Financial Consumer Agency of Canada
Agence de la consommation en matière financière du Canada

REVIEW OF BANKING FEES IN CANADA



Canada

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Canada

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Message from the Commissioner



Banking services are essential to the financial lives of Canadians. They enable people to manage their day-to-day finances, save for the future and participate fully in the economy.

As part of its mandate, the Financial Consumer Agency of Canada (FCAC) monitors and evaluates trends and emerging issues affecting financial consumers. We also conduct and leverage research to inform policy and legislative frameworks and to strengthen financial consumer protections. This work helps ensure that the experiences and interests of consumers remain at the centre of an increasingly complex and evolving financial marketplace.

In Budget 2025, the Government of Canada requested that FCAC examine the structure, level and transparency of fees charged by Canadian banks. *A Review of Banking Fees in Canada* (Review) responds to that request and is an important part of how FCAC delivers on our mandate. The Review advances our mission to foster trust in Canada's financial system by protecting financial consumers and empowering them to make informed decisions.

The Review provides a comprehensive assessment of common fees associated with personal bank accounts and related services. It considers differences in fees for comparable products and services, how clearly fee information is communicated, and how consumers experience these fees in practice. Its findings draw on industry data, consumer research, international experience and engagement with financial service providers and regulators.

The cost of banking is shaped not only by the level of individual fees, but also by the complexity of fee structures, consumers' banking behaviour, and the choices available to them. Greater transparency, more personalized information and fewer barriers to switching could help consumers make better-informed choices and strengthen competition. The Review also identifies areas where further examination may be warranted to better understand the impact of banking fees on financial consumers and to inform future policy considerations.

As Canada's financial marketplace continues to evolve, strong consumer protection must remain at the centre of that change. Through evidence-based research, data-driven insights and collaboration with partners, FCAC will continue to advance the interests of financial consumers and help shape a financial system that is safe, fair and strong for everyone.

Shereen Benzvy Miller
FCAC Commissioner

Executive summary

The true cost of banking is cumulative

The *Review of Banking Fees in Canada* (Review) highlights that the overall cost of banking for Canadians is driven by the cumulative effect of multiple fees that can interact, accumulate and, in some cases, compound within a single transaction. Canadians may pay fees across a range of everyday banking activities, including account maintenance, transactions, automated teller machine (ATM) access, non-sufficient funds, overdraft, foreign exchange and prepaid payment products. This raises an important question about whether certain consumers—particularly those with lower incomes, limited savings, or greater reliance on day-to-day banking services—may be disproportionately affected by these cumulative costs. While this Review does not assess differential impacts across consumer groups, the issue warrants further consideration.

A key finding of the Review is that current disclosure requirements do not always provide consumers with the information they need, when they need it, to make informed decisions. Existing requirements tend to focus on point-in-time information, such as fee schedules provided in account agreements for individual products or services, rather than a clear, consolidated view of the total fees they pay over time. As a result, consumers may not always have the information needed to make informed decisions or to compare alternatives effectively.

Consumers would benefit from increased transparency around ATM fees, foreign exchange markups, cross-border debit transactions and prepaid payment products. ATM withdrawals can involve fees charged by multiple parties at different stages of a transaction, making it difficult for consumers to understand the total cost before completing a withdrawal. Foreign exchange markups and cross-border debit fees are often embedded in exchange rates or transaction amounts, limiting consumers' ability to identify, understand and compare the true cost of these services. Prepaid payment products can also generate recurring or transaction-based fees that significantly reduce balances over time, while current disclosure requirements may not adequately support price transparency or informed decision-making.

The Review also finds that account choice and product usage can materially affect the total fees consumers pay. Consumers may incur higher costs when account features do not align with their actual banking needs, when they remain in legacy account plans that may no longer offer the best value, or when they use savings accounts for transactional purposes.

These findings point to the need for clearer, more personalized information that helps consumers understand how their own banking behaviour affects the fees they pay. Requiring federally regulated deposit-taking institutions to provide consumers with a standardized periodic statement—at least annually—summarizing cumulative fees paid on their personal deposit accounts would strengthen transparency and comparability.

Competition could be bolstered by reducing barriers to switching

Although a broad range of options are available in the market, not all consumers who could benefit from these are doing so. Fee structures are complex, and multi-product bundling can make it harder for

consumers to identify the true price of individual products or compare bundled services with standalone alternatives. Consumers may also face direct and indirect costs when switching providers, including the time and effort required to move accounts, update pre-authorized payments and re-establish financial relationships. These barriers can discourage switching, reduce competitive pressure and weaken incentives for providers to compete on price and service.

Addressing barriers to switching would support more effective consumer choice and strengthen incentives for providers to compete on price and service.

Consumer-driven banking has the potential to improve transparency and comparison shopping by giving consumers greater control over their financial data and enabling improved comparison tools. However, the Review suggests that the full benefits of consumer-driven banking will be limited unless consumers can also switch providers more easily.

Considering measures to facilitate switching alongside the implementation of consumer-driven banking could help realize these benefits. International experience, including reforms in the United Kingdom, provides additional context on approaches used to improve transparency, facilitate switching and promote competition.

Opportunities to improve consumer outcomes and competition

Prior to recent regulatory changes to cap non-sufficient funds (NSF) fees at $10 for federally regulated banks, these fees disproportionately affected financially vulnerable Canadians and exhibited characteristics commonly associated with limited competitive pressure on pricing. Similar concerns may exist for other fees, including cross-border debit fees, and may warrant further review.

About this report

Scope

This Review focuses on some of the most common fees that consumers may incur when using personal deposit accounts (e.g., chequing and savings accounts) and related services. These include account maintenance fees (also referred to as monthly fees), transaction-related fees, ATM fees, NSF fees, overdraft protection fees, and foreign currency conversion fees. In addition, the Review examines transfer-out fees for registered products, as well as fees associated with the use of prepaid payment products.

Fees associated with credit products, such as credit cards, mortgages, personal loans, or any business or commercial services, are not part of this Review.

The Review focuses on fees charged by domestic banks (Schedule I), foreign bank subsidiaries (Schedule II), federal credit unions, and companies incorporated under the *Trust and Loan Companies Act*. In this report, these financial institutions are collectively referred to as "banks," unless specified otherwise.

The fees charged by provincially incorporated credit unions and other provincially regulated financial institutions, as well as financial technology firms ("fintechs"), are described where they provide alternatives to bank products and services. The key findings of this Review apply to Canadian banks.

Methodology

This Review describes the structure and level of some of the most common fees that Canadian consumers may incur when using personal deposit accounts and related services. It focuses on the fees themselves and points to differences in fees for comparable, although not identical, products and services. FCAC recognizes that fees are only one of the factors that consumers consider when choosing financial products and services, or financial service providers.

