PUBLIC INTEREST ADVOCACY CENTRE | LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

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The Honourable Karina Gould, MP,
Chair, Standing Committee on Finance (FINA)
Sixth Floor, 131 Queen Street
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Dear Chair Gould and Members of the Committee,

Subject: Sustainable Funding for Consumer Advocacy Groups

PIAC: A consistent and strong voice for consumers

1. Since 1976, PIAC has been a consistent and strong voice for consumers. As a national not-for-profit corporation and registered charity, we provide legal and research services on different regulatory matters, including telecommunications, broadcasting, financial services, privacy, energy, competition, consumer protection and air transportation. We advocate on behalf of consumers, with a particular focus on low-income and vulnerable consumers. We represent consumers before regulators, government departments, independent tribunals, Parliament and other organizations. PIAC ensures that consumers have a meaningful voice in complex legal, regulatory, and policy proceedings where they would otherwise lack the resources, expertise, or opportunity to participate effectively. For 50 years, PIAC has intervened on their behalf.

2. Regulators and consumer organizations perform complementary functions. Regulators perform their duties and work according to their relevant legislation and assess evidence; consumer organizations like PIAC bring forward consumers' experiences into proceedings, bills introduced at parliament, and test industry claims, identify problems that require action and propose suitable measures. The continued existence of different federal and provincial regulatory bodies and other government organizations does not replace the need to fund effective consumer participation.

PIAC's Reliance on OCA-Administered Funding through the Canadian Consumer Protection Initiative (CCPI) and its Predecessor Program

3. For many years, PIAC has relied on funding administered by the Office of Consumer Affairs (OCA)—through the former Contributions Program for Non-profit Consumer and Voluntary Organizations and, more recently, the Canadian Consumer Protection Initiative (CCPI)—to undertake critical consumer research that has not only informed PIAC's advocacy work but

enabled PIAC to play a vital role in shaping different consumer policies. We note just some examples below:

- No Consumer Left Behind: A Canadian Affordability Framework for Communications Services in a Digital Age — 2015: PIAC examined affordability, most importantly communications affordability from low-income households' perspectives. The report emphasized the importance of meeting essential needs, maintaining control over household spending and accessing communications services suited to consumers' needs. PIAC in particular asked for a specific, enforceable universal service obligation (USO) to be adopted, which shall include a requirement to provide all Canadians with "affordable" communications services.
- No Consumer Left Behind Part II: Is There a Communications Affordability Problem in Canada? — 2016: PIAC reviewed the difficulties low-income households faced in paying their communications bills, including sacrifices involving other essential goods and services. We recommended a national affordability plan and targeted support, including subsidy and other policy initiatives for low-income consumers, such as free public Internet access points and reduced sales taxes on communications equipment.
- Off the Grid: Pinpointing Location-based Technologies and the Law — 2015: PIAC examined the collection, use and disclosure of consumers' location data and the adequacy of existing legal protections. PIAC recommended stronger privacy safeguards, clearer guidance on consent and a CRTC review of telecommunications providers' location-tracking practices.
- The Privacy Box: Enabling Consumer Choice and Meaningful Consent in Online Privacy — 2017: Choice and Meaningful Consent in Online Privacy — 2017: PIAC explored the development of standardized privacy settings for online services and applications, (called the Privacy Box). Drawing on consumer research (including focus groups), we recommended measures to give consumers greater control over online tracking and the collection, use and sharing of their personal information.
- Assessing the Emergence of "Alternative" Currencies and Legal Risk: The Consumer's Perspective — 2018: PIAC reviewed alternative/cryptocurrencies from a consumer perspective, assessed their consumer risks and their suitability as a payment method and investment vehicle. PIAC recommended better consumer education and coordinated regulation to address gaps in protection, amidst other proposals.
- Consumer Choice in Telecommunications and Broadcasting — 2019: PIAC examined barriers to switching telephone, internet and television providers, including switching costs, complex service offerings and behavioural biases. PIAC suggested regulatory measures to reduce these barriers and make it easier for consumers to exercise meaningful choice.
- Unraveling Webs of Uncertainty: What an Internet Code Could Mean for Canadian Consumers — 2019: PIAC reviewed consumer concerns involving internet contracts, billing, cancellation fees and speed claims, and also assessed the CRTC's draft Internet Code (as proposed in its proceeding, Telecom Notice of Consultation CRTC 2018-422). A subsequent addendum evaluated key provisions of the final Code,

issued through Telecom Regulatory Policy CRTC 2019-269, and identified continuing gaps in consumer protection.

- Selling Speed: Reforming Broadband Advertising Regulations in Canada — 2022: PIAC reviewed broadband speed advertising and disclosure practices in Canada and some other jurisdictions. PIAC broadly recommended clear, more accurate information so consumers can easily compare internet plans and understand the internet speed they should reasonably expect.
- A Review of Restrictive Covenants and Grocery Competition in Canada — 2026: PIAC examined how restrictive covenants and exclusivity clauses can limit grocery competition and affect consumers' access to food. We recommended a publicly searchable online registry of grocery-sector property restrictions and coordinated government action to address anticompetitive restrictions in this sector, amidst other recommendations.

