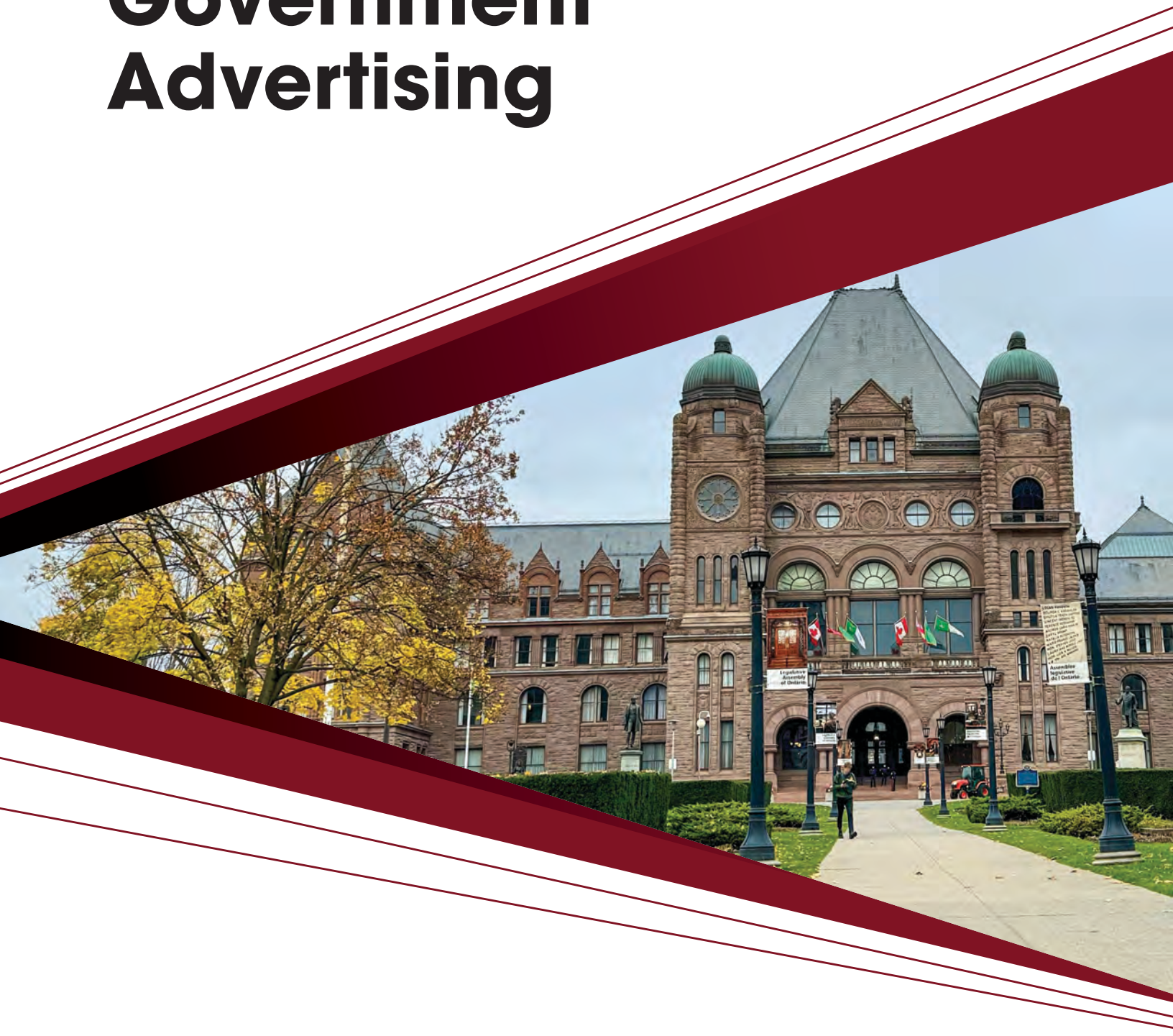
Review of Government Advertising



Office of the
Auditor General
of Ontario

ANNUAL REPORT 2025

Table of Contents

1.0 Highest Ever Recorded Government Advertising Spending, Totalling $111.9 Million in 2024/25

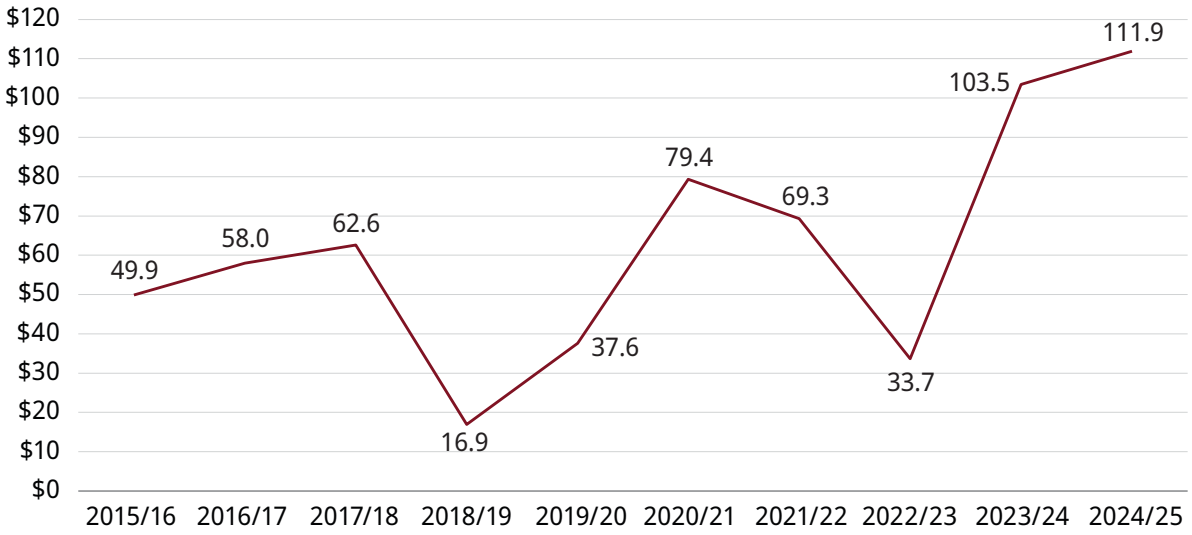
The Office of the Auditor General of Ontario (Office) has been reviewing government advertising spending annually since 2005, when the *Government Advertising Act, 2004* (Act) was proclaimed.

For the most recent fiscal year-end March 31, 2025, the Ontario government spent $111.9 million on advertising. This is $8.4 million more than the prior fiscal year, which was the most the government had ever spent previously.

Figure 1 shows the trend in government advertising expenditures over the past 10 fiscal years.

Figure 1: Ten-Year Trend in Government Advertising Expenditures ($ million)

Source of data: Ontario ministries and Supply Ontario



