

**Written Submission of the Canadian Anti-Monopoly  
Project (CAMP) for the Pre-Budget Consultations in  
Advance of the 2025 Federal Budget**



Recommendations:

1. The government should exclude the Competition Bureau from its efforts to reduce government-wide program spending, recognizing the multiplier effect of dollars invested in protecting competition and improving affordability.
2. The government should boost the Competition Bureau's budget by \$25 million annually to increase the scope and speed of its enforcement efforts, enabling it to fully use the new powers granted in C-56 and C-59 to deliver a more affordable future for Canadians.

## About the Canadian Anti-Monopoly Project (CAMP)

CAMP is a think tank dedicated to addressing the harms caused by monopoly and building a more democratic economy in Canada. CAMP produces research, education and commentary to make Canada's economy more fair, free, and democratic.

### Background

Canada has a competition problem. In industries across the economy, Canadians face fewer choices as consumers, workers and entrepreneurs.

Monopoly affects Canadians in multiple dimensions of their lives. As consumers, we face fewer options, lower quality and higher prices. As workers we have less leverage in negotiations for better wages and working conditions. As entrepreneurs we are at the whims of powerful suppliers and customers. Competition is a key ingredient for balancing power in the economic exchanges we engage in to create a productive and dynamic economy.

In the [grocery market](#), Canada has gone from 8 major chains down to 5 in the past 40 years, and grocers have commanded record profits while the number of Canadians experiencing food insecurity remains at historic levels. In banking, Canadians pay [higher fees](#) for access to key financial services and have fewer channels to access the credit that would allow them to invest in and expand their businesses. In our duopoly airline market, major carriers are increasingly [carving up](#) the Canadian market rather than competing for it as disruptive, ultra-low-cost carriers struggle to gain a foothold.

Canadians correctly understand the role that a lack of competition has played in the ongoing cost of living crisis. Polling [indicates](#) that 69% of Canadians strongly believe inflation is worsened by companies exercising their market power to raise prices, and the rising cost of living remains [top of mind](#) for Canadians.

**Recommendation: The government should exclude the Competition Bureau from its efforts to reduce government-wide program spending, recognizing the multiplier effect of dollars invested in protecting competition and improving affordability.**

As Canada's sole competition law enforcement agency, a well-resourced Competition Bureau is a key ingredient to building a more competitive Canadian economy. Every dollar invested in the Bureau generates serious returns for Canadians. Under the Bureau's [own estimates](#), the actions of the enforcer save Canadians \$2.2 billion annually, a 30-to-1 return on every dollar invested in the organization.

The Bureau currently has ongoing investigations and litigation into potential competitive harms in the markets for groceries, real estate, gasoline, telecommunications, food delivery, and digital advertising. Each of these investigations has the potential to unlock a more competitive marketplace for Canadians and chip away at the multi-billion dollar [monopoly tax](#) Canadians pay annually.

While we understand the government's goal of bringing down total program spending, cuts should not include agencies delivering such high returns for Canadians. As the cost of living continues to be a top concern, including the Bureau in program spending cuts would compromise the ability of the enforcer to improve affordability in important markets across the economy.

**Recommendation: The government should boost the Competition Bureau's budget by \$25 million annually to increase the scope and speed of its enforcement efforts, enabling it to fully use the new powers granted in C-56 and C-59 to deliver a more affordable future for Canadians.**

Rather than clawing back resources, the government should build on recent financial and policy investments in the Bureau and further expand the ability of the enforcer to protect competition and Canadians.

After more than a decade of financial stagnation, in 2021 the government provided the Competition Bureau with a [much-needed increase](#) to its annual budget of \$96 million over 5 years and \$27.5 million annually thereafter. In 2023 and 2024 the government followed these financial investments with generational improvements to the *Competition Act* through Bill C-56 and Bill C-59.

The 2021 funding increase represented an important contribution to effective competition law enforcement in Canada, making up for a decade-long real decline in the Bureau's resources. But that increase did not contemplate the expanded responsibilities that C-56 and C-59 entail and the spike in inflation that began in 2021. Both micro and macro forces mean today the Bureau is required to do more with less.

In its enforcement work, the Bureau goes up against some of the largest corporations on the planet. To prove a case the Bureau must bring not only legal but also economic evidence to bear, and the [Bureau](#) and enforcers in [other jurisdictions](#) have noted the increasing resource arms race involved to bring a successful case. In the Rogers-Shaw merger litigation alone, the merging parties [spent in excess](#) of \$30 million defending against the Competition Bureau's challenge of the merger.

Beyond these rising costs, after the passage of C-56 and C-59, the scope of the Bureau's enforcement has increased. Conduct that would previously not trigger enforcement action will now require investigation and possibly litigation. In addition to an expanded scope of enforcement, the Bureau has also been given the authority to conduct market studies, diving into markets and analyzing competition issues and their potential remedies. Though not law enforcement, in peer jurisdictions these studies command a similar level of investigation and analysis to identify issues and provide solutions to policy makers to improve competition and affordability.

Taken together, the amendments to the *Competition Act* contained in C-56 and C-59 broaden the scope of Canada's competition law and create the potential for a much more active competition law in Canada. But that potential will be wasted if the Bureau is not properly resourced.

Laws are only as effective as their enforcement. Given the organization's new responsibilities flowing from C-56 and C-59 and rising costs arising from inflation, it is essential that the Bureau is properly resourced to protect competition in Canada's over \$2 trillion economy. We recommend that the government provide additional funding to the Competition Bureau for expanded enforcement and market study efforts at an ongoing rate of \$25 million per annum.