The Review also examined the transparency of fees. That is, the clear and timely communication of information that is accessible in a manner that enables consumers to make informed decisions.

To conduct this work, FCAC:

- reviewed the relevant parts of banks' fee schedules and account agreements that relate to the fees examined, relying on this information as the main source of fee levels and key terms and conditions for the related services, and to assess how information is communicated to consumers
- collected data from banks on account volumes, deposit values, transaction volumes by transaction type, fee revenues, and the number of accounts that were charged fees for the years 2023 to 2025

- examined practices in other jurisdictions to provide context on the structure, level and transparency of select fees
- used survey data from Ipsos Canadian Financial Monitor (CFM) and Ipsos Switch to better understand consumers' account usage, product selection and switching behaviour
- conducted a series of consumer focus groups to assess how consumers experience banking fees in practice
- engaged with financial service providers operating in Canada, as well as with provincial and federal financial services regulators

Limitations

The Review is based on aggregated, industry-level data provided by all federally regulated deposit-taking institutions, supplemented by information obtained through engagement with other financial service providers and from publicly available sources. This information was used to illustrate differences in the fees associated with selected products and does not constitute an exhaustive assessment of these market segments. Comparisons are therefore limited to the fees examined and should not be interpreted as comprehensive comparisons of providers or their overall value propositions.

While these sources provided important insights into banking fees in Canada, more granular data on product features, fee structures and consumer usage patterns would enable a deeper understanding of the fees Canadians pay and their impacts. To further assess differences across products, institutions and consumer segments, FCAC may seek product-level information from banks in the future. Such data could support more detailed analysis of consumer outcomes and help identify emerging issues that may warrant closer examination.

About FCAC

FCAC plays a key role in financial consumer protection by supervising federally regulated entities, educating financial consumers about their rights and responsibilities, and strengthening financial literacy among Canadians. It derives its mandate from the *Financial Consumer Agency of Canada Act* (*FCAC Act*) and reports to Parliament through the Minister of Finance.

The *FCAC Act* sets out objectives for the Agency, including:

- to supervise regulated entities and determine whether they are complying with legislative obligations, codes of conduct, and public commitments that are overseen by FCAC
- to promote the adoption by regulated entities of policies and procedures designed to implement their market conduct obligations
- to monitor and evaluate trends and emerging issues that may have an impact on financial consumers, and to collaborate with other government agencies, regulators, and stakeholders to promote understanding among Canadians of financial services and related issues

FCAC oversees compliance with consumer protection rules under several laws, including the *Bank Act*, the *Insurance Companies Act*, the *Trust and Loan Companies Act*, and the *Payment Card Networks Act*. FCAC also oversees compliance with codes of conduct and commitments, such as the Code of Conduct for the Payment Card Industry in Canada and the Commitment on Low-Cost and No-Cost Accounts.

FCAC supervises:

- the market conduct of federally regulated financial institutions, including banks, federal credit unions, insurance companies, and trust and loan companies
- payment card network operators, which set standards for payment transactions
- the designated external complaints body under the *Bank Act*, which handles unresolved consumer complaints about banking products and services

Regulatory landscape: Dealings with customers and the public

This chapter sets out the regulatory framework governing banks' dealings with their customers and with the public,[1] including requirements related to responsible business conduct, disclosure, and the complaints process. It also briefly describes the regulatory frameworks that apply to other financial service providers, such as provincially regulated credit unions, fintechs, and payment service providers, which differ from those that apply to banks.

Responsible business conduct

Part XII.2 of the *Bank Act* and the Financial Consumer Protection Framework Regulations establish consumer protection obligations when banks, other than companies incorporated under the *Trust and Loan Companies Act*, offer or provide products and services to consumers. Companies incorporated under the *Trust and Loan Companies Act* are subject to similar consumer protection requirements in some areas. However, not every rule that applies to banks also applies to trust and loan companies.

In this Review, where a reference to a requirement under the *Bank Act* is noted, an equivalent requirement applies to companies incorporated under the *Trust and Loan Companies Act*, unless specified otherwise. These obligations support responsible business conduct, fair and equitable dealings, clear disclosure, and informed decision-making by consumers. For example, banks must:[2]

- not impose undue pressure, coerce a person, take advantage of a person, or engage in misleading practices
- not communicate or otherwise provide false or misleading information to consumers, the public, or the Commissioner of FCAC
- have policies and procedures to help ensure that products and services are appropriate for customers' needs
- ensure that compensation and incentives for officers and employees do not interfere with their ability to follow policies and procedures when offering or selling appropriate products or services

[1] The regulatory framework specific to prepaid payment products is discussed in the "Prepaid payment products" chapter of this report.
[2] The *Trust and Loan Companies Act* does not contain equivalent general requirements.

- ensure that the officers, employees, and agents involved in offering or selling products or services receive training on policies and procedures for complying with consumer-protection obligations

Before providing a product or service, banks must: [3]

- obtain the consumer's express consent (the use of a product or service does not, by itself, constitute consent)
- enter into an agreement with the consumer
- provide the consumer with a copy of the agreement, if the product or service is provided on an ongoing basis

The *Bank Act* also provides cancellation rights for certain agreements for products or services, allowing consumers to cancel within a specified period, in some cases.

Disclosure for informed decisions

The *Bank Act* establishes disclosure obligations for retail banking products and services, to support transparency and informed consumer decision-making. Clear and standardized disclosure of key information also supports effective comparisons across products and services.

Before entering into certain agreements, banks must disclose key information about the product or service, which may include applicable fees or charges, penalties, interest, cost of borrowing, features, and other terms and conditions. Disclosures must be clear, simple, and not misleading.

For certain products or services, banks must provide the customer with periodic statements or ongoing information updates, and must notify customers of certain changes, such as changes to applicable fees or charges, interest rates, or other terms and conditions.

For personal deposit accounts, banks must send the customer an electronic alert when the customer's account balance falls below $100, or below a threshold set by the customer. The alert must also indicate what the person may do to avoid fees, charges or penalties, and the time within which action must be taken.

[3] Trust and loan companies must obtain express consent before providing certain new products or services. However, they are not subject to the same general requirements as banks concerning agreements and copies of agreements for ongoing products or services.

Complaints process

Banks are required to provide consumers with an effective and timely complaint-handling process. They must deal with customer complaints within 56 days after the day on which the complaint is received.

If a complaint is not resolved to the consumer's satisfaction, or if the 56-day timeline is exceeded, consumers may escalate the matter to the Ombudsman for Banking Services and Investments (OBSI), the independent external complaints body for banking. OBSI reviews banking-related disputes and may make non-binding recommendations to resolve them.

Trust and loan companies and insurance companies must also have complaint-handling procedures. FCAC expects those procedures to be fair, accessible, and timely, although the requirements for these entities are generally less detailed than those that apply to banks.

