



Competition Bureau
Canada

Bureau de la concurrence
Canada

COMPETITION IS KEY

Creating the
conditions
for innovation

THE COMPETITION BUREAU OF CANADA
2017–2018 ANNUAL PLAN



Canada

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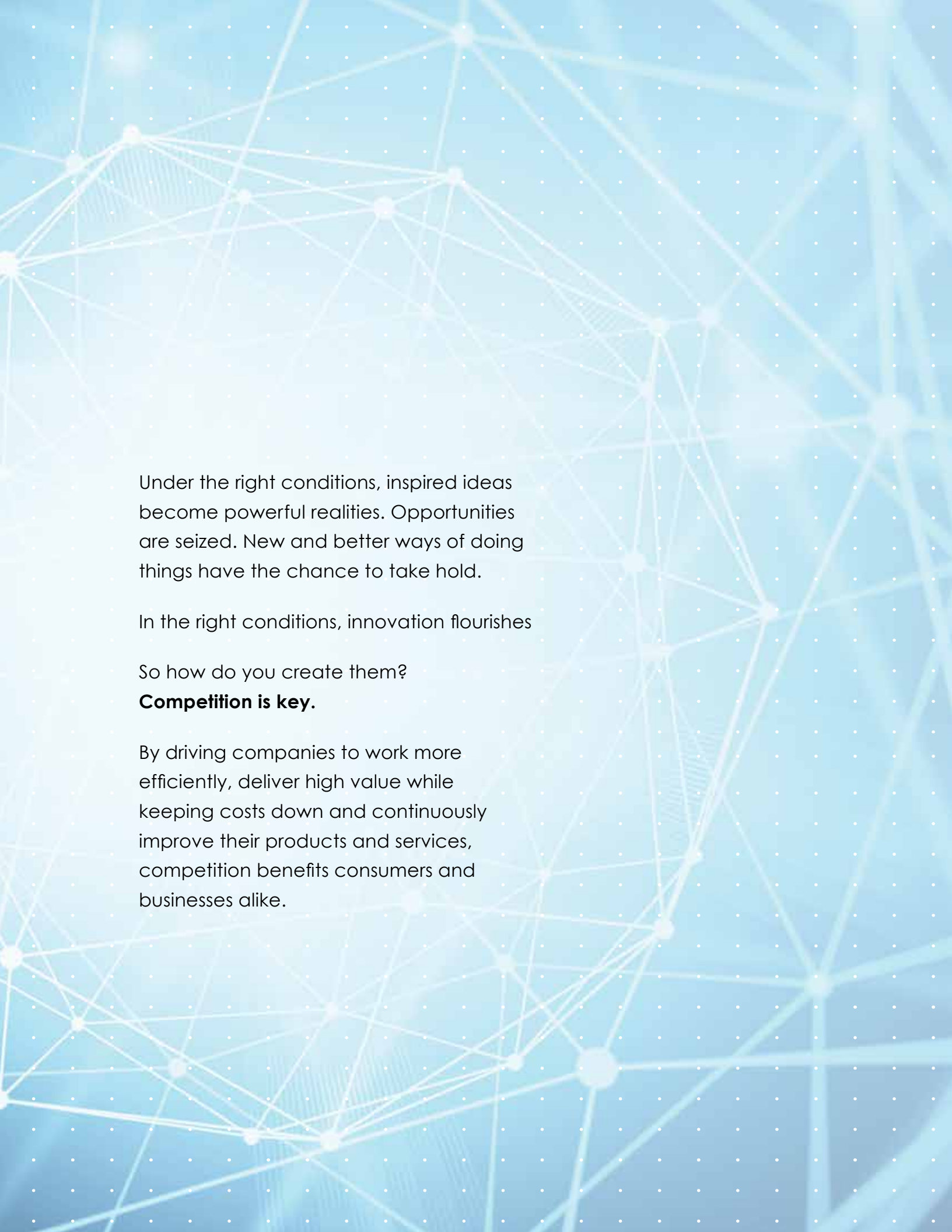
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Under the right conditions, inspired ideas become powerful realities. Opportunities are seized. New and better ways of doing things have the chance to take hold.

In the right conditions, innovation flourishes

So how do you create them?

Competition is key.

By driving companies to work more efficiently, deliver high value while keeping costs down and continuously improve their products and services, competition benefits consumers and businesses alike.



