Ontario (Canada)

Online casino launch roadmap

Alcohol and Gaming Commission of Ontario (AGCO) and iGaming Ontario (iGO)

A two-key market: the AGCO registers you and tests your controls, and iGaming Ontario signs the operating agreement that lets you actually take bets.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	SETUP COST	LOCAL PRESENCE	DIFFICULTY
AGCO registration as an Internet Gaming Operator…	**6-9 months. AGCO registration takes 2+…**	**Operators pay Ontario 20% of net gaming revenue under…**	**AGCO regulatory fee CAD 100,000 per site per year…**	**No Ontario establishment rule found on the AGCO…**	**High**

STAGE 1 · Weeks 0-6 — Market and legal feasibility

- Understand the AGCO and iGO split — 1.1
- Stop any unregulated Ontario activity — 1.3
- Model net revenue after 20% payment — 1.2
- Operator or supplier — 1.4

STAGE 2 · Months 1-4 — Entity, disclosure and AGCO application

- Corporate structure and disclosures — 2.1
- One application per site — 2.3
- Standards gap analysis — 2.2
- Submit in iAGCO and pay the fee — 2.4

STAGE 3 · Months 1-6 — iGaming Ontario onboarding

- NDA, letter of agreement, data access — 3.1
- Financial package and bank diligence — 3.3
- Execute the operating agreement — 3.5
- AML documents and FINTRAC reporting — 3.2
- Systems and data readiness testing — 3.4

STAGE 4 · Months 2-6 — Platform, suppliers and ITL certification

- AGCO-registered suppliers only — 4.1
- Change classification — 4.3
- ITL certification of games and RNG — 4.2
- Data location — 4.4

STAGE 5 · Months 3-7 — Compliance controls under the Registrar's Standards

- Read the Standards as a build spec — 5.1
- Geolocation in Ontario (Std 3.02) — 5.3
- RG tools and advertising rules — 5.5
- Centralized self-exclusion (BetGuard) — 5.2
- KYC and age verification — 5.4

STAGE 6 · Months 6-9 — Go-live

- Technology compliance confirmation — 6.1
- Notification matrix and reporting — 6.3
- Control Activity Matrix (CAM) — 6.2
- Launch with operating agreement signed — 6.4

STAGE 7 · From month 9 — Ongoing obligations

- Notifications and incident reporting — 7.1
- Standards changes and audits — 7.3
- Fees, renewals and cost recovery — 7.2
- Disputes and player complaints — 7.4

Ontario (Canada): launch roadmap in detail

Alcohol and Gaming Commission of Ontario (AGCO) and iGaming Ontario (iGO) · as of 2026-11

Licence	AGCO registration as an Internet Gaming Operator (one application per site) under the Registrar's Standards for Internet Gaming, plus an operating agreement with iGaming Ontario. Registration alone does not authorize play.
Time to launch	6-9 months. AGCO registration takes 2+ months from a complete submission; control implementation, ITL certification and the iGO steps run alongside. iGO historically advised a minimum of about 90 days for its steps, and the operating agreement step is listed as variable.
Gaming tax	Operators pay Ontario 20% of net gaming revenue under the iGO operating agreement (reported by industry and press in 2026; the AGCO pages do not state a rate, so confirm in the agreement). Federal and provincial corporate and sales taxes are separate.
Setup cost	AGCO regulatory fee CAD 100,000 per site per year (one- or two-year term), plus possible investigation costs. Supplier fees CAD 3,000 or 15,000 by category. ITL certification, penetration tests and the audited control matrix are extra.
Local presence	No Ontario establishment rule found on the AGCO pages checked. Players must be physically in Ontario, and criminal background checks are needed for key individuals who are not primarily resident in Canada. Confirm entity and tax set-up with Canadian counsel.
Difficulty	High

1. Market and legal feasibility Weeks 0-6

1.1 Understand the AGCO and iGO split RECOMMENDED

The AGCO registers operators and suppliers and enforces the Registrar's Standards. iGaming Ontario, an independent agency since the iGaming Ontario Act was proclaimed on 12 May 2025, develops and signs the operating agreements and runs the market conduct side. Plan for two sets of paperwork, two contacts and two sets of requirements.