Codes of conduct and public commitments

FCAC monitors banks' adherence to codes of conduct and public commitments, for example:

- the Commitment on Low-Cost and No-Cost Accounts
- the Code of Conduct for the Delivery of Banking Services to Seniors

Codes of conduct and public commitments complement legislation by setting out additional commitments or standards that are intended to protect the rights and interests of financial consumers in specific areas.

Other financial services providers

Consumers can also obtain financial services from providers other than banks, such as provincially regulated credit unions, fintechs and payment service providers. These providers are not subject to the consumer protection framework in the *Bank Act* described above. The requirements that apply depend on the type of provider and the services they offer and where those services are provided.

Credit unions and *caisses populaires*: Credit unions and *caisses populaires* are regulated by the province or territory in which they operate and are subject to comprehensive requirements related to business conduct, disclosure, and complaints handling. Their deposits are covered by the applicable deposit insurance regime in the province or territory in which they operate.

Fintechs and payment service providers: Fintechs and payment service providers do not fall within a single regulatory framework. The requirements that apply depend on the type of provider and the services they offer and where those services are provided. They are subject to the general consumer protection requirements in the province or territory in which they operate, however.

Payment service providers that perform retail payment activities may be subject to *the Retail Payment Activities Act* (RPAA). Payment service providers that hold end-user funds must protect and segregate those funds to ensure reliable, unhindered access in the event of provider insolvency. That said, the RPAA is not a comprehensive financial consumer protection framework, and registration as a payment service provider does not provide the same consumer protections that apply to banks under the federal Financial Consumer Protection Framework.

Fintechs and payment service providers are not members of the Canada Deposit Insurance Corporation (CDIC). CDIC deposit protection may apply to eligible deposits managed by fintechs, depending on how and where the funds are kept.

Market dynamics

For most consumers, a deposit account serves as the primary entry point into the banking system, and as the central hub for managing day-to-day finances. Deposit accounts also play a larger role in establishing and maintaining broader banking relationships, often serving as the anchor product through which consumers access additional services over time, including credit cards, loans, and mortgages.

For these reasons, this chapter examines the dynamics of the market in which these products are offered, as these dynamics have direct effects on fees.

Background

In Canada, deposit accounts are offered by regulated deposit-taking institutions:

Banks, including federal credit unions and foreign bank branches, are federally regulated under the *Bank Act*. They offer a broad range of retail and commercial financial services, including deposit accounts, lending, and payment services. Examples include Canada's 6 largest banks—Bank of Montreal (BMO), Canadian Imperial Bank of Commerce (CIBC), National Bank of Canada, Royal Bank of Canada (RBC), Scotiabank, and Toronto-Dominion Bank (TD)—collectively known as the "Big Six"; small and medium-sized banks such as Fairstone Bank; federal credit unions such as Coast Capital Savings; and digital banks such as EQ Bank and Alterna Bank.

Trust and loan companies are regulated under the *Trust and Loan Companies Act* or similar provincial legislation. They accept deposits and make loans, and may offer services similar to those of banks, sometimes with more specialized functions. Examples include Peoples Trust Company, Peace Hills Trust, and Community Trust.

Provincially regulated deposit-taking institutions, primarily credit unions and *caisses populaires*, operate under provincial legislation on a cooperative, member-owned basis. They accept deposits and provide lending and payment services. Examples include Desjardins, Vancity, and Meridian.

Fintechs such as Wealthsimple, KOHO, and Neo Financial operate through online and mobile platforms and are introducing new service models and delivery channels, forming part of the broader competitive landscape. However, since most fintechs are not regulated deposit-taking institutions, they generally cannot hold deposits directly and instead partner with regulated institutions that hold customer deposits on their behalf.

Despite this diversity, Canada's Big Six hold a dominant position in Canadian retail banking. In 2023, the Competition Bureau reported that Canada's financial services markets are concentrated, and the largest banks account for the majority of financial services provided to Canadians.

Competitive dynamics: Deposit accounts

Effective competition can encourage firms to offer lower prices, better service quality, greater choice, and more innovative products. When consumers can easily switch to a new provider, firms offer better services at lower prices to win or keep customers. This is the essence of competition.

In practice, however, Ipsos data[4] indicate that switching rates for primary chequing accounts remain relatively low, and over half of Canadians have been with their primary financial institution for 15 years or more. Furthermore, a 2024 survey from Abacus Data[5] indicates that two-thirds of Canadians had no intention of considering switching financial providers in the next 2 years.

Consumers seeking to switch financial service providers may encounter a range of practical barriers. Uncertainty about the time and effort required to initiate and complete a switch may discourage action. Consumers may also have concerns about potential payment disruptions, including the need to update direct deposits, bill payments, and pre-authorized transactions—often requiring coordination across several providers (see Annex 1: Switching costs and competition in banking).

According to Ipsos data, among consumers who switched providers in 2025, the main motivations were lower fees, promotional offers, and improved rewards or benefits. Lower fees were especially significant for consumers who switched to providers outside the Big Six, accounting for over half of such decisions.

Relationship-based pricing

A consumer's relationship with their bank often extends beyond a single deposit account. Ipsos survey evidence indicates that more than half of Big Six customers hold multiple products with their primary financial service provider—typically a chequing or savings account paired with an investment product, loan, or credit card.

Banks commonly link fee levels and discounts to the breadth of a customer's relationship with the bank—this is known as relationship-based pricing. Common examples include:

- waiving account maintenance fees for customers who maintain a minimum daily balance or hold qualifying products
- waiving credit card fees for eligible chequing account holders
- offering preferential rates on loans or mortgages to customers who maintain broader banking relationships

Relationship-based pricing can offer convenience and may appear to lower costs by rewarding consumers who hold multiple products with the same provider. However, tying discounts to a broader

[4] Ipsos. (2025). *Ipsos data indicates Wealthsimple's market penetration in Canada steadily increasing*.
[5] Abacus Data, Sheppard, E. (2024). *Redefining loyalty: Understanding Canadians' relationship with financial institutions*.

product relationship can make it harder for consumers to identify the true price of each individual product and to compare those prices with standalone alternatives.

As a result, consumers may find it difficult to judge whether the combined cost of several linked products is genuinely better value than purchasing similar products separately from different providers.

Relationship-based pricing may also create a barrier to switching, because consumers may lose discounts if they move one product to another provider, or may need to transfer several products at once to obtain a comparable lower-cost offer elsewhere.

Preference for in-person banking

Canadian consumers have increasingly adopted mobile and online channels for day-to-day banking. However, branch access continues to play a role for many consumers. According to Ipsos data, access to physical banking locations remains an important consideration for some consumers when selecting their primary financial service provider.

