



GAMBLING ADVERTISING COMPLAINTS

**A THREE-YEAR REVIEW
April 2022 to April 2025**

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Introduction

On April 4, 2022, Ontario launched an iGaming market. To support this market and encourage responsible gambling, the Alcohol and Gaming Commission of Ontario (AGCO) established a regulatory framework, including a set of standards for operators of internet gaming sites, with their advertising as one area of focus. Layered on top of the regulatory requirements for iGaming operators in respect of advertising, and as with all advertising to Canadians, gambling ads must comply with the **Canadian Code of Advertising Standards** (*Code*).

The *Code* is administered by Ad Standards, the national self-regulatory body for advertising in Canada, whose mandate is to ensure that advertising is truthful, fair and accurate. The *Code* establishes the criteria for acceptable advertising and forms the basis upon which advertising is evaluated in response to consumer complaints and complaints between advertisers.

At Ad Standards, we recognize that an effective consumer response mechanism is essential to maintaining public confidence in advertising. Through the Consumer Complaint Procedure, Ad Standards reviews all consumer complaints that it receives under the *Code*.

The consumer complaints provide valuable insight into how gambling ads are perceived by Canadians, and this report is intended to provide industry with an overview of the number and nature of these complaints since the launch of iGaming in Ontario in April 2022 through to April 2025.

Complaints relating to gambling advertisements tend to fall under the following provisions of the *Code*:

Clause 1 (Accuracy and Clarity):

This clause involves advertisements that include inaccurate claims or convey a misleading impression, omit relevant information, or are unclear about the conditions associated with a promotional offer.

Clause 13 (Advertising to Minors):

This clause deals with products prohibited from sale to minors that are advertised in such a way as to appeal particularly to persons under the legal age.

Clause 10 (Safety):

This clause prohibits depictions in advertising that are reasonably interpreted as encouraging unsafe behaviour.

Clause 14 (Unacceptable Depictions and Portrayals):

This clause relates to concerns about distasteful and offensive advertising.



Consumer Complaints (By the Numbers)

a. Overview

Consistent since April 2022, complaints about gambling advertising represent around 10% of the total of annual complaints received by Ad Standards, with 130 complaints received in year one, 113 complaints received in year two and 67 complaints received in year three.

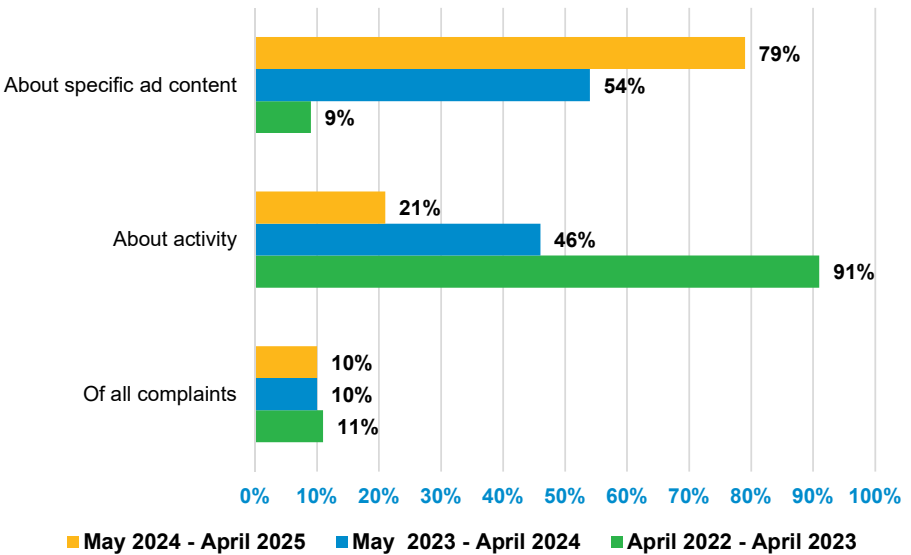
In year one (April 2022 – April 2023), the majority of complaints (91%) objected to the advertising of gambling generally, rather than the content of specific advertisements. The complainants were redirected to their provincial gaming regulator given that Ad Standards does not review complaints related to the category of gambling advertising regardless of its content as further explained below.

