



Protect Albertans from Online Gambling

Alberta should not follow Ontario's lead on enabling more online sports gambling. Any anticipated gain in terms of revenue is not worth the broader social and economic costs.

Minister Nally [acknowledged](#), when debating Bill 48, that "Gambling will never be safe." However, he also reasoned that "there are ways to make it safer," through Bill 48. The Minister noted that the bill isn't a cash grab, and that the government is not looking to create new gamblers. The problem is that, even if the government can succeed in making gambling safer on a per-bet or per-gambler basis, if the result is to vastly increase the amount of online gambling, the net result could still be to increase total gambling-related harm in society. Available evidence strongly suggests this is the regrettable outcome of Ontario's policy changes, which Bill 48 mirrors.

ARPA Canada recognizes the complexity surrounding the issue of gambling. Only regulated sites are permitted, but unregulated sites continue to operate, and enforcement is challenging. However, an approach that says, 'gambling on unregulated private sites is happening anyway, so why not regulate it to make it safer?' is a false dichotomy. Alberta could, instead, follow Manitoba's lead in trying to suppress the use of unregulated online gambling sites.

It is difficult to know the quantity and societal impact of gambling on unregulated sites. But regulating online gambling in the way Bill 48 proposes could open the floodgates to new platforms that enjoy tacit government endorsement. Such a system would imply that certain gambling sites are 'safe,' when in reality gambling is not safe. Of course, online gambling already exists in Alberta through Play Alberta, indicating existing provincial approval of the practice. But expanding the gambling market allows far more visibility and accessibility to gambling websites. Instead, Alberta could strictly limit online gambling (through Play Alberta) and target sites that are not permitted to operate in the province.

Why would private gambling companies want to be regulated if they will not attract more gamblers as a result? Agreeing to become regulated would mean giving up a portion of their revenue to the province. It seems plausible to assume that these companies wish to be regulated because they recognize the financial benefits of being able to legally promote their gambling apps and websites.

Canadian provinces have approached the issue of gambling in different ways, but only Ontario permits private companies to conduct online sports betting. Although Ontario earns revenue from this arrangement and its regulations may curb some of the worst online gambling practices, the harms of online gambling in Ontario outweigh the benefits.

Alberta MLAs should therefore not support Bill 48. Alternatively, at the very least, they should insist that Bill 48 be amended to include a ban or major restrictions on advertising for online gambling, which has become ubiquitous in Ontario.

The Harms of Gambling

Gambling has been shown to [lead](#) to addiction, suicidality, poverty, relationship breakdown, family violence, neglect of children, and crime. Gambling is also commonly used by criminal organizations for money laundering. One [study](#) found that, globally, 5.5% of women and 11.9% of men engage in risky gambling. The authors also estimate that over 15% of adults who gamble online and 8.9% of adults who engage in sports betting may have a gambling disorder.

A 2022 [study](#) by Statistics Canada (using data from 2018) found that 64.5% of Canadians over the age of 15 reported gambling in the past year. Of these, 304,400 were at a moderate-to-severe risk of problems related to gambling. Although people from lower-income households were less likely to gamble, they were also more susceptible to gambling problems. People who gamble more than 1% of their income [are](#) 4.3 times more likely to experience financial harm, 4.7 times as likely to experience relational harm, 3.9 times as likely to experience psychological harm, and 4.6 times as likely to experience other related health problems than those who gamble less than 0.1%.

In another [study](#) that considered 57 different risk factors, the players most at risk of problem gambling were those who gambled online. One American [study](#) found that after sports betting was permitted and 38 states implemented it between 2017 and 2024, there were 23% more searches nationally for help for gambling addiction, an increase which appeared to correspond to the growth in online sports betting.

Online gambling is particularly addictive and increasingly accessible. As explained in a recent [report](#) focused on sports betting, one factor is in-play betting. These kinds of bets have changed online gambling from a game like the lottery to a game more like a slot machine, where you can place bets throughout the game. Through online gambling, people can place bets at any time, from anywhere. When bets can be resolved almost immediately, such as with in-game sports betting, users are more likely to place more bets. Online gambling also gives people the ability to game alone and to use credit card payments for easy payment.

Young people may be particularly susceptible to the effects of gambling and its promotion. The Canadian Mental Health Association notes that students who self-report betting online increased from 4% in 2019 to 15% in 2021. One [study](#) found that, globally, nearly 18% of adolescents had gambled in some form in the previous year, 10.3% of whom had gambled online. The authors also note that 26.4% of adolescents who gamble online and 16.3% of adolescents who engage in sports betting may be affected by gambling disorder.

Gambling Revenue

Alberta already has a gambling problem. In 2024, net [revenue](#) for commercial gambling in Canada was over \$17 billion. Net revenue is revenue after deducting prizes and winnings, meaning that net revenue also represents the net loss to all gamblers. Alberta is already second-highest in net gambling revenue *per adult resident* (not per gambler) at \$666 per adult (Saskatchewan is first at \$827).

Alberta generated nearly \$235 million in net revenue from online gambling in 2024. This does not include revenue from unregulated gambling sites, which would inflate the consumer loss from gambling even higher. Though it's difficult to estimate how much gambling happens on unregulated sites, Albertans may actually be losing over \$700 per year per adult (including non-gamblers) on gambling.

Nationally, in 2024, net revenue for *online* gambling alone totalled over \$3.5 billion of the \$17 billion. That's roughly a fifth of total net revenue for commercial gambling in Canada, even though online gambling is quite new. Of this \$3.5 billion, nearly \$3 billion came from Ontario. Since Ontario opened the

online gambling market to private providers in 2022, online gambling revenue jumped from less than \$500 million to nearly \$3 billion in 2024. Ontario's gambling revenue as a whole has [grown](#) from \$5.7 billion in 2020 to over \$8.5 billion in 2024.