Digital-only banks and fintechs may offer advantages in pricing or user experience, but they often lack in-person service and support. For consumers who value access to these services, switching may be less appealing or more difficult.

Way forward

High market concentration, the prevalence of relationship-based pricing, and low switching rates may collectively limit the ability of smaller providers and new entrants to Canada's banking system to attract customers and expand their market presence. Similar concerns were identified in the United Kingdom (UK). In response, the UK implemented a series of banking and competition reforms designed to increase consumer mobility, reduce barriers to entry, and improve transparency (see Annex 2: UK regulatory history).

Alternative providers may offer lower fees and innovative products, but switching frictions can constrain the extent to which consumers take advantage of these options and, in turn, the competitive pressure these providers exert on the market.

Measures to improve product comparability and make it easier for consumers to switch financial service providers could help strengthen competition.

Disclosure approaches that reflect actual usage can provide a more complete view of the fees incurred by consumers. Disclosure tools that incorporate usage-based information may also support comparisons across products and assist consumers in assessing how account features align with their needs.

Canada's emerging consumer-driven banking framework represents an opportunity to strengthen competition (see the "consumer-driven banking box" below). By facilitating data portability, consumer-

driven banking has the potential to reduce switching frictions, improve price and product comparability, and support greater product innovation.

The federal government has recognized that persistent switching frictions continue to limit adoption of alternative financial service providers and constrain the benefits of competition.

Consumer-driven banking

Consumer-driven banking is a system that allows consumers to securely share their financial data—such as account balances, transaction history, and payment information—with participating entities through standardized and secure technology. By enabling data portability, consumer-driven banking allows consumers to use their financial information across providers for defined purposes.

The *Consumer-Driven Banking Act*, which received Royal Assent on March 26, 2026, establishes Canada's framework for safe and secure financial data sharing.

The Canadian framework will be introduced in phases, with initial implementation focused on read-only data sharing. The government has committed to bringing forward legislative amendments regarding the next phase of the framework in mid-2027.

In the first phase, consumers will be able to consent to sharing their financial data with the participating entity of their choice in a safe, secure, and standardized manner. This is expected to significantly improve consumers' ability to access accurate, timely and personalized financial tools and insights, including enhanced budgeting tools, tailored product recommendations, and more effective comparison services based on their actual behaviour.

The subsequent phase is expected to introduce read and write functionalities. Beyond allowing consumers to consent to sharing their financial data, this phase will also allow participating entities to initiate certain actions on their behalf, such as bill payments, account transfers, and the management of subscriptions and recurring transactions.

Taxonomy of retail bank fees

Deposit accounts

The account-related fees that are analyzed in this study include those associated with deposit accounts and registered products. [6]

According to the Bank of Canada, 99% of Canadians own a debit card linked to a deposit account. These accounts generally fall into 2 main categories: chequing accounts and savings accounts.

Chequing accounts are designed for everyday financial transactions, providing consumers with immediate access to funds. They include features like debit purchases, bill payments, electronic transfers, and cheque-writing privileges. Chequing accounts generally do not earn interest.

In Canada, chequing accounts offer a range of services that are grouped into an account plan. These plans generally include either a set number or unlimited use of core transactions, such as debit purchases, bill payments, Interac e-transfers, and automatic teller machine (ATM) withdrawals, as well as optional services such as overdraft protection.

Savings accounts, by contrast, are intended for holding funds that are not required for day-to-day use. These accounts typically earn interest and do not include cheque-writing privileges. Savings accounts generally impose lower limits on the number of transactions permitted before additional fees apply.

Registered products

Registered products are investment products that are given tax-deferred or tax-sheltered status by the government. Common examples include:

- Registered Retirement Savings Plans (RRSPs)
- Registered Education Savings Plans (RESPs)
- Tax-free Savings Accounts (TFSAs)
- First Home Savings Accounts (FHSAs)
- Registered Retirement Income Funds (RRIFs)

[6] Fees related prepaid payment products are discussed in the “Prepaid payment products” chapter of this report.

Unlike chequing accounts, registered products are not intended for day-to-day transactions and withdrawals, and can be subject to specific conditions, tax implications, or repayment requirements, depending on the account type.

Fees related to the use of deposit accounts or registered products

From a consumer perspective, banking fees can be categorized based on 2 key characteristics: whether they are charged to maintain access to a service (e.g., account maintenance fees) or on a per-use basis (e.g., Interac e-transfer fees). Within each of these categories, fees are either charged as fixed amounts, as is the case with non-sufficient funds (NSF) fees, or as variable charges linked to a transaction's value or account balance, as is the case with cross-border debit fees.

The fees described below do not represent an exhaustive list of all retail banking fees, and this report examines only a subset of the fees mentioned. Banks may also have other fees, depending on their product offerings. Importantly, consumers may incur multiple fees in connection with a single activity or transaction. These fees can interact, accumulate and compound, resulting in a total cost that may be significantly higher than the cost of any individual fee viewed in isolation.

Fees paid to maintain access to a service

Fees associated with maintaining an active account or ongoing access to banking services are typically charged on a monthly or annual basis. They apply regardless of transaction volume and are generally linked to the features or status of an account rather than to individual transactions. They include the following:

Account maintenance fee: Fixed, recurring fee charged to maintain an account, most commonly chequing account and, in some cases, bundled packages that include both chequing and savings accounts. This fee generally covers a defined set of services and varies in cost depending on the account plan.

Monthly overdraft protection fee: Fixed, recurring monthly fee charged to customers who have been approved for overdraft protection that provides coverage for multiple overdraft occurrences during the billing period. Interest is payable on the overdrawn amount.[7]

Safety deposit box fee: Fixed, recurring fee charged for the rental of a secure storage box within a bank branch.

Inactivity or dormant account fee: Fixed, recurring fee charged when a deposit account has no customer-initiated transactions for a specified period (typically 24 months or more).

[7] Some institutions charge monthly overdraft protection only in months in which overdraft protection is used.

Fees paid per use or per transaction

Per-use or per-transaction fees may be applied either at the time of the transaction or when an account statement is issued. These fees are typically linked either to the features of the account or to the characteristics of an individual transaction.

Account-related service fees

Paper-statement fee: Fixed fee for producing and mailing hard-copy account statements.[8]

Cheque ordering fee: Fixed fee charged for ordering cheques.[9]

Customer card replacement fee: Fixed fee charged for replacing a customer's bank card.

PIN change fee: Fixed fee charged for requesting a change to the personal identification number (PIN) on a customer's card.

Transfer-out fee: Fixed fee charged by a bank when a customer moves their account to another financial service provider.

Account closing fee: Fixed fee charged for closing a customer's account.