In January 2024, Ad Standards launched a new online complaint submission form that includes pre-screening questions. These questions are intended to clarify Ad Standards’ mandate under the *Code* and redirect complainants to the appropriate agency for concerns that cannot be accepted for review under the *Code*. Since the implementation of these pre-screening questions, we are pleased to see a considerable shift in the complaints received. The percentage of complainants concerned about the content of specific gambling advertisements was 54% in year two (May 2023 – April 2024) and 79% in year three (May 2024 – April 2025)—a significant change from only nine percent in year one. An increased number of consumers appear to understand that if they are concerned about the content of a specific ad, they can submit their complaint to Ad Standards.

While the reduction in the number of complaints received from May 2024 to April 2025 may have resulted from our efforts to clarify our mandate with this pre-screening tool, we suspect that technical issues

experienced with the launch of our new online complaint form also triggered a decline in numbers of complaints received.

Complaints Received Between April 2022 - April 2025



b. By Province

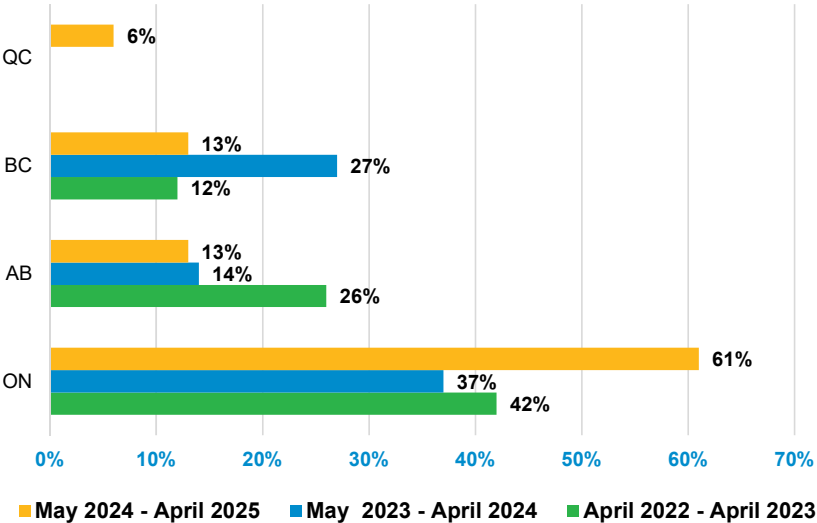
The majority of complaints received were from residents of Ontario, representing 42% and 37% of all gambling complaints received between April 2022 and April 2024. This number increased significantly between May 2024 and April 2025, with 61% of gambling complaints coming from Ontarians.

Complaints received from residents of Alberta decreased from 26% in 2022-23 to 14% the following year (2023-24) and 13% this past year (2024-25).

Residents from British Columbia comprised 12% and 13% of gambling complainants in the first year (2022-2023) and third year (2024-2025) of our tracking, respectively. We did note an increase in complaints received from B.C. residents during the second year (2023 –2024) of tracking, with 27% of gambling complaints submitted by residents of B.C.

For the first time this past year (2024-2025), Ad Standards received complaints from residents of the province of Quebec, which represented six percent of the gambling complaints received.