MESSAGE FROM THE COMMISSIONER

Innovation remains a key theme for us at the Competition Bureau heading into 2017–2018. With countries around the world seeking to attract talent, develop new technologies and grow successful companies, Canada is in the midst of a global innovation race. We know open and competitive markets spur innovation by stimulating creative thinking, driving efficiency and energizing productivity.

This annual plan sets out the ways we intend to help create the conditions for innovation over the coming year, whether by promoting fair competition and confidence in the digital economy, advocating for pro-competition regulations in the financial services sector, examining the growing use of big data or tackling online deceptive marketing practices.

As the marketplace becomes more complex and increasingly globalized, we recognize the importance of partnering with other Canadian agencies and international peers. Doing so extends our reach while making efficient use of our available resources — without duplicating effort, time or cost.

We are committed to ensuring our efforts make a difference in the context of evolving market conditions, identifying areas of emerging, new or pressing need. At the same time, we remain dedicated to executing our core mandate of protecting competition and enforcing Canada's competition laws for the benefit of companies and consumers.

In addition to several new activities, we will continue efforts underway on several fronts, furthering the good work we have been doing as we enter this third and final year of our *2015–2018 Strategic Vision*. Some of those ongoing activities include raising awareness and undertaking outreach related to fraud prevention and bid-rigging on infrastructure projects, as well as promoting compliance among small and medium-sized businesses.

With Canada about to celebrate its 150th anniversary, we think all Canadians should be proud of the fact that Canada enjoys fair, competitive markets today. We at the Bureau are certainly proud to contribute to ensuring that Canadians have every opportunity to pursue their business visions on a level playing field and that consumers can enjoy the benefits of fair, healthy, competitive markets.

Sincerely,

John Pecman
Commissioner of Competition



WE ARE CANADA'S COMPETITION BUREAU

The Competition Bureau (Bureau) has a legislated mandate to ensure that Canadian businesses and consumers prosper in a competitive and innovative marketplace. We are committed to doing so through all means available, from law **enforcement** to competition **promotion**.

Our responsibilities

Headed by the Commissioner of Competition, the Bureau administers and enforces the *Competition Act*, the *Consumer Packaging and Labelling Act* (except enforcement as it relates to food), the *Textile Labelling Act* and the *Precious Metals Marking Act* (collectively referred to as the Acts).

Our guiding principles

Vision

To be one of the leading competition agencies in the world; one that is open, transparent and collaborative, and that vigorously enforces and promotes competition to provide Canadians with the benefits of a competitive and innovative marketplace.

Mission

To promote and protect competition for the benefit of Canadians, the Bureau will administer and enforce the Acts with fairness and predictability, to:

- Prevent and deter anti-competitive behaviour and deceptive marketing practices
- Review mergers to ensure they do not harm competition
- Empower consumers and businesses

Our core values

Openness and transparency

We engage with our stakeholders through a wide range of new and existing means of communication to dialogue and share information, and to explain to Canadians and our partners the benefits of competition for consumers, businesses and the productivity of the Canadian economy.

Collaboration

We work with our partners to advance competition to ensure our marketplace is functioning efficiently.

Integrity and fairness

We act with integrity and fairness and in the public interest at all times. This requires a principle-based approach to enforcing and administering the Acts. Our decisions are based on facts, evidence and sound judgement. We are committed to protecting the confidentiality of sensitive information.

Respect

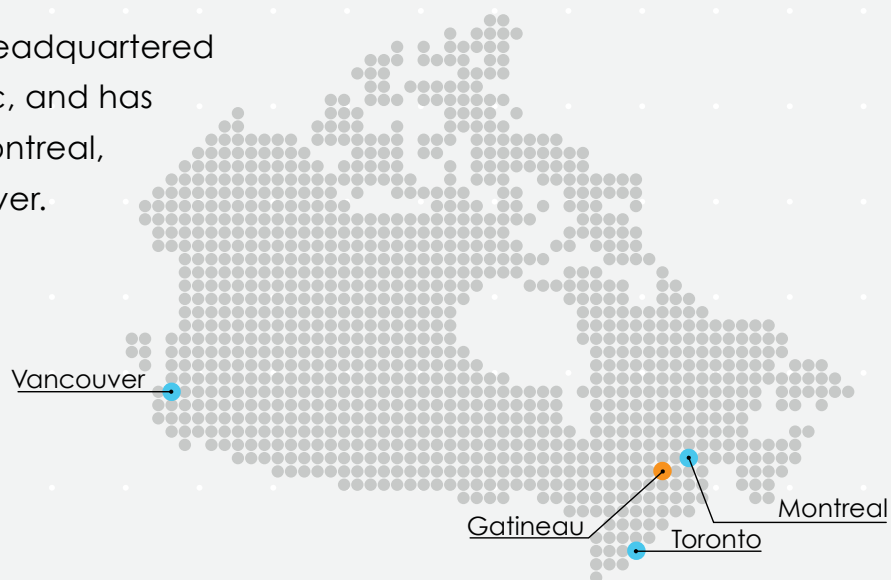
We interact honestly and respectfully with our colleagues, partners and all Canadians — recognizing their diversity and their individual contributions to healthy competition.