Ontario's Experience

Ontarians wagered an [estimated](#) \$77.6 billion online in 2024, a 31% increase from 2023 (\$59.3 billion) and well above the \$21.6 billion wagered over nine recorded months in 2022. Online gambling from private providers generated revenues (all wagers, minus winnings, and not including other costs) of \$2.98 billion in 2024, an increase of more than 31% over the previous year. Ontario's online gaming industry [had](#) 1.1 million active player accounts in February 2025. The Ontario government collects 20% of iGaming's revenue, amounting to an [estimated](#) \$174 million last year.

iGaming Ontario [reports](#) that 86% of gamblers in Ontario play on regulated sites. However, in a rapidly growing market, it's difficult to know how many new people have been lured to gambling through its recent growth and ubiquitous promotion, and how many were already gambling on unregulated sites and switched to regulated ones. iGaming Ontario [touts](#) that it has become the most competitive gaming market in North America and is 6th in the world in gross gaming revenue.

And revenue growth is not the full story. The *average* iGaming Ontario account [spent](#) between \$232 and \$320 per month during the 2024 fiscal year, which is well above 1% of income for most participants (\$232/month is 1% of \$278,400/year income). This indicates that many Ontarians are at a high risk of harm from their gambling habits. Additionally, Ontario's regulated market seems to have negatively affected problem gambling. In 2021, 21% of callers to Ontario's Problem Gambling Helpline were [experiencing](#) problems related to gambling online. In 2023, that increased to 63%.

It's clear that permitting and regulating online gambling generates revenue for both private gambling companies and government. But what about the social and economic costs?

Gambling Promotion

Advertising has proven effective in attracting more players and getting them to bet more. But it is also [associated](#) with more frequent and riskier gambling. Ontario recognized this problem in part when it [banned](#) using athletes, celebrities, social media influencers, and others who would "likely be expected to appeal to minors" in online gambling commercials – unless, that is, the celebrity in the ad reminds you to gamble responsibly. So it's really not a ban at all.

The Canadian Mental Health Association [recommends](#) banning all advertising for online gambling because of the negative impact it has on vulnerable people and their families. The Association says more of its clients seeking help for problem gambling are mentioning celebrity endorsements for online gambling. The connection between advertising and behaviour is why advertising for alcohol, cannabis, and tobacco are strictly regulated. For example, an advertisement for an alcoholic beverage may not show a person drinking it, and tobacco advertising is entirely prohibited.

But advertising for sports betting and online gambling in Canada is very permissive. One analysis [estimated](#) that Canadian viewers of a live sports broadcast were exposed to 2.8 references to sports betting every minute and that over 20% of viewing time included some form of gambling reference.

Other Jurisdictions

In contrast, the United Kingdom and Ireland have ‘whistle-to-whistle’ bans, prohibiting gambling ads from five minutes before the game until five minutes after the game. British regulators have proposed banning gambling promotion on jerseys as well. Recent [research](#) in the U.K. found that sports betting has become a normalized part of sports, and that sports betting involves a variety of gambling-related harms.

Given the risks of online gambling, Australia has [banned](#) all online in-play betting on live sports events, as well as online slot machines and casino games. Other jurisdictions, including multiple Western European countries, have [introduced](#) strict regulations around gambling advertising. Some, like Italy, have banned ads entirely.

Two Canadian provinces have tried to [combat](#) illegal gambling sites through the courts. While Quebec’s attempt to block access to illegal sites failed, Manitoba recently filed an injunction against a well-known illegal gambling site, arguing that they are operating illegally, without provincial authorization. However, the law is not settled on whether provinces can have unregulated sites shut down.

Recommendations

1. *Do Not Legalize Private Online Gambling*

Gambling in Alberta has [grown](#) rapidly as more gambling venues and options become available. The growth of gambling has made it more visible and has increased the options for gamblers, as the province has moved from land-based casinos and Video Lottery Terminals (VLTs) to online gambling and single-game sports betting. Opening the gambling market to private companies will only increase the availability and visibility of online gambling. This is particularly concerning for problem gamblers and for low-income Albertans.

Current responsible gambling measures are [inadequate](#) for preventing harm. These tools place the onus of avoiding harm on individuals who may already be struggling with addiction. Some researchers argue that such tools are ineffective or even counterproductive - giving a false sense of safety.

2. *Prohibit Advertising of Gambling*

Should Alberta choose to move ahead with creating the Alberta iGaming Corporation, the province should prohibit all gambling advertising. Advertising normalizes gambling, influences young people to start gambling, and can trigger people struggling with compulsive or addictive gambling.

3. *Take a Preventative, not Promotional, Approach to Gambling*

Rather than effectively licensing and regulating private companies, Alberta can seek to minimize problematic features of existing gambling in the province. The Centre for Addiction and Mental Health’s policy [framework](#) lists many of these options. The government can take a public health approach. Gambling can be limited, for example, through restricting VLTs. Notably, Ontario has banned VLTs. But Alberta [has](#) the third highest number of VLTs in the second highest number of venues across the country. Yet VLTs and EGMs are [among](#) the most addictive forms of gambling due to their accessibility, lack of spending limits, and characteristics that allow the user to speed up the rate of play, or think they are close to winning. Protective measures could minimize some of these problematic features or implement other safeguards such as limits on money spent, built-in breaks in play, and better self-exclusion options.

We would welcome the opportunity to discuss this further or to provide any additional information.

Respectfully submitted on behalf of ARPA Canada,



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