In the book: Ch. 06 Licensing Guide, Ch. 40 Case Study -- Launching in a New Regulated Market, Ch. 02 Regulation and Compliance Landscape

1.2 Model net revenue after 20% payment RECOMMENDED

Ontario's take is reported at 20% of net gaming revenue, and operators also carry marketing limits, payment costs and responsible gambling duties. The Ontario market is large (Q1 2026 reports above CAD 1B in quarterly revenue) but crowded, so model customer acquisition costs against it.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 40 Case Study -- Launching in a New Regulated Market, Ch. 30 FinOps Deep Dive

1.3 Stop any unregulated Ontario activity RECOMMENDED

Since 31 October 2022, applicants and registrants must stop unregulated Ontario igaming activity that would need registration, and may not contract with unregistered providers. If you have a grey market presence, shut it down on a documented date before you apply.

In the book: Ch. 41b Case Study: The Grey-Market Doorway and the Regulated Alternative, Ch. 40 Case Study -- Launching in a New Regulated Market, Ch. 06 Licensing Guide

1.4 Operator or supplier ALTERNATIVE

Platform and game companies that do not take bets themselves register as gaming-related suppliers instead (fee CAD 3,000 or 15,000 by category). Operators remain responsible for choosing compliant suppliers, so you will be asked for a supplier list either way.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 47d Casino as a Service: White-Label Provisioning at the Press of a Button, Ch. 06 Licensing Guide

2. Entity, disclosure and AGCO application Months 1-4

2.1 Corporate structure and disclosures RECOMMENDED

Entity disclosure covers corporate applicants, trusts and corporate shareholders with 5% or more. Personal disclosure covers officers, directors, shareholders with 5% or more, trustees and principal employees. Prepare constituting documents, financial statements, tax returns, ID, structure diagrams and criminal background checks for individuals not primarily resident in Canada.

In the book: Ch. 06 Licensing Guide, Ch. 09 Legal Framework and Contracts, Ch. 24d KYC Evidence Lifecycle

2.2 Standards gap analysis RECOMMENDED

The application includes a gap analysis against the Registrar's Standards: which you meet, which you do not, and a dated plan to close each gap. Write it with engineering, not just legal, since it commits your roadmap.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 06 Licensing Guide, Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet

2.3 One application per site RECOMMENDED

Each distinct gaming site needs its own application and CAD 100,000 fee per year. The AGCO decides whether sites are distinct from account credentials, shared e-wallets, branding and operator identity, so do not assume two brands on one wallet are one site.

In the book: Ch. 06 Licensing Guide, Ch. 47c Operating 100 Casinos From One Dashboard

2.4 Submit in iAGCO and pay the fee RECOMMENDED

Create an iAGCO account, submit the application and pay. Payments of CAD 30,000 or more go by wire or EFT, not cheque. Processing does not start until the fee is received. Expect an eligibility officer and requests for more material.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline

3. iGaming Ontario onboarding Months 1-6

3.1 NDA, letter of agreement, data access RECOMMENDED

Sign the iGO NDA (about 2 business days), then the Letter of Agreement, then set up secure data access such as SFTP or SharePoint. The NDA unlocks the draft operating agreement and policies on iGO Connect, so do it first.

In the book: Ch. 09 Legal Framework and Contracts, Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet, Ch. 40 Case Study -- Launching in a New Regulated Market

3.2 AML documents and FINTRAC reporting RECOMMENDED

iGO asks for AML documents (about 2 weeks) and the FINTRAC reporting configuration (F2R) is a prerequisite for system readiness testing. Gambling operators carry Canadian anti-money laundering reporting duties, so have an AML officer and program ready.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 19 Anti-Fraud System Deep Dive, Ch. 25b Regulatory Reporting and Evidence Export

3.3 Financial package and bank diligence RECOMMENDED

The financial step (about 1-2 weeks) includes bank due diligence and end-to-end testing of gross gaming revenue data and fund transfers. Make sure your ledger can report revenue the way iGO expects.

In the book: Ch. 36 Financial Operations, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 25b Regulatory Reporting and Evidence Export

3.4 Systems and data readiness testing RECOMMENDED

About one week of testing with iGO, after the FINTRAC configuration and financial package. Failures here delay the operating agreement, so rehearse the data feeds first.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 32 Testing and QA in Gambling, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

3.5 Execute the operating agreement RECOMMENDED

The last step, available only after the AGCO Certificate of Registration and all other steps. Timing is listed as variable. Read the agreement carefully for revenue payment, reporting, marketing and termination terms, and get Canadian counsel to review.