Leadership

We show leadership through our actions, strategic approach and commitment to continuous innovation.

THE BUREAU AT A GLANCE

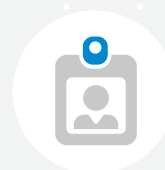
Our organization is headquartered in Gatineau, Quebec, and has regional offices in Montreal, Toronto and Vancouver.



Budget and employees



Budget for 2017–2018:
\$48.392 million



Planned FTE¹ for 2017–2018:
371

¹ Full-time equivalent employees.

Our structure

Enforcement branches

Cartels and Deceptive Marketing Practices Branch

- Cartels Directorate
- Deceptive Marketing Practices Directorate

Mergers and Monopolistic Practices Branch

- Mergers Directorate
- Monopolistic Practices Directorate

Enforcement support branches

Competition Promotion Branch

- Economic Analysis Directorate
- International Affairs Directorate
- Policy, Planning and Advocacy Directorate
- Public Affairs and Outreach Directorate
- Compliance Unit

Corporate Services Branch

- Enforcement Services Directorate
- Finance, Administration and Information Management Directorate
- Talent Management and Development Directorate

How we do our work

As part of our integrated approach to enforcing and administering the Acts under our jurisdiction, we employ a range of tools including enforcement, advocacy and outreach in complimentary ways to maximize compliance with the laws, and ensure

a competitive and innovative marketplace that benefits consumers, businesses and the Canadian economy. Together, these instruments make up our Competition and Compliance Framework.



ADVOCACY

Advice to Governments

Market Studies

Regulatory Interventions



OUTREACH

General Information

Formal Guidance

Specific Announcements



ENFORCEMENT

Facilitating Voluntary Compliance

Contested Proceedings

Consensual Resolutions

OUR STRATEGIC OBJECTIVES

The Bureau's *2015–2018 Strategic Vision* describes the mission and values at the core of our organization, and sets out five strategic objectives that guide our work on behalf of consumers and businesses. As we head into the third and final year of our current *Strategic Vision*, these objectives will continue to drive our activities in 2017–2018.

- 1 **Increase compliance** – Use all available tools to increase compliance with Canada's competition laws and prevent and deter anti-competitive or deceptive conduct that could threaten the health, growth and confidence in the Canadian economy.
.....
- 2 **Empower Canadians** – Create an environment of competitive prices, greater product choice and informed decision-making for the benefit of all Canadians.
.....
- 3 **Promote competition** – Promote and advocate for a more competitive marketplace, emphasizing smart regulation focused on achieving legitimate regulatory objectives.
.....
- 4 **Collaborate with partners** – Collaborate with domestic and international partners to promote strong competition principles and expand opportunities for Canadian participation in world markets.
.....
- 5 **Champion excellence** – Promote a culture of excellence throughout the Bureau founded on openness, collaboration and engagement, and securing tangible results.
.....

STRATEGIC PLANNING AND PERFORMANCE

The Bureau's integrated planning links annual activities with longer-term goals and brings greater transparency to the planning and reporting process. It involves:

Environmental scanning of our internal and external environment to identify trends and emerging issues that may have an impact on our current and future work. As part of this process, we identify key elements that influence our environment as well as signs of disruptive change. Environmental scanning allows us to think critically about our strategic decisions and prepare to respond to the important changes in our environment.