Spending on government advertising generally correlates with Ontario's provincial elections, peaking in 2017/18 and in 2021/22, when provincial elections were held in June 2018 and June 2022. This most recent fiscal year saw the highest ever spending on government advertising and included the election in February 2025. The trend in expenditure was also impacted by higher costs in 2020/21 for advertising about the COVID-19 pandemic.

Figure 2 shows the percentages of government spending on advertising by medium in the past fiscal year.

Figure 2: Percentages of Government Spending on Ads by Medium, 2024/25

Source of data: Ontario ministries

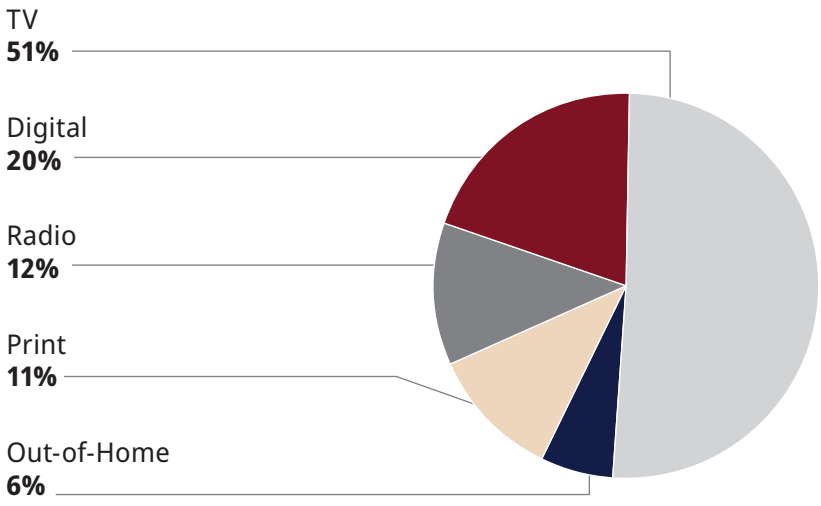


Figure 3 lists the top 10 advertising campaigns by expenditure. These 10 campaigns accounted for $98.6 million of the total amount spent on advertisements in 2024/25. The expenditure amounts include both the cost to create and/or produce the advertisement and to distribute it in the media.