Transaction fees

Excess transaction fee: Fixed fee charged when a customer exceeds the number of transactions per month included in their account plan. These fees apply to transaction types specified in the account agreement once the monthly transaction limit is surpassed (e.g., the number of debits made from the account beyond the established monthly limit).

Payment services fees

Interac e-transfer fee: Fixed fee charged for sending (and, occasionally, receiving) Interac e-transfers.

Wire transfer fee: Fixed fee charged by a bank to initiate or receive an electronic funds transfer through wire networks (domestic or international) separate from any applicable foreign transaction fees.

International money-transfer fee: Fixed fee charged for allowing customers to send money to international recipients from an account online.

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[8] Additional fees may be charged for paper statements with cheque-image return.
[9] Additional fees may apply for personalized cheques.

Bill payment or bill payment reversal fee: Fixed fee charged for processing bill payments on behalf of customers and, in some cases, for cancelling or reversing payments at the customer's request.

Stop payment fee for a pre-authorized transaction: Fixed fee charged for stopping pre-authorized payments that have not already been paid or processed through the customer's account.

Unqualified or non-standard clearing fee: Fixed fee charged when payments presented for clearing fail to meet processing standards (e.g., cheques written in a currency other than the currency of the account).

Overdraft and non-sufficient funds-related fees

Pay-per-use overdraft protection fee: Fixed fee charged to customers who are approved for overdraft protection each time a debit transaction is processed despite there being insufficient funds in the account. Interest is payable on the overdrawn amount.

Linked-account overdraft protection fee: Fixed fee charged when a customer arranges in advance for funds to be transferred from a linked product (such as a savings account or line of credit) to cover transactions when their principal account has insufficient funds. A fee is typically charged for each transfer. Interest is payable where the linked product involves the extension of credit.

Non-sufficient funds (NSF) fee: Fixed fee charged when a transaction is declined because the account does not have sufficient funds to cover a cheque, pre-authorized debit, bill payment, or other withdrawal.

Automated teller machine and cash-access fees

ATM network access fee: Fixed fee charged by the consumer's bank when the consumer withdraws cash from an automated teller machine (ATM) that is not owned by that bank, including from ATMs located outside of Canada.

ATM convenience fee: Fixed fee charged by the ATM operator when a consumer uses an ATM that is not owned by the consumer's bank (this includes independent "white-label" ATMs or ATMs owned by another financial institution).

Foreign currency and cross-border fees and markup

Currency conversion markup: Markup charged for converting one currency to another. The markup is calculated as a percentage markup relative to the mid-market exchange rate and is embedded in the exchange rate paid by the consumer.

Cross-border debit fees: Separate from the currency conversion markup, banks may charge variable fees when a debit transaction is made in a currency different than the currency of the account. These fees are typically triggered when making purchases with a debit card at foreign points of sale (e.g.,

while travelling, or online with merchants located abroad) or withdrawing cash at ATMs outside of Canada. For these transactions, the bank does not conduct a currency conversion. Instead, the currency conversion is handled by the operator of the payment network used (e.g., Visa, Mastercard, Interac).

In-branch and specialty services

In-branch or teller-assisted service fee: Fixed fee charged for services requiring staff assistance, such as processing transactions at a branch counter or handling specialized requests (e.g., coin exchange).

Bank draft fee: Fixed fee for issuing a bank draft, a guaranteed form of payment backed by the issuing bank.

Cheque certification fee: Fixed fee for certifying a cheque, whereby funds are verified and set aside in the customer's account to guarantee payment.

Non-customer fee: Fixed fee charged to consumers who are not account holders when they access certain services at a bank, such as cashing a cheque.

Cheque image retrieval fee: Fixed fee charged for retrieving an electronic or physical copy of a previously processed cheque.

Fee structures and levels across financial service providers

FCAC examined the structure and level of fees across a range of Canadian financial service providers—including Big Six banks, small and medium-sized banks, digital-only banks, provincially regulated financial institutions, and fintechs—to better understand pricing strategies and variations across products. A detailed comparison is presented in Annex 10: Market scans of chequing accounts in Canada.

Select fee revenues

The revenue estimates presented in the table below come from data reported by banks and, where revenue data were not directly reported, from estimates derived using conservative assumptions based on publicly available fee schedules.

For most fee categories, revenues were estimated by multiplying the reported number of fee occurrences by representative fee amounts drawn from bank fee schedules.

For account maintenance fees, a lower bound revenue estimate was developed for basic, standard, and premium plans. The estimate is based on conservative monthly fees associated with each account plan type, as identified in fee schedules, together with assumptions regarding the number of months for which account holders may have incurred those fees over the course of the year.

Table 1. Revenue estimates by fee category (in millions of dollars)

Fee type	2023	2024	2025
NSF	$845.5	$978.5	$1,038.4
Overdraft	$189.9	$211.4	$209.6
ATM (network and convenience)	$190.3	$184.9	$170.5
Account maintenance	$440.8	$464.3	$493.0
Transactions	$373.5	$382.2	$373.5
Wire transfers	$92.9	$104.2	$95.7
Paper statements	$33.5	$31.5	$27.9
Transfer-out	$18.9	$21.4	$24.9
Inactive/Dormant accounts	$17.1	$20.7	$17.5

Revenue estimates were calculated using the following representative fee amounts: NSF ($45.00), transactions ($1.25), overdraft pay-per-use ($5.00), wire transfers ($22.50), ATM network ($2.00), ATM convenience ($3.00), paper statements ($2.00), transfer-out ($100.00), inactive or dormant accounts ($20.00).

Account maintenance fee revenue estimates were calculated using representative monthly fees of $3.95 for basic plans, $11.95 for standard plans, and $18.01 for premium plans. For each plan category, the number of accounts subject to a maintenance fee at least once during the year was estimated by subtracting the number of accounts that did not incur an account maintenance fee during the year from the total number of accounts. Annual revenue estimates were then calculated by multiplying the estimated number of accounts that were charged a maintenance fee by the representative account maintenance fee and the assumed number of months during the year.

To produce conservative lower-bound estimates, account holders with basic plans were assumed to incur maintenance fees for 12 months per year, while account holders with standard and premium plans were assumed to incur maintenance fees for 1.5 months per year. These assumptions reflect the fact that many standard and premium account holders may qualify for fee waivers by maintaining minimum daily balances or meeting other eligibility criteria.

Account maintenance fees

Background

Account maintenance fees are fixed, recurring fees that consumers pay to maintain an account—most commonly chequing accounts—or, in some cases, bundled packages that include both chequing and savings accounts. These fees generally cover a defined set of services and vary in cost depending on the account plan.