Priority setting to identify high-level areas of focus for the year — opportunities to achieve the greatest impact in advancing the strategic objectives of our *2015–2018 Strategic Vision*. Detailed operational plans set out our objectives and intended activities for the year and inform our management team's performance agreements. Together, these priority-setting activities shape the annual plan,

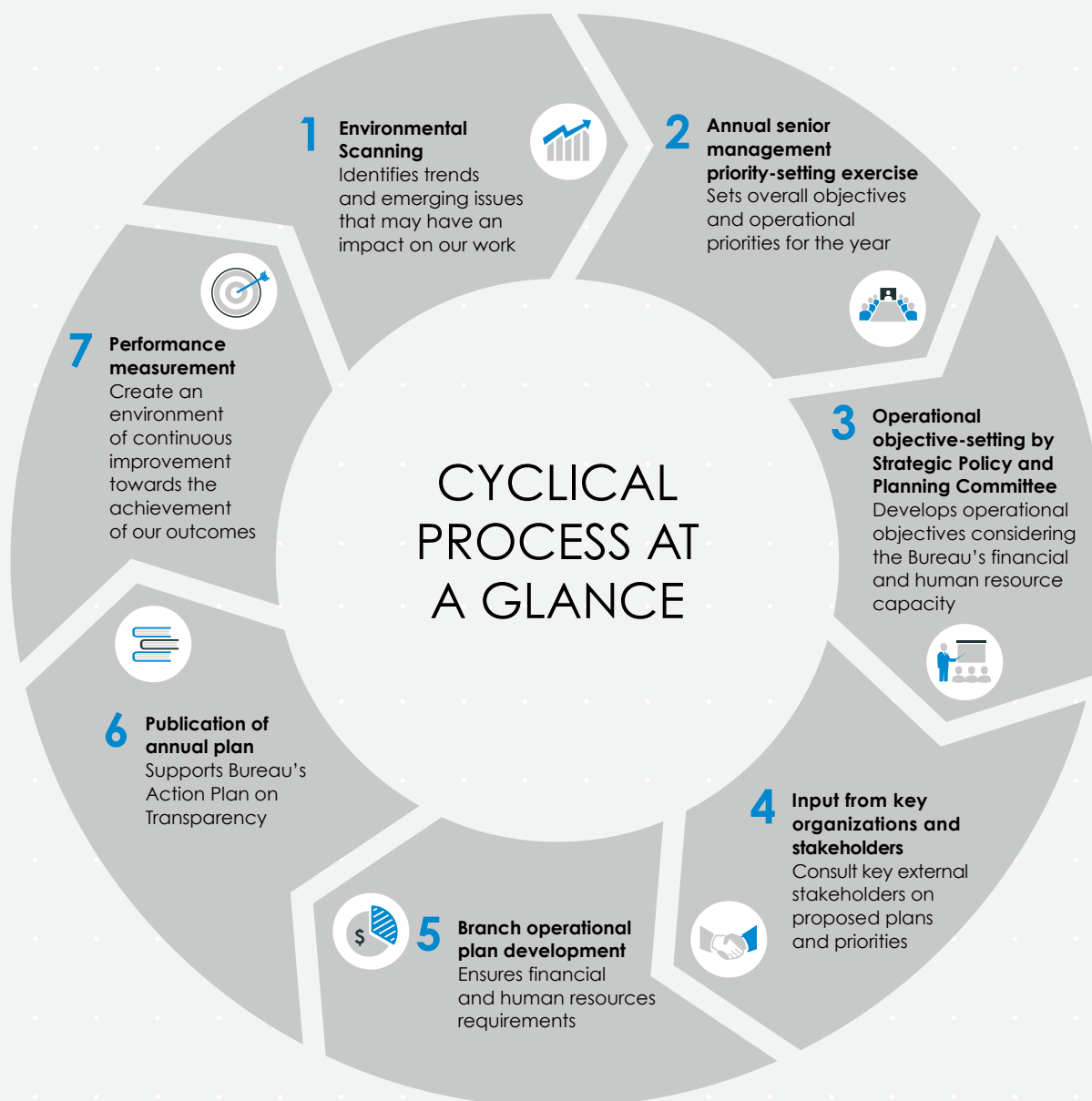
which shares our goals with Canadian consumers and other stakeholders and outlines how we intend to realize our strategic vision.

Performance reporting on a quarterly and annual basis to track progress and ensure accountability. Our quarterly reports provide statistical information on merger and non-merger enforcement matters as well as advocacy, outreach and partnership initiatives. In 2016, as a first step to improving our performance management and measurement approach, we published our first Performance Measurement Dashboard, demonstrating progress against the priorities of our 2016–2017 Annual Plan in a concise and simple format. Together the quarterly reports and dashboard provide a comprehensive view of Bureau performance.

Our Annual Report describes how we have delivered on the priorities and commitments of our annual plan in a given fiscal year and highlights the impact of our work. This report is tabled in Parliament.