4. These and many other research reports have provided an evidence base for PIAC's advocacy for clear and effective consumer safeguards across a range of sectors. PIAC has publicized its findings through media releases and drawn on its research in regulatory proceedings including CRTC proceedings, government consultations and parliamentary committee appearances to advocate for consumers.

Impact on Canadians and Consumer Groups due to the sudden closure of OCA and the Canadian Consumer Protection Initiative (CCPI)

5. The announced elimination of OCA and the Canadian Consumer Protection Initiative (CCPI) puts an important source of independent consumer expertise and research at risk. Without sustainable replacement funding, consumer organizations such as PIAC could face significant challenges in retaining staff, undertaking research, and participating effectively in government consultations and regulatory proceedings. This would weaken their ability to identify harmful business practices, document consumers' experiences, and develop practical recommendations for stronger protections. The consumer problems and challenges have not diminished and with the rise of AI and new technologies, the need for clear and strong consumer representation is stronger than ever.

6. Closing OCA also risks diminishing the dedicated attention given to many consumer issues. The consequences would extend beyond the organizations receiving funding: Canadians would lose an important channel through which their concerns about affordability, access to essential services, privacy, unfair treatment and many other issues reach decisionmakers. Low-income and vulnerable consumers would be particularly affected, as they often lack the resources and/or expertise to advocate for themselves. Consumer groups, including PIAC help ensure that public policy is informed by consumers' needs and experiences, rather than predominantly by well-resourced industry participants. Stable, long-term funding is therefore essential to preserve this expertise and ensure that Canadians continue to have a meaningful voice in decisions that affect their daily lives.

7. The federal government's own 2014 evaluation recognized the disparity between the resources available to consumer organizations and those available to industry, and found that funded research helped consumer groups participate in legislative and regulatory processes.[1] Removing this support risks widening that disparity: an opportunity to submit comments does not amount to meaningful participation without the capacity to investigate problems, assess technical proposals and develop credible alternatives.

8. The continued existence of regulators and enforcement agencies does not, by itself, resolve this funding gap. The government has referred to the roles of the Financial Consumer Agency of Canada, CRTC and others being a voice for Canadians.[2] However, the relevant question is whether those institutions will replace the independent research and representation that consumer organizations provide—not simply whether they also have consumer-related responsibilities.

9. Funding instability also threatens the continuity needed to translate research into practical reform. Publishing a report should not be treated as the end of the public investment. Its recommendations may require further submissions, technical analysis, engagement with decisionmakers and monitoring of implementation. Without continuing capacity, valuable research could remain available on a website while the expertise needed to advance its findings is lost. A later restoration of funding may not immediately rebuild a departed team or recover a missed opportunity to influence policy. The focus should be on whether withdrawing funding could leave harmful practices unidentified for longer, reduce scrutiny of proposed rules, or shift more of the burden of obtaining redress onto individual households.

PIAC Key Recommendations

10. PIAC strongly recommends the government to preserve dedicated federal funding for consumer organizations. The government should consider consulting with the consumer groups to ensure the implementation of this funding model remains simple, efficient and transparent as well as consider what other issues might require attention. The objective is to ensure that Canadians retain an effective, informed and independent voice in decisions that affect them, their household budgets and access to essential services. Consumer groups provide the means to bring this perspective to the table.

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[1] Industry Canada, Audit and Evaluation Branch, Evaluation of the Office of Consumer Affairs' Contributions Program for Non-Profit Consumer and Voluntary Organizations, Final Report (December 2014), sections 3.1.1 and 3.2.1.

[2] Anne Drewa, "'You are weakening the voice of consumers': Advocacy groups reeling after Ottawa's funding cuts," (11 June 2026), *Global News BC*, online: <https://globalnews.ca/news/11900935/consumers-advocacy-groups-reeling-ottawas-funding-cuts/>.

11. PIAC particularly asks for the following:

- Establish funding of at least $5 million annually for independent consumer organizations,[3] indexed to inflation, beginning in 2027–28. Provide this funding on a stable basis through renewable five-year agreements.

- Prevent an interruption in funding after March 2027. Maintain the current OCA office or establish a clearly mandated and adequately resourced federal funding office, and provide bridge funding until the permanent arrangements are operational.

- Establish a formal framework for ongoing consultation and engagement with consumer organizations to ensure that consumer interests are consistently represented in federal policy and regulatory decision-making.

Yours Sincerely,

Tahira Dawood

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WE FIGHT FOR THAT.

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[3] This recommendation is consistent with Innovation, Science and Economic Development Canada, Government of Canada earlier news release. ISED, "Government of Canada invests in consumer advocacy for Canadians," (October 22, 2025), online: <https://www.canada.ca/en/innovation-science-economic-development/news/2025/10/government-of-canada-invests-in-consumer-advocacy-for-canadians.html>.