In the book: Ch. 09 Legal Framework and Contracts, Ch. 06 Licensing Guide, Ch. 40 Case Study -- Launching in a New Regulated Market

4. Platform, suppliers and ITL certification Months 2-6

4.1 AGCO-registered suppliers only RECOMMENDED

Game suppliers and operators of critical gaming systems must be AGCO-registered, and operators must confirm games come from registered suppliers. Build a supplier register that tracks registration status per game studio and platform vendor.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 09 Legal Framework and Contracts, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

4.2 ITL certification of games and RNG RECOMMENDED

Games, RNGs and components that process or decide bet outcomes must be certified by an AGCO-registered independent testing laboratory before deployment. Platforms themselves do not need ITL certification. Start early, since timing depends on lab capacity and scope.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 17 Random Number Generation (RNG), Ch. 32 Testing and QA in Gambling

4.3 Change classification RECOMMENDED

Modifications are non-regulatory (no recertification), regulatory (certify before deployment) or emergency fixes (deploy now, submit to an ITL within 5 business days). Tie your release pipeline to this classification.

In the book: Ch. 23b DevSecOps Pipeline Implementation: From GitHub Actions to Self-Hosted GitLab CI, Ch. 32 Testing and QA in Gambling, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

4.4 Data location OPTIONAL

The AGCO pages checked do not state a Canadian data residency rule, but operators must document third-party data centers and cloud providers and give a current SOC 2 report or ISO 27001 certificate for each. Many teams still choose a Canadian region, as the book's spoke design does.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 27c Migrating a Single-Jurisdiction Casino Platform to Hub & Spoke, Ch. 29b Datacenter Infrastructure for Regulated Gaming

5. Compliance controls under the Registrar's Standards Months 3-7

5.1 Read the Standards as a build spec RECOMMENDED

The Standards (amended May 2026) cover entity level controls, responsible gambling, prohibiting access to designated groups and player account management, game integrity and player awareness, public safety and protection of assets, and minimizing unlawful activity. Map each to a control, an owner and evidence.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

5.2 Centralized self-exclusion (BetGuard) RECOMMENDED

iGO's centralized self-exclusion program, BetGuard, launched 14 May 2026. The AGCO added Standard 2.14.1 and amended 2.14, 2.03 and 3.01 to support it. Integrate the checks and exclusions, and combine them with your own internal exclusion tools.

In the book: Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 25b Regulatory Reporting and Evidence Export

5.3 Geolocation in Ontario (Std 3.02) RECOMMENDED

Players must be within Ontario borders. You must validate location controls across the majority of expected device and network types, with dynamic location monitoring (3.02.1) and detection or prevention of common circumvention methods (3.02.2). Validation results are part of the evidence for the technology compliance confirmation.

In the book: Ch. 24e Geofencing and Location Verification, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent, Ch. 24j IP Reputation and Blocklist Integration for iGaming Platforms

5.4 KYC and age verification RECOMMENDED

Verify age (19 or older) and identity at registration, keep evidence and monitor for underage and shared accounts. Use Canadian ID verification sources and keep audit trails.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 19 Anti-Fraud System Deep Dive, Ch. 26 Responsible Gaming and Player Protection Systems

5.5 RG tools and advertising rules RECOMMENDED

Limits, time and spend information, breaks and exclusion tools are standards-based. Advertising and marketing rules sit in the Standards and AGCO guidance, so review current limits on content aimed at minors and on athletes and celebrities, which this file could not verify.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 37 Marketing Technology and CRM Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail

6. Go-live Months 6-9

6.1 Technology compliance confirmation RECOMMENDED

Operators and critical system providers submit a letter signed by the CEO and Chief Compliance Officer that the technology meets the Standards and all games are ITL-certified and from registered suppliers. Supporting evidence includes an overview of the full solution, independent vulnerability assessments and penetration tests of Ontario production systems, with severe findings fixed before go-live.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 24 Security and Compliance, Ch. 40 Case Study -- Launching in a New Regulated Market