As well, we report administratively to Innovation, Science and Economic Development Canada through its annual departmental plan and corresponding departmental performance report, both of which are tabled in Parliament.

Figure 1. Our cyclical process at a glance



OUR PRIORITIES FOR 2017–2018

INCREASE COMPLIANCE



Use all available tools to increase compliance with Canada's competition laws and prevent and deter anti-competitive or deceptive conduct that could threaten the health, growth and confidence in the Canadian economy.

When all players in the marketplace follow competition laws, everybody wins: consumers, companies and the economy as a whole. To increase compliance in 2017–2018, we will continue to:

- Enforce the *Competition Act* and labelling statutes to detect, investigate and deter abuse of dominance, cartels and deceptive marketing practices
- Review mergers of all sizes to ensure they do not reduce or prevent competition
- Engage in targeted outreach with small and medium-sized businesses to promote the adoption of competition compliance programs

We also recognize that the rapid emergence and growth of the digital marketplace has changed the landscape for consumers and businesses in Canada and around the world. As such, the digital economy will remain a key priority in the coming year. We will also take action to prevent bid-rigging on public infrastructure projects to protect Canadians and foster a healthy, competitive, innovative marketplace.

Why digital matters

Most businesses today have an online presence and use digital media to advertise goods and services — and Canadians are expected to spend \$39 billion online by 2019.² In the words of Navdeep Bains, Minister of Innovation, Science and Economic Development, “the digital economy is the economy”³.

2 Canadian Internet Registration Authority. (March 2016). *The state of e-commerce in Canada*. <https://cira.ca/sites/default/files/public/Ecommerce-Factbook-March-2016.pdf>

3 The Honourable Navdeep Bains. Minister of Innovation, Science and Economic Development. Ottawa. (November, 2016). *2016 conference of the Canadian Chapter of the International Institute of Communications (IIC Canada)*.

1. THE DIGITAL ECONOMY

We will build confidence and support innovation in the digital economy by deterring anti-competitive conduct that impedes new entrants, products and services — and act against deceptive marketing practices that undermine consumer confidence, such as, astroturfing, hidden fees (drip pricing) and hidden terms and conditions (such as “subscription” traps).

In 2017–2018, we will focus on high-impact digital economy enforcement cases⁴. We will continue our work on 53 active digital economy enforcement cases⁵ carried forward from the previous year, including our ongoing litigation related to e-books. In addition, where necessary, we will update our

enforcement guidance on the digital economy and non-price effects based on case law, such as decisions in the Toronto Real Estate Board (TREB) case expected to be released in 2017.

DIGITAL ECONOMY OBJECTIVE

Ongoing

Pursue high-impact enforcement cases against deceptive marketing practices



OTHER ACTIVITIES

COMPETITIVE IN CANADA MEANS COMPETITIVE ABROAD

In support of the federal government's initiatives to attract global capital to Canada, we will work to ensure new competitors can enter and participate in the Canadian market unimpeded by anti-competitive conduct. At the same time, we will foster a competitive domestic marketplace that will better position Canadian companies to compete on the global stage.

4 Cases that support innovation and the competitiveness of the digital economy (including but not limited to e-business, online promotions, sales and transfers, infrastructure support) by deterring anti-competitive conduct such as impeding new entrants, products or services and by stopping deceptive marketing practices online including activities that engage the Canadian Anti-Spam Legislation provisions.

2. SAFEGUARDING INFRASTRUCTURE SPENDING

Bid-rigging has a high cost for Canadian taxpayers and the economy, especially when large infrastructure contracts are involved. With the federal government's commitment of over \$180 billion to infrastructure projects over the coming years, we are committed to safeguard public investments through vigilant detection, prevention and enforcement.

Working with the Royal Canadian Mounted Police (RCMP) and Public Services Procurement Canada (PSPC), a key initiative in 2017–2018 is a dedicated tipline, launched April 21, 2017, for Canadians to report fraud, corruption, and bid-rigging related to federal government contracts. We will also further our work with PSPC to develop data-screening algorithms that analyze bid submissions for signs of agreements among competitors.

A key way to prevent bid-rigging is to ensure bidders and the procurement community understand what it is and the harm it causes. Building on our increased outreach efforts from 2016–2017,

we will continue to raise awareness and promote compliance by delivering presentations on bid-rigging and compliance to bidders and the procurement community across Canada with a goal of covering every region by the end of 2017 in honour of Canada's 150th birthday.