Chequing accounts offer a range of services that are grouped into an account plan. These plans generally include either a set number or unlimited use of core transactions, such as debit purchases, bill payments, Interac e-transfers, and ATM withdrawals, as well as optional services such as overdraft protection. These can generally be grouped into 3 main categories:

Basic accounts represent entry-level chequing accounts. These accounts are designed to provide basic access to everyday banking services. Basic accounts typically carry a low account maintenance fee.

Standard accounts represent the mid-tier offering. These accounts typically offer an increase in or removal of certain transaction limits. Standard accounts typically carry higher account maintenance fees than basic accounts. The fee may be waived by maintaining a minimum daily balance.

Premium accounts represent all-inclusive banking packages. These accounts include various services that would otherwise result in additional fees (e.g., safety deposit boxes, overdraft protection, fee waivers or rebates on credit cards). Premium accounts typically carry higher account maintenance fees than standard accounts. The fee may be waived by maintaining a minimum daily balance.

Digital-only banks and fintechs have emerged as providers of personal deposit accounts with alternative fee structures. Rather than relying on account maintenance fees, these institutions offer no-fee or lower fee models but may charge fees for subscription services or optional premium features such as cashback rewards, higher interest on account balances, or credit-building services (see Tables 2, 3, and 4 on the following pages).

Fee structure

Account maintenance fees vary based on the types and number of account services that are provided. These fees may be waived under promotional offers, which may be time-limited, such as discounts for students, seniors, or newcomers to Canada. In addition, banks typically waive the fee if a minimum daily balance is maintained. Depending on the bank and account tier, the minimum daily balance ranges from $500 to $6,000. If the account balance falls below this threshold, the fee waiver is forfeited, and the account maintenance fee is charged.

Some consumers remain in legacy account monthly plans. These plans are no longer available to new deposit account openings but remain in use by existing account holders. Comparisons between legacy

account monthly plans and current offerings suggest that they are often associated with higher fees, lower transaction limits, and separate charges for services that are commonly included in newer products.

Table 2. Comparison of typical account plans and maintenance fees for banks

Bank type	Basic accounts	Standard accounts	Premium accounts
Big Six banks	**Monthly account maintenance fee:** $3.95–$4.00/month **Debit transactions:** 18 per month (excess transaction fee applies after the limit) **Interac e-transfers:** Included in the monthly transaction limit **ATM:** Fees are charged for using ATMs that are not owned by the bank	**Monthly account maintenance fee:** $11.95–$17.95/month **Debit transactions:** Unlimited, some 25 per month (excess transaction fee applies after the limit) **Interac e-transfers:** Included in the monthly transaction limit **ATM**: Fees are charged for using ATMs not owned by the bank **Fee waiver**: Maintain $3,000–$4,500 minimum daily closing balance	**Monthly account maintenance fee:** $28.95–$30.95/month **Debit transactions:** Unlimited **Interac e-transfers:** Unlimited **ATM:** Some free out-of-network withdrawals **Fee waiver**: Maintain $5,000–$6,000 minimum daily closing balance **Other**: May include additional benefits (e.g., free cheques, drafts, waived or discounted credit card annual fees, access to a safety deposit box)
Small and medium-sized banks	**Monthly account maintenance fee:** $0–$5.00/month **Debit transactions:** Unlimited or up to 18 per month (excess transaction fee applies after the limit) **Interac e-transfers:** Included in the monthly transaction limit, or pay-per-use at $1.00-$1.50/Interac e-transfer **ATM:** Up to $2.50/out-of-network withdrawal	**Monthly account maintenance fee:** $7.50–$16.95/month **Debit transactions:** Unlimited, some 20–30 transactions per month (excess transaction fee applies after the limit) **Interac e-transfers:** Included in the monthly transaction limit, or 0–5 free Interac e-transfers per month	**Monthly account maintenance fee:** $16.95–$29.95/month **Debit transactions:** Unlimited **Interac e-transfers:** Unlimited **ATM:** Up to $2.50/out-of-network withdrawal, some offer 0–2 or unlimited free withdrawals **Fee waiver** (where applicable):

Bank type	Basic accounts	Standard accounts	Premium accounts
	Fee waiver (where applicable): Maintain $500-$1,500 minimum daily closing balance	**ATM:** Up to $2.50/out-of-network withdrawal **Fee waiver** (where applicable): Maintain $3,000–$6,000 minimum daily closing balance	Maintain $4,000–$6,000 minimum daily closing balance.
Digital-only banks	**Monthly account maintenance fee:** $0/month **Debit transactions:** Unlimited **Interac e-transfers:** Unlimited **ATM:** Fees are typically charged for withdrawing cash at any ATM unless the ATM is owned by the customer's bank, its affiliate, or a division thereof	N/A—digital-only banks generally only have one tier of accounts	N/A—digital-only banks generally only have one tier of accounts

FCAC examined the structure and level of fees across a range of Canadian financial service providers—including the Big Six, small and medium sized banks, digital-only banks, provincially regulated financial institutions and fintechs—to better understand pricing strategies and variations across products. A detailed comparison is presented in Annex 10: Market scans of chequing accounts in Canada.

Table 3. Comparison of typical account plans and maintenance fees for provincially regulated financial institutions and credit unions

Financial service provider type	Basic accounts	Standard accounts	Premium accounts
Provincially regulated financial institutions, credit unions and *caisses populaires*	**Monthly account maintenance fee:** $0–$6.00/month **Debit transactions:** Unlimited, some up to 60 per month (excess transaction fee applies after the limit) **Interac e-transfers:** Unlimited, some from 0–99 per month **ATM:** Fees are charged for using ATMs that are not owned by that bank **Fee waiver** (where applicable): Maintain $1,000–$2,000 minimum daily closing balance	**Monthly account maintenance fee:** $6.50–$19.25/month **Debit transactions:** Unlimited or 25–50 per month (excess transaction fee applies after the limit) **Interac e-transfers:** Unlimited, some from 0–99 per month **ATM:** Fees are charged for using ATMs that are not owned by that bank **Fee waiver** (where applicable): Maintain $1,500–$5,000 minimum daily closing balance	**Monthly account maintenance fee:** $15.00–$27.00/month **Debit transactions:** Unlimited **Interac e-transfers:** 10 per month to unlimited **ATM:** Many offer free out-of-network withdrawals, while others charge up to $2.00/withdrawal **Fee waiver** (where applicable): Maintain $5,000–$6,000 minimum daily closing balance

Table 4. Comparison of typical account plans and maintenance fees for fintechs

Financial service provider type	Basic accounts	Standard and Premium accounts
Fintechs	**Monthly account maintenance fee:** $0/month **Debit transactions:** Unlimited **Interac e-transfers:** Unlimited, or 120 for some accounts **ATM:** Free (for withdrawals at ATMs located in Canada)	**Monthly account maintenance fee:** $0–$22.00/month (for some tiered accounts) **Debit transactions:** Unlimited **Interac e-transfers:** 120 per month **ATM:** Free (for withdrawals at ATMs located in Canada) **Other**: Additional perks available (e.g., credit building, premium credit card, other promotions, and discounts)

Low-cost and no-cost bank accounts

All Canadians can open a chequing account that charges a monthly account maintenance fee of $4 or less. These products are referred to as “low-cost accounts.” Many banks offer these accounts as part of their commitment to provide basic banking services.