**Complaints Received Between April 2022 - April 2025
By Province**

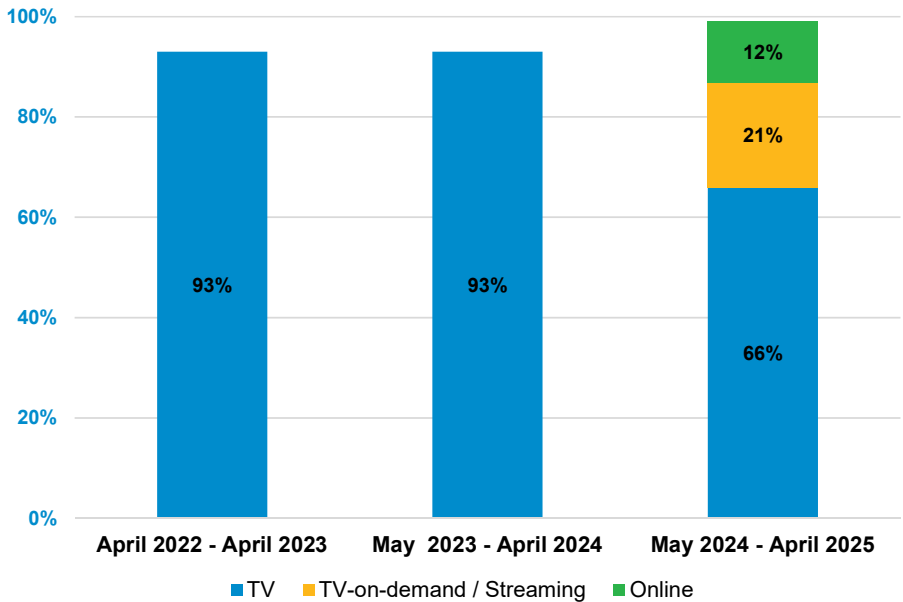


c. By Media

During the first two years that Ad Standards tracked these complaints, 93% of complaints received were about gambling advertising that appeared on television.

However, this past year we noted a shift in the trend. Between May 2024 and April 2025, 66% of gambling complaints were about ads seen on television, 21% of complaints were about gambling ads appearing on TV-on-demand or streaming platforms, and 12% were about online ads (mostly about gambling ads appearing on advertisers’ websites and social media platforms).

**Complaints Received Between April 2022 - April 2025
By Media**



Concerns Raised in the Complaints Accepted Under the Code

a. By Clause

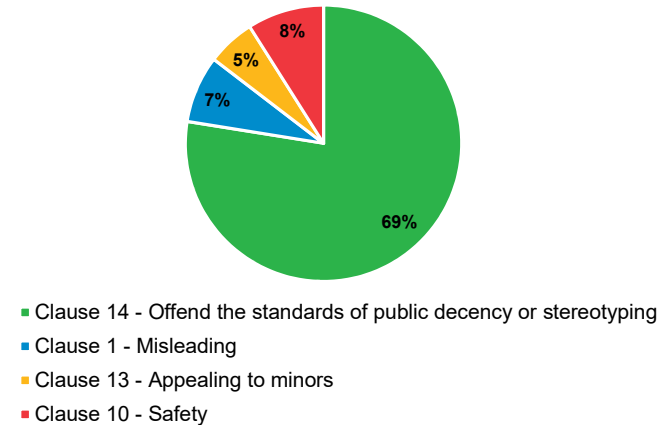
As indicated in the [Overview](#), in our first year of tracking, the vast majority (91%) of complaints received about gambling advertising related to the advertising of gambling generally rather than the content of specific ads. Details about the concerns raised in these complaints are included in [Concerns Raised About the Advertising of Gambling Generally](#). The *Code* related complaints in that first year were not significant enough to include in our summary below.

Between May 2023 and April 2025, the majority of complainants were concerned about depictions in gambling advertising that they believed offended the standards of public decency or that were stereotyping in nature. These concerns related to ads that consumers found distasteful or offensive increased from 69% in 2023-24 to 83% in 2024-25.

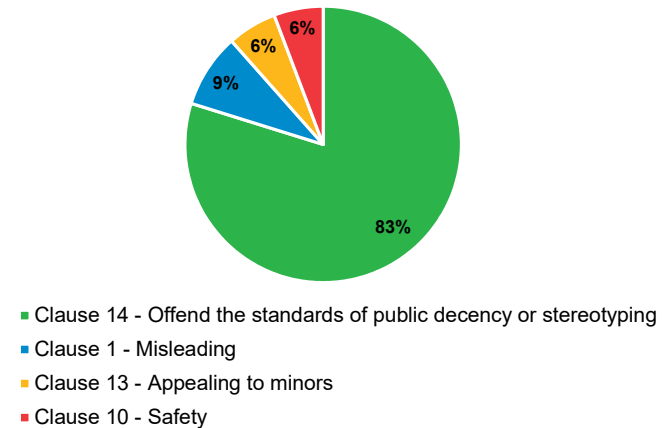
Others *Code* clauses that were often raised in complaints about gambling advertising remained stable in the second and third year of tracking.

- 7-9% of complainants were concerned about gambling ads that may potentially be misleading or deceptive under Clause 1 (Accuracy and Clarity);
- 5-6% of complainants were concerned about gambling ads that may potentially be appealing to minors under Clause 13 (Advertising to Minors);
- 6-8% of complainants were concerned about gambling ads that may potentially be unsafe under Clause 10 (Safety).