PREVENTING AND DETERRING BID-RIGGING IN INFRASTRUCTURE OBJECTIVES

New

Set up and promote
bid-rigging tipline

Ongoing

Continue to raise procurement
community and bidder awareness
of bid-rigging and compliance



EMPOWER CANADIANS



Create an environment of competitive prices, greater product choice and informed decision-making for the benefit of all Canadians.

Having access to accurate information and being aware of risks helps Canadian consumers and businesses protect themselves against fraud and deceptive marketing practices. Over the coming year we will continue to:

- Give consumers and businesses the information and support they need to protect themselves against the harms of anti-competitive behaviour
- Increase our outreach by meeting with consumer groups, intensifying our use of social media and publishing our *Deceptive Marketing Practices Digest*, among other activities
- Identify important consumer issues and breaches of the laws under our jurisdiction by monitoring consumer complaints and inquiries

In particular, we will focus on tackling deceptive marketing practices in 2017–2018, expanding our work in this area through awareness-raising and outreach to ensure Canadians are able to make informed purchasing choices.

How much does fraud cost Canadians?

According to the Canadian Anti-Fraud Centre, Canadians lost more than \$80 million to fraud in 2016 — \$20 million more than in the previous year.

3. HELPING CANADIANS TO PROTECT THEMSELVES

To help prevent Canadian businesses and consumers from becoming victims of deceptive marketing practices, we will increase the number and reach of our consumer and business alerts on deceptive marketing practices, misleading advertising, fraud and scams.

Our target is to generate at least one alert per month for a minimum total of 12 over the year and to increase engagement by tailoring the communication method to the target audience. In 2016–2017, we published 10 consumer alerts on issues ranging from fake charity and donation appeals following the Fort McMurray fires to “free real estate investments seminars”, deceptive tactics used by online dating sites and fine-print disclaimers in sports streaming packages.

Once again, we will lead the Fraud Prevention Month Forum and collaborate with our partners to raise awareness of fraud and scams during Fraud

Prevention Month (March 2018). This includes partnering with the Better Business Bureau and Option consommateurs to promote a list of Top 10 fraud schemes. We will also continue to take enforcement action against scammers and businesses that use deceptive marketing tactics.

DECEPTIVE MARKETING OBJECTIVES

New

Increase consumer and business alerts

Ongoing

Collaborate on Fraud Prevention Month activities

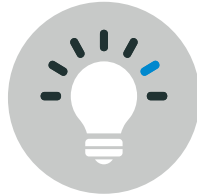


OTHER ACTIVITIES

FORMALIZING OUTREACH

To focus our efforts where they will have the greatest impact in empowering Canadians and increasing awareness of our role, we will begin implementing a formal Outreach Strategy in 2017–2018. This will include focusing our outreach efforts on the small and medium-sized business community across Canada.

PROMOTE COMPETITION



Promote and advocate for a more competitive marketplace, emphasizing smart regulation focused on achieving legitimate regulatory objectives.

Competitive, innovative marketplaces don't stand still. As they evolve, the ways they are regulated, overseen and engaged with must evolve as well.

To promote competition and ensure our approaches keep pace, in 2017–2018 we will continue to advocate for fewer competition barriers in regulated markets — informing businesses and consumers about the benefits of increased competition and sharing our expertise and knowledge with governments, sector regulators, businesses and consumers.

As technological change spurs new business models, we will engage policy makers and thought leaders on emerging issues such as big data and foster a pro-competitive regulatory approach to the financial technology services (FinTech) sector.

4. EMERGING COMPETITION ISSUES

To encourage and broaden competition enforcement and policy dialogue in Canada, and engage with stakeholders on emerging issues, we will increase our engagement with policy thought leaders and think tanks over the year. One of our key objectives is to consult on and publish a white paper exploring big data.

With the expansion of digital technologies, the amount of consumer data available has exponentially increased. This has led to massive data sets that can be analyzed to identify patterns and trends that inform decision-making. In 2017–2018, we will publish a white paper exploring issues related to big data, from a competition perspective, and articulate the Bureau's approach to big data in enforcement matters. Activities like these build on our past work, such as the workshop we held

in 2016–2017 on the policy implications of disruptive business models and non-price effects in competition analysis.

INFORMING DIALOGUE OBJECTIVES

New

Increase engagement with policy thought leaders and think tanks

New

Publish a white paper on big data

5. FOSTERING INNOVATION THROUGH PRO-COMPETITIVE REGULATION

Unnecessary and over-restrictive regulations can stifle competition and innovation just as much as anti-competitive behaviour. By providing advice to government, regulators and other decision makers, we advocate for a pro-competitive, innovation-friendly approach to regulation.