Figure 3: Top 10 Advertising Campaigns by Cost, 2024/25

Source of data: Ontario ministries and Supply Ontario

Campaign Name	Host Ministry	Expenditure ($ million)
US Partnerships	Economic Development, Job Creation and Trade	40.1
It's Happening Here, Phases 2 & 3	Finance	19.2
Invest in Ontario	Economic Development, Job Creation and Trade	13.7
Highways and Infrastructure	Finance	7.9
Affordability	Finance	7.5
Foodland	Agriculture, Food and Agribusiness	2.8
It's Happening Here, Phase 4	Energy and Mines	2.1
Skilled Trades	Labour, Immigration, Training and Skills Development	1.9
Health Care Services, Launch 3	Health	1.9
Automated Licence Plate Renewal	Transportation	1.5
Total of the top 10		**98.6**
All others not in the top 10		**13.3**
Total advertising spend for 2024/25		**111.9**

☐ Flagged by our Office as an "Other Matters" submission, explained in **Section 3.0**.

The two largest campaigns, "US Partnerships" and "It's Happening Here, Phases 2 & 3," accounted for $59.3 million, or 53% of government advertising spending in 2024/25.

- The "US Partnerships" campaign ran in the US in television (TV), print and digital media formats. It cost $40.1 million, with TV making up the largest share of costs at $32.9 million. The advertising presented a look at the long-standing relationship between Canada and the US. The campaign was targeted primarily at the US during the preliminary stages of trade negotiations with Canada, in early 2025. The campaign's objective was to inform US policy decision-makers of Ontario's ability to meet the US's security and economic objectives and to strengthen trade and economic ties between the US and Ontario. The TV advertising ran in prime-time spots on CNN, Fox and other large US networks.

- The "It's Happening Here, Phases 2 & 3" campaign sought to educate the public and raise awareness of how Ontario is building its economy through the electric vehicle (EV) supply chain, and how this growth may benefit Ontarians at individual and community levels. The campaign was targeted at the general Ontario population. The advertising made claims such as "More people are working today than ever before, taking home bigger paycheques."

Although all of the advertisements complied with the Act as amended in 2015, our Office flagged six of the top 10 advertising campaigns as "Other Matters" submissions, which means that we believe the advertising would not have passed the original Act. We flagged Phase 1 of the "It's Happening Here" campaign in the prior year.

In **Section 4.0**, we describe the main flagged campaigns and explain our reasons for highlighting them.

2.0 Reviewable and Non-Reviewable Advertising

Our Office does not review every government-funded advertisement. Some advertising is exempted, depending on who is responsible for making it, what it is about, and the circumstances in which it is promoted.

The Act applies only to advertisements published by "government offices," namely provincial ministries, the Cabinet Office and the Office of the Premier. We do not review any advertising by government agencies, such as Metrolinx or LCBO, or institutions in the broader public sector that receive government funding, like hospitals or colleges.

Under a 2005 agreement, we have the authority to review third-party advertising when an organization is funded by the government to promote something. If a government office funded the item, approved the content and permitted the party to use the Ontario logo, then the Auditor General is required to review the advertisement.

Certain kinds of advertising that government offices purchase are exempted from our review. For example, job advertisements for specific roles, as well as public notices required by law or for urgent matters affecting public health or safety, are not considered eligible.

Examples of Reviewable Items:

- print newspaper ads
- billboard displays
- radio broadcasts
- television commercials
- cinema ads
- unaddressed bulk mail
- webpage banner ads
- digital screen "posters"
- "first click" website content

2.1 Social Media Advertising and Search Marketing Services Are Not Reviewable

Following Regulation 143/15 of the Act, our Office does not review certain government digital advertising, including:

- advertising items that run on social media platforms, such as Meta or Instagram; and
- spending on search marketing services, such as Google advertising, or search engine optimization.