Banks that entered into the Commitment on Low-Cost and No-Cost Accounts offer similar accounts at no cost to any eligible individual who is:

- 18 or younger
- a student
- a senior receiving the Guaranteed Income Supplement (GIS)
- a Registered Disability Savings Plan (RDSP) beneficiary
- a newcomer to Canada (eligible during their first year)

Some banks may also offer no-cost accounts to any eligible individual who is:

- Indigenous
- a recipient of the Disability Tax Credit (DTC)
- a recipient of social assistance from eligible provincial or territorial programs

Low-cost and no-cost accounts must include at least 18 debit transactions per month. However, the types of transactions that are included can vary by institution. Consumers should contact their bank to confirm:

- which eligibility groups they recognize
- which debit transactions are included in low-cost and no-cost accounts

These accounts also include other features like no minimum balance requirement, no fees to switch accounts within the same bank, and no extra charges for deposits, debit card, and pre-authorized payment forms. For more information, please see the Commitment on Low-Cost and No-Cost Accounts.

Disclosure

Banks are required to disclose all applicable fees in account agreements. Information related to the maintenance fees and services that are included is disclosed as part of the broader account agreement and fee schedule. For deposit accounts, banks are required to notify customers of changes to certain fees and to provide periodic statements. Some banks also provide their customers with access to tools and information to help them monitor their accounts, track transactions and fees, and manage their finances.

These disclosure requirements are intended to ensure that consumers are informed of the fees and services associated with different account plans, so that they can compare plans and find the best fit based on their banking needs.

Key findings and implications

Key finding 1: Misalignment between account features and usage can increase costs

Account maintenance fees vary depending on the type of financial service provider and the range and level of services included in the account plan.

Selecting an account with multiple features can be complex. Consumers are not simply comparing a single fee, but also account plans with varying features, limits and conditions. Consumers who maintain higher-tier accounts but use only a limited subset of features may pay for services they do not need, while others may incur additional fees by exceeding the limits of lower-tier accounts. For example, access to branch services and ATM networks may justify higher monthly fees for some consumers but offer limited value for those who bank online.

Usage patterns may evolve over time

The cost-effectiveness of a deposit account depends on how well its features align with a consumer's usage pattern. However, usage patterns can evolve over time, and consumers may select an account plan that fits their needs at one point but not revisit that choice as circumstances change. When asked why they use their main financial institution, over 1 in 4 Ipsos survey respondents answered, "It's the bank I've always had; I've never bothered to change it."

Reassessment can improve outcomes

Adjusting account type or switching providers may reduce overall costs and better align products with individual needs.

Consumers may lack information (e.g., tools, resources, etc.) to compare products across financial service providers

New tools and policy measures may be needed to bridge this gap to shift from static, generic disclosures toward dynamic, personalized, and usage-based insights. Other opportunities to enhance transparency are discussed in the "Transparency" chapter of this report.

Illustrative consumer scenario: Sara's story

A few years ago, Sara frequently travelled for work and preferred dealing with a teller for certain banking activities. She selected a premium chequing account at $30.95/month, which offered unlimited transactions, access to in-branch services, and rebates on a travel credit card. Although her maintenance fee can be waived by maintaining a $6,000 balance, she occasionally fails to keep sufficient funds in her account.

Today, while Sara still makes the same number of transactions each month, some of her needs have changed: she now works remotely, travels rarely, and manages her finances from her phone. Without reassessing whether her account features align with her current usage, she will continue to incur fees for services she no longer needs. Sara may be able to reduce her fees by switching to a different account.

Account feature/usage	Current: Big Six premium account	Alternative: Current-bank unlimited account	Alternative: No-fee digital account
Monthly account fee	$30.95	$17.95	$0.00
Branch access	Yes	Yes	No
Rebate on travel credit card	Yes	Yes	No
Monthly debit transactions included	Unlimited	Unlimited	Unlimited
Monthly debit transactions made	30	30	30
Minimum daily balance to waive the maintenance fee	$6,000	$4,000	N/A
Annual months in which the minimum daily balance is not maintained	6	6	N/A
Total annual cost	$185.70	$107.70	$0.00

Key finding 2: Fee waivers with a minimum daily balance can reduce banking costs, but may also involve hidden trade-offs

Fee waivers with a minimum daily balance can reduce the cost of banking for some consumers and can provide access to bundled services and benefits that might otherwise have to be purchased separately. However, the financial benefit depends on the consumer's ability to consistently maintain the required balance and the alternative uses of those funds. If the account balance falls below the threshold—even by $1—the fee waiver is forfeited, and the account maintenance fee is charged.

Holding funds in an account to meet minimum daily balance requirements also involves opportunity costs, since those funds could be used for other purposes that could yield greater financial benefits. For example, instead of holding $4,000 in a low- or no-interest chequing account, those funds could be used to:

- **Pay down debt:** With a 21.99% interest rate on a credit card, this could reduce interest charges by approximately $974 over one year
- **Generate investment returns:** At an interest rate of 2%, this would yield about $80 over one year

Table 5. Monthly interest that could have been earned at different annual interest rates

Minimum daily balance held	Monthly interest lost @ 1.0%	Monthly interest lost @ 2.0%	Monthly interest lost @ 3.0%
$3,000	$2.50	$5.00	$7.50
$4,000	$3.33	$6.67	$10.00
$5,000	$4.17	$8.33	$12.50
$6,000	$5.00	$10.00	$15.00

Table 6. Monthly debt interest that could have been avoided at different annual interest rates

Minimum daily balance held	Monthly debt interest @ 9.99%	Monthly debt interest @ 13.99%	Monthly debt interest @ 21.99%
$3,000	$26.15	$37.31	$60.87
$4,000	$34.87	$49.74	$81.16
$5,000	$43.58	$62.18	$101.45
$6,000	$52.30	$74.62	$121.73

The calculations in the table above assume that interest is calculated daily but charged monthly. For illustrative purposes, annual interest charges over one year were divided by 12 to estimate average monthly values. These estimates do not consider multi-year compounding.

Consumers who are unable to consistently maintain minimum daily balance requirements and/or who face opportunity costs from holding idle funds may benefit from considering alternative financial

service providers that offer comparable lower-cost account plans with interest-bearing accounts. Depending on the consumer's needs and usage, the value of the waived fee and included benefits may equal or exceed the generated investment returns or the debt avoided.