We will complete our market study of Canada's FinTech sector and publish a report in late 2017. The study will explore the competitive impact of financial technologies, barriers to entry, and whether or not regulatory reform is needed to promote greater competition and maintain consumer confidence in this sector. In keeping with the government's broader commitment to support innovation in financial services, the study will allow

us to advise and guide financial-sector regulators and other authorities on how to ensure regulation does not unnecessarily impede innovation and competition in a sector that has the potential to benefit both consumers and businesses.

FOSTERING INNOVATION OBJECTIVE

Ongoing Complete market study of the Canadian FinTech sector and publish a report



OTHER ACTIVITIES

ADVANCING OUR ADVOCACY STRATEGY

We will formulate and implement an Advocacy Strategy to strengthen and focus our advocacy work and guide future initiatives. While an Advocacy Strategy was originally proposed in 2015–2016, the Advocacy Unit underwent a formative evaluation by the Audit and Evaluation Branch of Innovation, Science and Economic Development Canada that year. As a result, the strategy was postponed until 2017–2018 to ensure consistency with the recommendations from the evaluation, which include improvements to increase the profile and functioning of the Advocacy Unit.

COLLABORATE WITH PARTNERS



Collaborate with domestic and international partners to promote strong competition principles and expand opportunities for Canadian participation in world markets.

Today's markets are complex, fast-moving and involve many stakeholders — and increasingly stretch across borders. Ensuring healthy competition and taking action against unlawful practices both demand a partnership approach. Throughout the upcoming planning period we will continue to:

- Collaborate with domestic and international partners to further promote and protect a competitive marketplace, assess mergers and address anti-competitive conduct and transactions that cross borders
- Promote sound competition policies internationally
- Support the negotiation of competition provisions in Canada's international trade agreements, and participate in Canada's exploratory discussions for potential new Free Trade Agreements, including ongoing exploratory discussions with China

- Participate in at least two technical cooperation and capacity-building projects with other competition authorities
- Engage in capacity building through international staff exchanges

In 2017–2018, we will also host the Annual International Competition Network (ICN) Cartel Workshop, negotiate new cooperation instruments and contribute to the competition work of international organizations — facilitating the exchange and adoption of best practices, and helping to ensure that competition is a cornerstone of Canada's participation in the global marketplace.

Partnership pays off

Last year, our collaboration with the U.S. Department of Justice Antitrust Division resulted in a guilty plea and a US\$130 million fine for international cartel activity in the auto parts industry, affecting Canada and the United States — proving the effectiveness of international coordination while preventing costly duplication of effort and making the best use of our resources.

6. STRENGTHENING OUR PARTNERSHIPS

In 2017–2018, we will enhance and strengthen our networks of partners to address anti-competitive activities and deceptive marketing practices, and promote best practices at an international level.

A key event on this front will be our hosting of the 14th Annual ICN Cartel Workshop, which will focus on combatting price-fixing and bid-rigging in public procurement. Representatives from more than 50 international competition law enforcement agencies and speakers from the procurement community will share best practices and tools for preventing, recognizing and rejecting bid-rigging and other unlawful cartel activities, including principles of tender design, proactive detection and deterrence, and corporate compliance programs.

STRENGTHENING PARTNERSHIP OBJECTIVES

New	Host the 14 th Annual ICN Cartel Workshop
New	Co-chair ICN Agency Effectiveness Working Group
Ongoing	Continue leadership roles in OECD, ICN and ICPEN

In addition, we will further our international enforcement collaboration by negotiating at least two new cooperation instruments to facilitate cooperation on cases and enhance our ability to protect consumers from cross-border anti-competitive practices. To deepen our existing collaborations, we will pursue second generation arrangements⁵ with competition authorities in other jurisdictions. We will continue our leadership roles in the ICN, the Organisation for Economic Co-operation and Development (OECD), the International Consumer Protection and Enforcement Network (ICPEN) and the International Mass Marketing Fraud Working Group. Specifically, we will provide at least two submissions to the OECD Competition Committee, continue to work closely with the ICN Merger Working Group and continue our coordination of the ICPEN's annual international Internet sweep.

We will also co-chair the ICN Agency Effectiveness Working Group, which aims to share, develop and disseminate best practices for agency effectiveness among ICN members and NGAs, including practices for strategy and planning, operations, and enforcement tools and procedures. Within this Working Group, we will spearhead an increased involvement of Chief/Senior Economists within the ICN to further develop and emphasize the importance of economics in competition analysis.