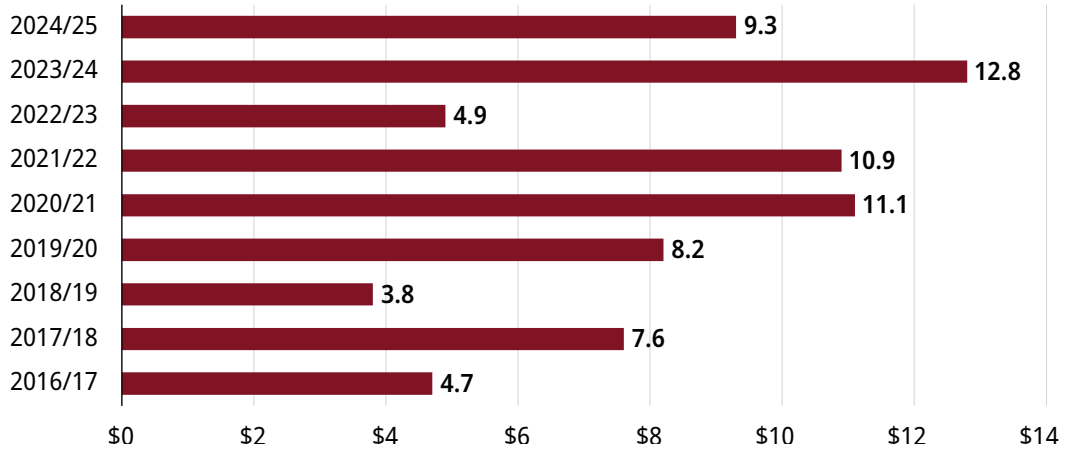
Although we do not review these kinds of digital advertising items, we report on how much the government has spent on them. In the past fiscal year, the government spent $9.3 million on non-reviewable digital advertising, or about 8.3% of total spending.

Most social media advertising was run as part of larger, reviewable campaigns that used many different delivery channels. For example, the Ministry of Economic Development, Job Creation and Trade's "Invest in Ontario" campaign cost approximately $13.7 million, of which about $419,000 was not reviewable.

Figure 4 shows the annual amounts spent by the government on non-reviewable digital advertising over the last nine fiscal years.

Figure 4: Government Spending on Non-Reviewable Digital Advertising, 2016/17–2024/25 ($ million)

Source of data: Ontario ministries and Supply Ontario



Social media advertising and search marketing services are only a fraction of the digital media landscape.

2.2 First Pages of Websites Referenced in Advertisements Are Reviewable

Soon after the original Act was passed, our Office came to an agreement with the government that the first page, or "first click," of a website cited in a reviewable item would be included in our review.

We consider the content of the first click only, unless it is a landing page or lacks meaningful content, in which case we review the next page. We examine the page for any content that does not meet the standards of the amended Act. For example, the page must not include a minister's name or photo, or the name or logo of a recognized party.

2.3 Advertising During an Election

We are also asked to review the advertising that is done during an election, once the writ drops. In 2025, there was an election and as a result the government stopped several advertisements that did not meet the standards in the Act. The standards are that ads must be removed during the writ period unless the item:

- relates to a revenue-generating activity;
- is time sensitive; or
- meets any other criteria that may be prescribed.

We reviewed the remaining ad items and agreed with the government that the advertising met the standards above.

3.0 Our Review Process

The purpose of the Act is to ensure that advertising paid for with public funds is not partisan. When the Act passed into law in 2005, the Auditor General was empowered to review and approve or reject proposed advertisements on this basis.

Government ministries submit proposed advertisements to us for review before publication. **Appendix 1** provides a detailed breakdown of reviewable advertising costs by ministry.

If our Office finds that an advertisement is not in compliance with the Act, the ministry is not allowed to run it. A revised version of the advertisement can be submitted for review. If we do not communicate a decision within five business days of a government advertising submission, the submitting ministry is deemed to have received approval.

Changes made to the Act in 2015 narrowed the definition of "partisan" and removed the Auditor General's discretion in determining an advertisement item's status. **Appendix 2** shows what was changed when the original Act was amended in 2015.

Today, besides verifying the "paid for by the Government of Ontario" symbol, our Office determines solely whether the proposed advertisement:

- includes the name, voice or image of a member of the Executive Council or of a member of the Assembly (unless the item's primary target audience is located outside of Ontario);
- includes the name or logo of a recognized party;
- directly identifies and criticizes a recognized party or a member of the Assembly; and/or
- includes, to a significant degree, a colour associated with the governing party.