Clauses Raised Under Complaints May 2023 - April 2024



Clauses Raised Under Complaints May 2024 - April 2025



b. Findings: Complaints That Raised Potential Code Issues

Between May 2023 and April 2025, Ad Standards identified a potential issue under one or more clauses of the *Code* with 65 complaints concerning six advertising campaigns. Out of these 65 complaints, eight complaints related to two ads were forwarded to the Standards Council for a formal adjudication under Clause 10 (Safety) and Clause 14 (Unacceptable Depictions and Portrayals), specifically 14(d) that deals with depictions that offend the standards of public decency.

The complainants were concerned about the metaphor used in one ad, alleging that it promoted gambling as a solution to mental health and depression.

Complainants of the other ad alleged that it was highly inappropriate for television during any time slot, especially for young viewers, due to its suggestive nature. These complainants felt the advertisement crossed the line of acceptability; they felt the ad was in very poor taste, as well as crude and offensive. The Standards Council



determined, by majority vote, that these two ads did not contravene the relevant provisions of the *Code*. They determined that one of the ads referred to boredom, not mental health and depression. The other, while provocative by design, required a slightly sophisticated level of maturity to understand the double-entendre found offensive by the public.

Out of these 65 complaints, 52 complaints that raised potential issues under Clause 14 were closed without a formal adjudication by Standards Council because the complainants did not request one.

Under the Consumer Complaint Procedure, when an accepted complaint relates to the provisions of Clause 14, the advertiser's response to the complaint is forwarded verbatim to the complainant. The complaint proceeds to the Standards Council for deliberation only if the complainant notifies Ad Standards that they remain dissatisfied with the advertiser's response.

Finally, one complaint was resolved administratively by Ad Standards because the advertiser corrected the erroneous advertisement upon receipt of the complaint and published a correction notice alerting consumers of the inadvertent error. In this case, the complainant noted that the conditions associated with the advertised offer were disclosed only after someone signed up for the introductory offer. The Consumer Complaint Procedure provides Ad Standards with the ability to resolve complaints involving Clause 1 (Accuracy and Clarity) and Clause 3 (Price Claims) without a formal adjudication by the Standards Council. This applies specifically to non-complicated cases that typically involve pricing errors or omission of relevant terms and conditions associated with promotional offers, provided certain conditions are met by the advertiser.

Concerns Raised About the Advertising of Gambling Generally

a. A 2022-23 Overview

Finally, we wish to share our insights about the complaints related to gambling advertising despite being complaints that Ad Standards could not accept for review under the *Code*, as we believe the information may be relevant to industry.

Ad Standards responded to every single complaint that it received. Each complainant whose complaint fell outside of the scope of the *Code* was directed to contact the AGCO or the regulator in their province of residence on these matters.

In 2022-23, the majority of complaints (81%) objected to the high volume and frequency of sports betting ads on television, with more than half of complaints (57%) calling for heavier restrictions on audience due to the well-known risk of addiction associated with gambling. Some of them felt that the inclusion of a disclaimer alerting viewers to ‘play responsibly’ was insufficient due to the high volume and frequency of these ads, which they believe undermine responsible behaviour. A third of the complaints (36%) objected to the scheduling of gambling ads during sports events, mainly sports games often viewed by families, including minors. One-fifth of complainants (22%) were concerned about the format used to deliver some of these ads and did not appreciate the placement of in-program sponsored content by sportscasters embedded within organic commentaries during game broadcasts. A minority of complainants (12%), residing outside of Ontario, questioned the legalities surrounding sports betting advertising since the activity is only legal in Ontario, but is broadcast nationwide.



b. A Year-by-year Comparison (May 2023 – April 2025)

In 2023-24, complaints about the advertising of gambling generally represented 46% of gambling complaints. They decreased to 21% between May 2024 and April 2025.

