



Dear Mr. Wilson:

On behalf of the Canadian Football League (CFL), I want to express my gratitude to the Standing Senate Committee on Transport and Communications for its invitation to participate in its examination of Bill S-269, the National Framework on Advertising for Sports Betting Act.

Unfortunately, the committee's hearings coincide with the kickoff of our league's regular season, which requires me to attend several games across the country to meet with our clubs, their partners, and our fans. It is one of our busiest times of the year, along with Grey Cup, of course. My apologies for not being able to participate in person.

However, given the importance of this issue and our respect for your role, I am sharing this written submission on behalf of the CFL with you. I trust you will find it helpful in your work.

Thank you for your attention to this important matter, your contributions to the legislative process, and your service to Canada.

Yours in football,

A handwritten signature in black ink that reads "Randy Ambrosie". The signature is stylized with a large, sweeping initial "R".

Randy Ambrosie
Commissioner
Canadian Football League





To: Standing Senate Committee on Transport and Communications
From: Randy Ambrosie, Commissioner, on behalf of the Canadian Football League
Regarding: Submission on review of Bill S-269, the National Framework on Advertising for Sports Betting Act.

On behalf of the Canadian Football League (CFL), I want to thank the Committee for its work on this issue and I express our respect for the important role its members play in Canada's legislative process.

Thank you as well for your invitation to participate in the Committee's review of Bill S-269, the National Framework on Advertising for Sports Betting Act.

I regret not being able to participate in person. Unfortunately, your hearings coincide with the kickoff of our regular season, which requires the Commissioner to attend several games across the country to meet with our clubs, their partners, and their fans.

However, I do humbly submit this written submission, for your consideration.

Executive Summary

While Bill S-269 may be well-intentioned, we do not agree a national framework is required to regulate the advertising of sports betting in Canada.

As Bill C-218 has evolved, we and other professional sports leagues have taken extensive steps to protect the integrity of our sport and to ensure a safe betting environment for fans who want to wager on our games.

These include:

- Working with sportsbooks, and the Responsible Gambling Council of Canada, to develop and promote awareness of responsible gaming, and to provide tools and resources to help bettors;
- Developing our fulsome Match Manipulation Policy;
- Implementing mandatory education for all CFL personnel, including players and coaches;
- Developing partnerships with agencies that specialize in monitoring wagering activity to ensure fair competition;
- Requiring third parties to fully partner with the CFL and its responsible gaming initiatives, in exchange for the use of our football data and trademarks;





- Regulation of sports wagering advertising on league-controlled channels, such as broadcast-visible signage on the field, to limit how often and how prominently a sportsbook's digital logo is featured during a CFL game.

Please allow me to provide some broader context and additional detail in the sections that follow.

Integrity & Fair Competition

- It is the duty of the CFL and its partners to understand the potential risks to integrity associated with gambling. Since its legalization, the league has taken measures to properly educate all full and part-time CFL personnel, including players, regarding their role and responsibilities in upholding the highest ethical standard. All personnel must complete training regarding the CFL Match Manipulation Policy on an annual basis and are prohibited from betting on CFL activities.
- The CFL has partnered with Genius Sports, the International Betting Integrity Agency, and the International Olympic Committee's Integrity Betting Intelligence System to monitor sports wagering activities to ensure that competition remains fair.

Responsible Gaming

- We believe wagering should only be done legally and by adults of legal age who have the means to engage in such activities.
- The CFL is dedicated to working with strategic partners, such as the [Responsible Gambling Council of Canada](#), to raise awareness for responsible forms of gambling. The league is committed to providing CFL fans with clear information to guide responsible gambling, to understand the risks of sports wagering, and to identify potentially problematic behaviours associated with gambling.
- The CFL does not believe in or support irresponsible sports wagering of any kind.

Authorized Gaming Operator (AGO) Model

- The CFL has instituted a league-wide Authorized Gaming Operator program to increase transparency over the evolving licensed sports betting market for the league in Canada. Through data sharing, individual operators work with the league together to safeguard bettors.
- The program includes province-specific licensed operators partnering with the league or individual teams to allow for clearer differentiation between the regulated market and the unregulated market.
- By authenticating and regulating the CFL's sports betting landscape, the league and its partners are able to enhance and improve fans' betting experiences through licensed operator platforms across the country.





Advertising Caution

- The sports betting category represents a small percentage of the CFL's overall partnership and media business, yet we continue to make efforts to limit the volume of AGO partners that are visible in-game and will continue to consider more formal policies to manage sportsbook advertising volume and frequency.
- The CFL regularly receives fan feedback and the league monitors these submissions for complaints related to the volume of sportsbook advertising.
- Since provincial regulation of single-game wagering came into effect, responsible gaming has been shown to support sports in Canada through its ability to further engage fans, leading to increased broadcast viewership, game attendance, and consumption of earned and owned media coverage.

Conclusion

The CFL has demonstrated its commitment to the integrity of our sport and to a safe sports wagering environment for those who choose to bet on our games. We strongly believe that the measures we, and other sports leagues, have put in place support our contention that a national framework, as envisioned by Bill S-269, is not necessary.

Having said that, we do not claim perfection, on this or any other issue. We recognize that in all that we do, we must remain open-minded and continue to learn and evolve. This philosophy of constant improvement will certainly apply to our approach to sports wagering.

We have, however, shown that we are committed to this work, just as we are committed to the experience enjoyed by our fans, the health of our communities, and the well-being of our fellow Canadians.