If an advertisement item does not contain any of these features, it qualifies as non-partisan and our Office is bound by law to approve it, no matter what else it may communicate. We have no authority to consider any other factors, such as factual accuracy, context or tone, to determine whether an ad item is partisan. We do, however, continue to ask for factual support to be provided.

Our Office continues to identify those advertisements that would not have passed our review under the original version of the Act. These are advertising campaigns where, in our evaluation, the primary objective of the advertising is to foster a positive impression of the governing party. In these "Other Matters" cases, we document our concerns and communicate them to submitting ministries.

4.0 Campaigns We Flagged in 2024/25

In the past fiscal year, our Office flagged nine campaigns totalling $43 million, or about 38% of the $111.9 million total dollars spent on government advertising in 2024/25. The campaigns we considered to be "Other Matters" were as follows:

» **It's Happening Here, Phases 2 & 3**	Ministry of Finance	**$19.1 million**
» **Highways and Infrastructure**	Ministry of Finance	**$7.9 million**
» **Affordability**	Ministry of Finance	**$7.5 million**
» **It's Happening Here, Phase 4**	Ministry of Energy	**$2.1 million**
» **Health Care Services, Launch 3**	Ministry of Health	**$1.9 million**
» **Skilled Trades**	Ministry of Labour, Immigration, Training and Skills Development	**$1.9 million**
» **Alcohol Modernization**	Ministry of Finance	**$1.4 million**
» **Housing Supply, Phase 2b**	Ministry of Municipal Affairs and Housing	**$823,000**
» **Funding in Schools**	Ministry of Education	**$256,000**

4.1 It's Happening Here

Advertising from the "It's Happening Here" campaign depicted employees working in clean energy, mining, and EV and auto manufacturing, with the tagline "It's all happening here". These advertisements would not have passed our review under the former version of the *Government Advertising Act, 2004.* The ad items contain claims such as "More people are working today than ever before, taking home bigger paycheques" and other statements.

The advertisements were aimed at a general audience. They did not include information about services and programs, but rather appeared designed to improve Ontarians' impression of the current state of Ontario, the subtext of which promotes the governing party.

4.2 Affordability

Advertisements in the "Affordability" campaign presented a number of programs with the claim "Helping you keep more of what's yours." The advertisements featured a link to **Ontario.ca/KeepingCostsDown**.

The advertisements were aimed at a general audience and quoted dollar savings, with no explanation or support for the time frame in which those savings would be achieved. The advertisements would not have passed our review under the former Act. We believe the advertisements were designed to improve Ontarians' impression of the current state of Ontario, the subtext of which promotes the governing party.

4.3 Highways and Infrastructure

Advertising in the "Highways and Infrastructure" campaign described proposed highway projects across the province, with a unique advertisement for each geographical region. The advertising included statements such as:

- "Building the Bradford Bypass and Highway 413… And adding more lanes to reduce gridlock on some of North America's busiest routes";
- "We have a plan that's connecting Ontario"; and
- "We're upgrading Ottawa's major routes and rural roads…to relieve gridlock and shorten daily commutes."

The advertisements did not provide context or evidence to support the claims. We noted that the projects mentioned in the advertising and on the website were proposed but not yet undertaken.

We believe the primary objective of this campaign was to foster a positive impression of the governing party.

4.4 Skilled Trades

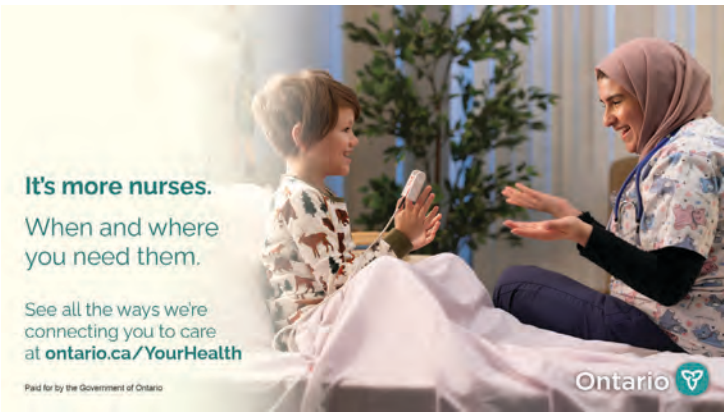
The "Skilled Trades" campaign includes a series of three rolling digital advertisements. The advertising states, "Bigger paycheques," "Bigger paycheques means brighter futures" and "Join the trades," with the same image used for each statement.