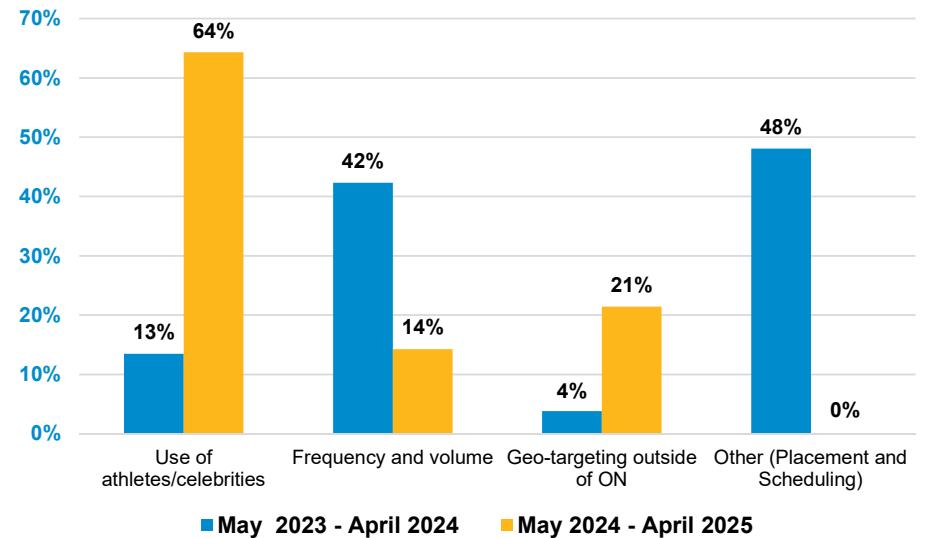
A year-by-year comparison during that timeframe shows a significant increase of concerns related to the use of athletes and celebrities in gambling advertising. Some complainants felt that celebrities and athletes should not be featured in gambling advertising. The majority of complainants are under the impression that the **revised rules** implemented by the AGCO on February 28, 2024 prohibit celebrities and athletes from being featured in gambling advertising. In fact, the regulatory framework now restricts the use of celebrities who would likely be expected to appeal to minors and restricts the use of athletes in advertising and marketing in Ontario, except for the exclusive purpose of advocating for responsible gambling practices.

We note a decrease of complaints received about the frequency and volume of gambling advertising from 42% to 14% over that two-year period.

However, complainants are still concerned about geo-targeting of gambling advertising with an increase from four percent to 21%. These consumers are concerned about sports betting ads broadcast outside of the province of Ontario even if the ads disclosed that the product or service advertised is only available in Ontario.

While Ad Standards received numerous complaints about placement and scheduling of gambling advertising in 2023-2024, once Ad Standards' new complaints portal launched with questions developed to pre-screen complaints, these complaints were no longer being submitted for consideration in 2024-2025.

Types of Complaints (Year-by-year comparison)



Conclusion

Ad Standards is pleased to report that advertising about gambling products challenged through consumer complaints were found to be compliant with the provisions of the *Code* by Standards Council. We are also pleased to report that the majority of advertisers involved in these complaints willingly cooperated with the self-regulatory consumer complaint process.

Through these complaints, we note that consumers are increasingly concerned about the use of athletes or celebrities in gambling advertising, even if most of these advertisements advocate for responsible gambling practices.

We strongly encourage advertisers engaged in gambling advertising to consider subjective concerns about depictions that may offend the public. Canadians are sensitive to stereotyping depictions and scenarios that offend the standards of public decency and may dissociate themselves from a brand that does not meet the standards of acceptable advertising.

About Standards Council

The Standards Council plays a vital role in ensuring objective and fair complaint adjudication. While Ad Standards' staff administer the process by which consumers submit their written complaints about advertisements, it is the complaints that raise potential issues under the *Code* that are reviewed and adjudicated by Standards Council. Each Standards Council complaint adjudication includes senior industry and public representatives from across Canada who volunteer their time to help ensure that Canadian advertising is truthful, fair and accurate.

The **current members of Standards Council** are posted on Ad Standards' website.



About Ad Standards

Ad Standards is the only national not-for-profit advertising self-regulatory organization in Canada. Through member support and cooperative industry initiatives, we build public confidence in advertising by helping ensure ads, in all media, are truthful, fair and accurate.

We administer the *Canadian Code of Advertising Standards*, which sets criteria for acceptable advertising, and provides a mechanism for adjudicating and resolving consumer complaints and competitive disputes. We also review advertising creative and offer consultative services to help ensure compliance with relevant laws, regulatory guidelines and industry codes.

Our collaborative relationships with Canadian regulators and global self-regulatory organizations provide a diversity of valuable insights, which inform our initiatives and goals.



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