6.2 Control Activity Matrix (CAM) RECOMMENDED

An independently audited CAM covers all gaming site controls, including third-party suppliers. Operators flagged elevated risk submit it before registration is issued; others within three months of go-live.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 25b Regulatory Reporting and Evidence Export, Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet

6.3 Notification matrix and reporting RECOMMENDED

Complete the notification matrix training (about 90 minutes), set up iAGCO regulatory reporting and the AGCO secure data channel (SFTP). The matrix was updated to version 1.6 in May 2026.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 33 Operational Playbooks, Ch. 35 Incident Management

6.4 Launch with operating agreement signed RECOMMENDED

Go live only after registration, the technology confirmation, ITL certificates and the signed iGO operating agreement are all in place. The book's case study shows how much of this is calendar management.

In the book: Ch. 40 Case Study -- Launching in a New Regulated Market, Ch. 07 Casino Implementation Planning and Timeline, Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet

7. Ongoing obligations From month 9

7.1 Notifications and incident reporting RECOMMENDED

The notification matrix lists events that must be reported to the AGCO and iGO. Wire incident management to it so reports are produced from the same data as your internal records.

In the book: Ch. 35 Incident Management, Ch. 25b Regulatory Reporting and Evidence Export, Ch. 33 Operational Playbooks

7.2 Fees, renewals and cost recovery RECOMMENDED

The AGCO fee is annual per site (one- or two-year terms are possible) and the AGCO may recover investigation and other costs. Put these in the finance calendar along with the revenue payment to Ontario.

In the book: Ch. 36 Financial Operations, Ch. 30 FinOps Deep Dive

7.3 Standards changes and audits RECOMMENDED

The Standards change often (most recently for self-exclusion). Keep a change log, update the gap analysis and CAM, and re-test geolocation and certification after major releases.

In the book: Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model, Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 32 Testing and QA in Gambling

7.4 Disputes and player complaints RECOMMENDED

Keep a documented complaints and dispute process, with a path to iGO or the AGCO as the Standards require. Track resolution times.

In the book: Ch. 33d Disputes, Chargebacks, and Player Support, Ch. 33b Workflow Engine and Case Management

Common pitfalls

- Thinking AGCO registration is permission to launch. It is not. Operating authority comes from the iGO operating agreement.
- Treating two brands as one site, or one site as two. The AGCO decides, using credentials, wallets, branding and operator identity.
- Leaving ITL booking late. Game and RNG certification depends on lab capacity and is the usual critical path.
- Weak geolocation. Standard 3.02 requires dynamic monitoring and circumvention detection validated across device and network types.
- Missing the CAM deadline. Elevated risk operators need it before registration, others within three months of go-live.
- Keeping grey market Ontario activity alive while applying. Applicants must have stopped it since October 2022.
- Shipping an outcome-affecting change without ITL review. Regulatory changes need certification before deployment, and emergency fixes need a submission within five business days.

Sources

1. AGCO: Internet Gaming Operator Application Guide
   https://www.agco.ca/en/lottery-and-gaming/guides/internet-gaming-operator-application-guide
2. AGCO: Apply to become an iGaming operator
   https://www.agco.ca/en/lottery-and-gaming/apply-become-igaming-operator

3. AGCO: Steps to joining the Ontario market
   https://www.agco.ca/en/book/export/html/246121
4. AGCO: Internet Gaming Go-Live Compliance Guide
   https://agco.ca/en/book/export/html/245851
5. AGCO: iGaming Ontario Step 7, execute the operating agreement
   https://www.agco.ca/en/lottery-and-gaming/responsibilities-and-resources/igaming-ontario-step-7-execute-operating
6. AGCO: Overview of internet gaming in Ontario
   https://www.agco.ca/en/lottery-and-gaming/overview-internet-gaming-ontario
7. AGCO: Registrar's Standards for Internet Gaming (amended May 2026)
   https://www.agco.ca/en/lottery-and-gaming/registrars-standards-internet-gaming/definitions
8. AGCO: centralized self-exclusion standards now in effect
   https://www.agco.ca/en/news/agcos-centralized-self-exclusion-standards-are-now-effect

Companion to *The Backend of Luck*. Regulations change; check every figure with the regulator and local counsel before you rely on it. This is engineering guidance, not legal advice.