The advertising links to a campaign website, where the first page states, "1 in 6 job openings are projected to be in the skilled trades by 2026." There was no support for the claim.

We believe the primary objective of some of the advertising in the "Skilled Trades" campaign was to foster a positive impression of the governing party.

4.5 Health Care Services, Launch 3

Advertising in the third launch of the "Health Care Services" campaign featured claims such as "Family doctors in Ontario are the best paid in Canada, on average" and "It's more nurses. When and where you need them." The advertising link to a campaign website, where the first page states, "Over the next 4 years we're investing more than $225 million to expand nursing education in universities and colleges."



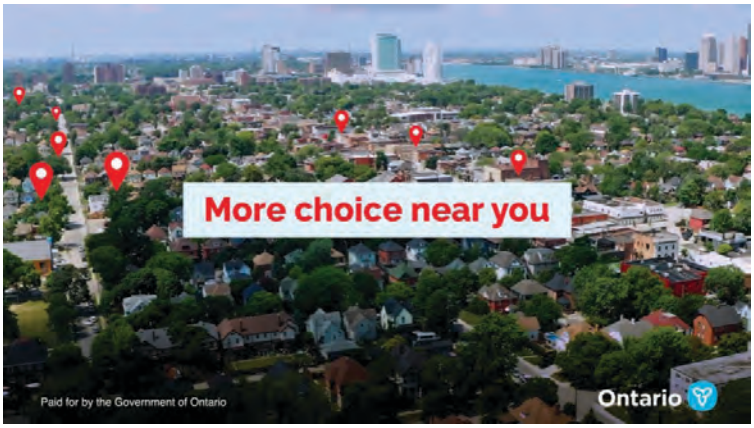
The advertising was aimed at a general audience, but did not provide information about services and programs. The advertising and the website's first page offered little context or evidence to support the claims made.

This advertising would not have passed our review under the original version of the Act. We believe the advertisements were designed to improve Ontarians' impression of the current state of Ontario, the subtext of which promotes the governing party.

4.6 Alcohol Modernization

Advertising in the "Alcohol Modernization" campaign featured claims such as "Now, even more retailers will stock your favourite drinks, as well as larger pack sizes. That's one less stop on your way to summer fun." Different advertising showed people walking into a convenience store and buying alcohol, with the caption "More choice near you."

The advertising was aimed at a general audience, but did not provide information about services and programs. The advertising was broadcast in the midst of strikes and labour negotiations with LCBO and promoted an online alcohol retailer map showing non-LCBO locations where alcohol could be purchased.



We believe the primary objective of this campaign was to improve Ontarians' impression of the current state of Ontario, the subtext of which promotes the governing party. This advertising would not have passed our review under the original version of the Act.

Why It Matters

When the *Government Advertising Act, 2004* (Act) was proclaimed, it was put in place as a safeguard to provide the people of Ontario value for money spent by the government on advertising. The intent was to ensure that taxpayers' money was not used to promote the governing party of the day, and that advertisements were informative and non-partisan. The above are cases where the Act, as amended in 2015, does not give our Office the ability to provide this oversight.

We continue to recommend that the previous version of the *Government Advertising Act, 2004* that was in force from January 30, 2006, to June 3, 2015, be reinstated and that the government revoke Ontario Regulation 143/15 under the *Government Advertising Act, 2004* to enable the Office of the Auditor General of Ontario to review all digital advertising paid for by the government, without exception. The government has not implemented our recommendations.