5 Second generation agreements provide a framework for competition authorities to exchange confidential information under certain circumstances, without seeking prior consent from the source of the information.

CHAMPION EXCELLENCE



Promote a culture of excellence throughout the Bureau founded on openness, collaboration and engagement, and securing tangible results.

To make the fullest use of our resources and achieve our goals, we recognize the importance of providing a healthy, engaged workplace that fosters excellence. In 2017–2018, we will continue to:

- Promote a culture of excellence centered on building talent
- Foster a healthy, diverse and inclusive workplace based on the principles of transparency, continuous improvement and engagement — aligned with the government's broader efforts to build an agile workforce, ensure sound stewardship and work as one

To continuously improve the ways we track and measure our performance, in the coming year we will enhance our Performance Management Framework. We will also focus on cultivating a high-performance organization and a healthy, inclusive work environment for employees.



7. ENHANCING OUR PERFORMANCE MEASUREMENT FRAMEWORK

To better determine our impact and effectiveness, in 2017–2018 we will enhance our Performance Measurement Framework — creating an environment of continuous improvement toward the achievement of the Bureau's long term outcomes. Surveys, social media analytics and other methods will be used to measure outcome-based results. This work builds on last year's development of specific metrics to measure performance against our 2016–2017 Annual Plan.

PERFORMANCE MEASUREMENT OBJECTIVE

New

Using new methods to enhance our performance measurement framework



OTHER ACTIVITIES

DEEPENING OUR CAPACITY

Based on internal assessments carried out in 2016, we will continue to streamline processes and to enhance the use of technology in relation to evidence handling to ensure we have the tools to effectively and efficiently process, analyze, produce and present large volumes of case-related data. We will also work with our governance committees to enhance our approach to and analysis of cases, and build our econometric capacity and experience throughout the year.

As part of our goal of continuous improvement, we have undertaken a review of our Immunity and Leniency programs in consultation with the Public Prosecution Service of Canada and the Bar Associations of Canada and the U.S. Through this review, we are focused on improving processes, cooperation, timeliness and further promoting the use of these programs. We plan on consulting on the proposed changes later this year. An external review was also conducted on various aspects of how we conduct our cartel investigations with a view to improving timeliness and the capacity to continue to tackle complex matters. We will formulate concrete recommendations arising from this review.

In recent years, our total amount of merger fee revenues has remained steady, while the complexity of mergers and merger reviews has increased, in part due to the recent Supreme Court Tervita decision. In 2017–2018, we will explore proposals to increase merger fee revenue.

8. OUR WORKFORCE AND ENVIRONMENT

We have taken important steps toward ensuring we maintain a high-performing workforce and a respectful, diverse, healthy, inclusive work environment. The Talent Management Strategy we developed in 2016-2017 provides employees with growth and learning opportunities, as well as a clear path for career development.

In 2017-2018, we will implement a number of commitments from the strategy, such as focusing on technical training using E-learning tools, mobility, career development and performance and talent management tools, including formal succession planning – aligned with the government's broader efforts to build an agile workforce, ensure sound stewardship and work as one. The strategy — to be fully implemented over the next three years — will ensure that our employees have the necessary competencies and skills to help the Bureau deliver on its mandate now and in the future.

We know that a respectful, diverse healthy and inclusive work environment is important for our employees and we have taken key steps to improve workplace wellness at the Bureau. Last year, we created a Mental Health Network to help raise awareness about mental health, break down stigma and provide resources to employees. In 2017-2018, we will continue to foster that engagement through various activities and organized discussions.

Mental health matters

Given that 20 percent of Canadians will personally experience a mental health issue in their lifetime⁶, we are committed to making mental health awareness a key part of our efforts to maintain a high-performance workforce and healthy workplace.

WORKFORCE AND ENVIRONMENT OBJECTIVES

Ongoing

Implement our Talent Management Strategy

Ongoing

Improve workplace wellness including awareness of mental health

⁶ Canadian Mental Health Association. (2016). *Fast Facts about Mental Illness*. <http://www.cmha.ca/media/fast-facts-about-mental-illness/>

CONNECT WITH US

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A large, stylized blue maple leaf graphic that serves as a background for the lower half of the page. The leaf is composed of several overlapping, semi-transparent blue shapes, creating a layered effect. It is centered horizontally and occupies most of the lower two-thirds of the page.