seniors, people living on a low-income, people faced with mental health issues, and those with substance use dependencies. Mental health, substance use disorders and problem gambling have an additive and reciprocal relationship.¹ Findings from the 2018 Canadian

Community Health Survey (CCHS), show that even though people living on a low income are less likely to gamble, the risks associated with gambling are twice as high for them, revealing the disproportionately negative impact of gambling related harms to people with lower annual household incomes.

- ***Restrict igaming advertising and marketing by amending the Registrar’s Standards to prohibit advertising that:***
 - ***Use cartoon figures, symbols, role models, social media influencers, celebrities or entertainers.***
 - ***Encourage individuals to initiate igaming/ gambling involving money or increase the frequency of gambling on igaming platforms.***
 - ***Depict igaming as purely a recreational activity without harms such as the potential for significant financial loss.***
 - ***Portray igaming as an activity associated with success, wealth, knowledge, endurance, courage, or a sport.***
- ***Mandate igaming platforms to include financial and time-based limit-setting tools and require players to set limits when creating a player account.***

Online gambling can be done in isolation. Mandatory measures to help players set limits to prevent harmful gambling practices, including significant financial loss, do not exist and should be required by the Registrar’s Standards. Studies indicate that limit-setting tools are useful for creating awareness of the intensity of gambling and can support self-exclusion.^{2,3} Moreover, people who gamble online are unlikely to have or make connections to local resources to support those at-risk of problem gambling.
- ***Monitor and enforce operators and suppliers to cease delivering promotional material for gambling to customers who have deactivated their account or are “taking a break” from gambling.***

B. Protect youth and young adults (25 years of age or younger) from being induced to gamble.

The brain continues to develop until the age of 25, a period when adolescents and young adults are vulnerable and more likely to engage in higher risk behaviour, including gambling. Educating high school students and young adults on the harms of gambling should be prioritized. Youth and vulnerable adults “look up to” athletes and celebrities, who they also consider role models. As a mental health and addictions treatment provider, we are observing an increase in clients bringing forward the issue of celebrity endorsements for igaming. Ontario gambling data for 2021 highlights the concerning trend among students Grades 7 to 12 who are betting money on igaming. Surveys show that students self-reporting betting money on online gambling *increased significantly, from 4% in 2019 to 15 per cent in 2021.*⁴

Decisive regulatory action and community-based prevention and treatment services are required to reverse the alarming trend of betting money on online gambling among youth in Ontario. In addition to prohibiting the use of cartoon figures, symbols, role models, social media influencers, celebrities or entertainers who are reasonably expected to appeal to minors, we recommend amending the Registrar’s Standards to:

- ***Limit all igaming advertising to hours of the day when the likelihood of exposure to children is minimal.***

- **Require responsible gambling messages in igaming promotional material and other advertising media to be featured or displayed in a prominent manner:** on a scale and manner similar to the main feature of the gambling advertisement/promotion by ensuring the messaging on lower-risk gambling and potential harms of gambling are similar in speed, tone and volume, print size, and colour intensity and contrast.
- **Monitor and strictly regulate the activities undertaken by the gambling industry through its endeavour to attract the next generation gamblers - youth and children “Gen Z”:** Ensure that gambling is not “normalized,” and youth are not misled to believing igaming is without harm. Ensure that the harms of problem gambling, including its implicitly addictive nature, are prominently featured in all marketing and communications.

C. Minimize gambling-related harms for the whole population by taking a public health approach to regulating igaming

Igaming/online gambling is available on demand, 24/7, and therefore, does not support individuals who are actively trying to reduce gambling. Igaming provides access to multiple platforms for gambling, which reduces the effectiveness of limit setting features, and encourages continuous gambling. Evidence shows that increased exposure to continuous-play format gambling, specifically, internet gambling and electronic gaming machines, are linked to increases in problem gambling.^{5,6} Further, gambling is strongly associated with increased tobacco use, alcohol consumption, and use of other substances, including cannabis.⁷

- **Improve data collection on gambling trends across Ontario and in communities**
 - Partner with the community-based mental health and addictions sector and academia to conduct ongoing surveying to collect data on those who engage in igaming/online gambling including sociodemographic information, frequency of use and monetary impact.
 - Conduct a third party assessment of the impact of gambling using a public health and equity lens with attention to specific populations such as older adults/seniors, people living on a low-income, and people with co-morbidities and mental health challenges.
- **Limit the amount and frequency of igaming advertising, including sports betting advertising.** By normalizing gambling, online advertising has been linked with at-risk or problem gambling among youth (high school students). Online advertising and promotion increases the overall consumption of gambling among those who gamble. The promotion of igaming on different media formats, such as social media, increases the risk of gambling associated harms.
- **Enhance and scale-up family and caregiver support programs for people experiencing gambling harms, including counselling, in consultation with families impacted by harms from gambling and community-based service providers.** Harmful gambling impacts family, friends and the community. Partners, parents and children of a person with gambling problems experience financial insecurity, mental health issues, substance use, and female partners experience suicide ideation. Children of problem gamblers are more likely to experience mental health issues. Tools and resources for family members is integral to mitigating gambling-related risks and harms.

- **Promote the evidence-based [Lower-Risk Gambling Guidelines](#)** (2021) that help individuals learn how to lower the risks and harms associated with gambling. Individuals accessing igaming platforms should be required to review a statement on potential risks associated with igaming and guidance on lower-risk gambling as provided in the Guidelines.

Harmful gambling is often associated with complex mental health and social factors. This requires a comprehensive approach towards prevention, harm reduction and treatment. We are pleased to offer our support and expertise to create a safer igaming environment in Ontario.

Sincerely,



Camille Quenneville
Chief Executive Officer
Canadian Mental Health Association, Ontario

¹ Gambling Research Exchange Ontario. (2017). *Applying a public health perspective to gambling harm*. Accessed from <https://www.greo.ca/en/programs-services/resources/Applying-a-public-health-perspective-to-gambling-harm---October-2017.pdf>

² Lucar, C. Wiebe, J. and K. Philander. (2014). Monetary Limits Tools for Internet Gamblers: A Review of their Availability, Implementation and Effectiveness Online. Responsible Gambling Council.

³ Auer, M., Hopfgartner, N., & Griffiths, M. D. (2020). The effects of voluntary deposit limit-setting on longterm online gambling expenditure. *Cyberpsychology, Behavior, and Social Networking*, 23(2), 113-118.

⁴ Boak, A., Elton-Marshall, T., & Hamilton, H.A. (2022). The well-being of Ontario students: Findings from the 2021 Ontario Student Drug Use and Health Survey (OSDUHS). Toronto, Ontario: Centre for Addiction and Mental Health.

⁵ Williams, R. J., Leonard, C. A., Belanger, Y. D., Christensen, D. R., el-Guebaly, N., Hodgins, D. C. ... Stevens, R. M. G. (2021). Predictors of gambling and problem gambling in Canada. *Canadian Journal of Public Health*, 112(3), 521-529.

⁶ Allami, Y., Hodgins, D. C., Young, M., Brunelle, N., Currie, S., Dufour, M., Flores-Pajot, M.-C., and Nadeau, L. (2021) A meta-analysis of problem gambling risk factors in the general adult population. *Addiction*, 116: 2968– 2977.

⁷ Gambling Research Exchange Ontario (GREO). (2023). Gambling, Substance Misuse, and Addiction. Access at <https://www.greo.ca/en/greo-resource/gambling-substance-misuse-and-addiction.aspx>