



GOVERNMENT OF ONTARIO SPRING 2022 BUDGET CONSULTATION

**Submission to the Standing Committee on Finance and
Economic Affairs**

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Responsible Gambling Council Ontario

The Responsible Gambling Council (RGC) is an independent non-profit organization dedicated to problem gambling prevention.

For over 35 years, RGC has worked to reduce gambling risk by creating and delivering innovative awareness and information programs in Ontario and beyond. We promote the adoption of improved play safeguards through best practices research, standards development and the RG Check accreditation program.

RGC is committed to bringing together all sides (operators, regulators, treatment and community agencies) to ensure sustainable gambling spaces are in place and to help those at risk because we believe gambling should never come at a human cost.

RGC. All in for Safer Gambling
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EXPANSION OF ONLINE GAMBLING REGULATION

In November 2020, the Province of Ontario announced plans to proceed with the expansion of online gambling regulation. The Responsible Gambling Council (RGC) believes it is important that consumer choice is expanded in a way that will also ensure public safety and responsible play for those who use these websites. RGC has been involved in discussions with the Ministries of Finance, Attorney General and Health, since August 2019, regarding the importance of robust consumer education and platform safeguards to accompany the expansion.

RGC is pleased to participate in the 2022 Ontario Pre-Budget consultations.

REQUEST

RGC respectfully requests \$3.5 million, in one-time funding, to develop and implement a multi-pronged and proactive public education campaign that highlights the importance of responsible play and helps create a culture of responsible gambling in Ontario. This campaign will help balance the online gambling and sports betting promotional advertising that is expected to coincide with the expansion of the regulated market, and help to create a culture of responsible play.

The need is immediate.

In recent months, as iGaming and sports betting operators prepare to enter the regulated market, there has been a dramatic increase in marketing and advertising targeted at Ontario consumers. This rapid rise in advertising increases the risk of problematic play with current grey-market operators; and ultimately undermines the government's commitment to responsible gambling. Operators are highly motivated to enter the Ontario market due to its strong revenue potential. The competition for market share will be fierce, and we can expect there will be operators from jurisdictions where responsible gambling and advertising regulations are weak.

Ontario is considered a leader in responsible gambling through the robust standards established by the Alcohol and Gaming Commission of Ontario (AGCO), and the collaborative partnership between the operators, AGCO, Ontario Lottery and Gaming (OLG), the Province, and the Responsible Gambling Council (RGC). Together we have created a responsible gambling culture to ensure that safeguards are in place at venues and on PlayOLG.ca to prevent harms to individuals, families and communities.

With Ontario expanding online gambling and single event sports betting legalized, it is imperative that there is an increase in relevant and impactful public education programming to inform vulnerable populations in Ontario about responsible gambling practices and tools. While we have seen firsthand the

successes of responsible gambling initiatives, it is still estimated that approximately 2.2-2.5% of adults in Ontario¹ — approximately 200,000 people — have a moderate to high gambling problem.

ONLINE GAMBLING AND COVID-19

The evidence is clear.

Prevalence studies from Ontario and around the world consistently indicate that online players are more likely to experience gambling problems than the general gambling population (all forms) and those who play on land exclusively. In Ontario, 13.5% of those with gambling problems have played online in the past year². The fact that online gambling can be accessed 24/7, is easily accessible on mobile devices, computers, laptops, and tablets, and can be an isolating activity, increases the potential for risk.

In March 2020, the Province of Ontario, under the recommendation of the Chief Medical Officer, implemented a variety of measures to manage the spread of COVID-19. For over 20 months, many jurisdictions — the world over — reported increases in online gambling activity. In order to understand the impact of the pandemic on gambling behaviours, mental health, substance use and online behavioural risk factors in Ontario, RGC's Centre for the Advancement of Best Practices (CABP) developed and implemented a longitudinal study between April to December 2020 to explore Gambling during COVID-19 in Ontario. Key findings from the study were:

- Online gambling participation increased steadily over time among those who primarily gambled in-person before COVID-19, up to 80% in December.
- Half of online gamblers started to play because they saw ads and because they wanted promotions.
- Participation in most online gambling games increased in each wave.
- COVID-19 social distancing measures increasingly influenced the decision to gamble online between August and December.
- New online accounts increased 20% between March and August.
- PlayOLG represented 2/3 of online gambling activities in Ontario.
- Almost 1/4 of gamblers do not set a budget.
- Over 1/4 have gambled while anxious or depressed in the past year.
- Over 1/3 of gamblers were playing to earn income in December.
- Between August and December, time and money spent gambling online as well as intoxicated gambling fluctuated by up to 50% (i.e., increases and decreases).
- Cannabis and alcohol intoxicated gambling increased in later waves.
- The prevalence of moderate risk and high-risk gambling was greater among online gamblers in each wave.

¹ Williams, R.J. & Volberg, R.A. (2013) Gambling and Problem Gambling in Ontario. Report prepared for the Ontario Problem Gambling Research Centre and Ontario Ministry of Health and Long Term Care. June 17, 2013. <http://hdl.handle.net/10133/3378>

² Williams and Volberg (2013). Gambling and Problem Gambling in Ontario. Ontario Problem Gambling Research Centre & the Ontario Ministry of Health and Long-Term Care. Retrieved from: <https://opus.uleth.ca/handle/o1033/3378>

As the Province moves forward with the expansion of legal online gambling, it will be important to take into consideration the impacts that COVID-19 has had on online gambling and the people of Ontario. The implementation of prevention safeguards will be critical to a safer and sustainable online gambling industry.

Investing in prevention will both promote responsible gambling, and send a clear message to Ontarians that this government is committed to being a leader in responsible gambling. Evidence consistently demonstrates that investing in prevention programs makes sound financial sense, and that promoting health and well-being results in lower costs to government in areas such as health care, including mental health and addictions services, job loss, social assistance, and correctional services.

RGC lauds the government's commitment to consumer protection. For the past two years, RGC has worked closely with the Ministry of Finance, Ministry of the Attorney General, the Ministry of Health, Alcohol and Gaming Commission and more recently, iGaming Ontario to establish robust responsible gambling standards and practices to prevent gambling harms and promote a sustainable industry. The Ministry of Finance and the Attorney General support our recommendation and request for funding to establish an online gambling public education campaign.

PUBLIC EDUCATION

The public education campaign would leverage paid media channels to promote broad-based risk prevention messages for the general population as well as customized messages that address the unique risks to select priority populations such as young adults, South Asian and Chinese populations. Through a series of advertisements, the campaign would aim to increase awareness of the risks associated with online gambling and the importance of playing on regulated sites that have responsible gambling features built in to the platform. Leveraging a variety of media channels, we would encourage practices such as limiting alcohol and substance use while gambling; refraining from gambling if anxious or depressed, setting and sticking to budget limits and using the platform tools to help manage play. To ensure that our message balances out the promotional messages being shared by new gambling operators, our strategy would leverage media channels relevant to our target demographic and commonly used by gambling operators: TV as well as social and digital channels. It is estimated that with a media budget of \$2,000,000 we would be able to reach over 90% of the population 18+ through TV/Video advertising.

Priority populations for this campaign include:

- Men and women across Ontario who engage in some form of gambling (online, sports, land-based, horse racing, lottery) with a focus on ages 19-35 (English and French)
- South Asian and East Asian populations, ages 25+
- Indigenous populations, ages 19+

The research confirms that education and information programs are vital in helping individuals to make informed decisions about gambling and effectively prevent problem gambling. Programs specifically tailored for high priority populations like young adults and ethno-cultural populations using the right message, communication channels and approaches prove to be most effective in developing healthy

attitudes and behaviours towards gambling and gaming. Upon completion of the campaign, RGC would provide a comprehensive evaluation to the Ministry of Health.

As longstanding partners with the province in both land-based and online gambling spaces, RGC is committed to working with you, and the other project stakeholders on the planning for the expansion of the legal, regulated market. Ontario has always been a leader in gambling regulation within Canada and internationally, and we are eager to see Ontario's leadership continue.