Appendix 1: Expenditures for Reviewable Advertisements by Ministry, 2024/25

Prepared by the Office of the Auditor General of Ontario (unaudited)

Ministry	Agency Fees, Production and Research Costs ($)	Media Costs ($)					Total ($)
		TV	Radio	Print	Digital	Out-of-Home	
Agriculture, Food and Agribusiness	496,529	–	1,178,564	348,547	212,739	–	2,236,379
Citizenship and Multiculturalism	4,961	–	–	4,730	30,514	–	40,205
Colleges, Universities, Research Excellence and Security	–	–	–	3,098	333,453	–	336,550
Economic Development, Job Creation and Trade	3,136,538	36,533,065	–	6,094,509	4,104,490	3,408,414	53,277,016
Education	37,244	–	236,487	235,359	261,480	–	770,569
Energy and Electrification	2,077,929	–	–	–	–	–	2,077,929
Environment, Conservation and Parks	27,080	–	–	–	10,146	–	37,226
Finance	4,092,777	9,356,102	6,907,193	3,046,092	6,972,271	2,264,226	32,638,660
Health	318,823	309,993	761,639	–	1,732,442	–	3,122,898
Indigenous Affairs and First Nations Economic Reconciliation	–	–	–	–	659,393	–	659,393
Infrastructure	27,963	–	–	–	–	–	27,963
Labour, Immigration, Training and Skills Development	1,717,591	–	–	27,234	218,078	–	1,962,902
Long-Term Care	166,867	–	84,414	93,598	198,621	–	543,501
Municipal Affairs and Housing	129,319	–	–	–	520,528	–	649,847
Natural Resources	1,381	–	–	66,390	84,586	–	152,357
Public and Business Service Delivery and Procurement	–	–	–	–	1,254,525	–	1,254,525
Solicitor General	131,617	–	–	–	–	–	131,617
Tourism, Culture and Gaming	7,958	–	–	–	615,006	–	622,964
Transportation	152,943	70,056	1,099,836	326,104	376,940	–	2,025,878
Treasury Board Secretariat	6,800	–	–	–	–	–	6,800
Total	**12,534,318**	**46,269,216**	**10,268,133**	**10,245,660**	**17,585,212**	**5,672,640**	**102,575,179**

Appendix 2: Section 6 of the *Government Advertising Act, 2004*, Original and Amended

Source of data: *Government Advertising Act, 2004*

Original

Required standards

6. (1) The following are the standards that an item is required to meet:

   1. It must be a reasonable means of achieving one or more of the following purposes:

      i. To inform the public of current or proposed government policies, programs or services available to them.

      ii. To inform the public of their rights and responsibilities under the law.

      iii. To encourage or discourage specific social behaviour, in the public interest.

      iv. To promote Ontario or any part of Ontario as a good place to live, work, invest, study or visit or to promote any economic activity or sector of Ontario's economy.

   2. It must include a statement that the item is paid for by the Government of Ontario.

   3. It must not include the name, voice or image of a member of the Executive Council or a member of the Assembly.

   4. It must not be partisan.

   5. It must not be a primary objective of the item to foster a positive impression of the governing party or a negative impression of a person or entity who is critical of the government.

   6. It must meet such additional standards as may be prescribed. 2004, c. 20, s. 6 (1).

Advertising outside Ontario

(2) Paragraph 3 of subsection (1) does not apply with respect to an item for which the primary target audience is located outside of Ontario. 2004, c. 20, s. 6 (2)

Partisan advertising

(3) An item is partisan if, in the opinion of the Auditor General, a primary objective of the item is to promote the partisan political interests of the governing party. 2004, c. 20, s. 6 (3).

Same

(4) The Auditor General shall consider such factors as may be prescribed, and may consider such additional factors as he or she considers appropriate, in deciding whether a primary objective of an item is to promote the partisan political interests of the governing party. 2004, c. 20, s. 6 (4).

Amended

Standards

6. (1) The following are the standards that an item is required to meet:

   1. It must include a statement that the item is paid for by the Government of Ontario.

   2. It must not be partisan as determined under subsection (2).

   3. It must meet any additional standards that may be prescribed. 2015, c.20, Sched. 14, s. 8.

Partisan advertising

(2) An item is partisan if,

   (a) it includes the name, voice or image of a member of the Executive Council or of a member of the Assembly, unless the item's primary target audience is located outside of Ontario;

   (b) it includes the name or logo of a recognized party, within the meaning of subsection 62 (5) of the *Legislative Assembly Act*;

   (c) it directly identifies and criticizes a recognized party or a member of the Assembly; or

   (d) it includes, to a significant degree, a colour associated with the governing party, subject to subsection (4).

Reference to title

(3) Clause (2) (a) does not prevent the use of a member's title.

Exception, colour

(4) Clause (2) (d) does not apply to the depiction of a thing that is commonly depicted in a colour associated with the governing party.

repealed text

new text

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