Excess transaction fees

Background

Debit transactions are transactions that reduce the balance of a deposit account. They include cash withdrawals, bill payments, cheque payments, Interac e-transfers, and in-store or online debit purchases.

Consumers can make debit transactions through a variety of channels, including at bank branches, at ATMs, and through mobile, online or telephone banking.

Deposit accounts typically include either a set limit of monthly debit transactions or unlimited transactions. If consumers exceed the number of transactions per month included in their account plan, excess transaction fees apply.

Fee structure

For chequing accounts, monthly transaction limits vary by account type. Among branch-based banks:

- **Basic accounts** generally include 12 to 18 transactions free of charge
- **Standard accounts** typically include at least 25 transactions free of charge
- **Premium accounts** generally include an unlimited number of transactions

Digital banks and fintechs typically offer an unlimited number of transactions across their entire account offerings.

Compared to chequing accounts, savings accounts typically include fewer transactions free of charge and impose higher fees for excess transactions.

Table 7. Typical transaction limits and excess transaction fees at branch-based banks

Account type	Typical transaction limit	Typical excess transaction fee
Basic chequing	12–18	$1.25
Standard chequing	25, or unlimited	$1.25
Premium chequing	Unlimited	N/A
Savings	0–2	$5.00

Excess transaction fees

Among branch-based banks, excess transaction fees are generally assessed on a per-transaction basis and are typically $1.25 per transaction. Savings accounts typically impose higher excess transaction fees, often $5 per transaction. Accounts that offer unlimited transactions do not charge excess transaction fees.

Digital banks and fintechs do not charge excess transaction fees, as their products are structured without fixed transaction limits.

Interac e-transfer fees

An Interac e-transfer is an electronic payment service that allows individuals to send or receive money directly between bank accounts in Canada using online or mobile banking.

Interac e-transfers are typically included within the transaction limit associated with the account plan. However, exceptions remain:

- Deposit accounts with no included transactions treat each Interac e-transfer as an individual transaction and apply charges accordingly
- Some account plans apply separate monthly limits for Interac e-transfers in addition to overall transaction limits, and charges apply when either or both limits are exceeded
- Legacy account plans may continue to charge separate Interac e-transfer fees even where newer account offerings include them at no additional cost

Financial service providers set maximum amounts that can be transferred daily, weekly, and monthly by Interac e-transfer (see Table 8). Among Big Six banks, daily limits are typically in the range of $3,000–$10,000, while small and medium-sized banks and fintechs permit significantly higher transfer amounts. Consumers who need to transfer amounts above these limits may be required to use multiple transactions that count towards their monthly limit, or to use alternative transfer services (e.g., wire transfers) that carry additional fees.

Table 8. Typical Interac e-transfer limits by type of financial service provider

Institution type	Daily limit	Weekly limit	Monthly limit
Big Six banks	$3,000–$10,000	$10,000–$14,000	$20,000–$30,000
Small and medium-sized banks	$3,000–$10,000	$10,000–$20,000	$20,000–$50,000
Digital-only banks	$3,000–$5,000	$10,000–$20,000	$20,000–$50,000
Fintechs	$5,000–$50,000	$10,000–$100,000	$20,000–$250,000

Self-serve and full-service transactions

Some account plans distinguish between self-serve and full-service transactions. Self-serve transactions generally include activities conducted through digital channels or ATMs, while full-service transactions involve assistance from branch staff.

Certain account plans impose separate limits on full-service transactions in addition to overall monthly transaction limits. As a result, a single transaction could count toward multiple limits and trigger more than one fee.

For example, a branch-assisted cash withdrawal could count toward both the overall monthly transaction limit and the account plan's full-service transaction limit, triggering separate fees if both limits have been exceeded.

Disclosure

Banks are required to disclose all applicable fees in account agreements. Information related to excess transaction fees is disclosed as part of the broader account agreement and fee schedule. The disclosure of transaction limits and excess transaction fees is intended to ensure that consumers are informed of the applicable charges before making transactions.

Excess transaction fees are typically assessed at the end of the billing cycle based on total monthly usage and are disclosed on the customer's monthly account statement.

Key findings and implications

Key finding 3: It may be difficult for consumers to avoid paying excess transaction fees without a way to monitor transaction usage.

Consumers may find it difficult to monitor their transaction usage throughout the billing cycle and to anticipate when excess transaction fees will be charged. Industry data indicate that some consumers incur significant excess transaction fees, which suggests that they could reduce their total banking fees by switching to a more expensive plan that includes more transactions.

Excess transaction fees depend on cumulative account activity over the billing cycle. Given current requirements:

- Excess transaction fees are assessed after they have already been incurred
- Banks are not required to notify consumers when they are approaching or have exceeded their transaction limits

As a result, consumers may only become aware that excess transaction fees have been charged after the end of the billing period.

Existing disclosure requirements (e.g., low-balance alerts) could be adapted to provide timely notifications when consumers are nearing their transaction limits or incurring excess transaction fees. Repeated reminders would increase the salience of these costs and may prompt consumers to reassess their account usage or consider alternative options that better align with their needs.

Other opportunities to enhance transparency are discussed in the "Transparency" chapter of this report.

Key finding 4: Legacy account plans may result in higher costs for common banking activities

Approximately 10% of consumers remain in legacy account monthly plans. These plans are no longer available to new deposit account openings but remain in use by existing account holders.

Comparisons with current offerings suggest that legacy account monthly plans are typically associated with higher fees, lower transaction limits, and separate charges for services that are commonly included in newer products.

A notable example is Interac e-transfer pricing. While most current account plans include Interac e-transfers within the monthly transaction allowance, many legacy plans continue to impose separate Interac e-transfer fees. As of 2025, consumers who incur Interac e-transfer fees are most often using legacy account plans.

Consumers have increasingly adopted mobile and online channels for day-to-day banking. For example, online transfers—which in Canada consist almost exclusively of Interac e-transfer transactions—tripled between 2017 and 2022. [10]

As transaction usage patterns evolve over time, a legacy account plan may no longer align with a consumer's needs. Consumers should review their account plans to assess whether newer options better fit their needs, or whether their legacy plans continue to offer better value.

[10] Prairie Payments Joint Venture. (2023, November 2). *Massive growth in online and electronic transfers show Canadians embracing modern payments*.

Illustrative consumer scenario: Robert's story

Robert opened his chequing account at a Big Six bank back in 2009 when he started his first full-time job. At the time, the account plan worked well with his needs, and over the past 17 years he has never revisited his choice.

However, both Robert's banking habits and the market have evolved. He now makes approximately 4 Interac e-transfers per month and about 15 other transactions, reflecting a shift toward more frequent digital payments. During this time, his bank introduced newer account options with lower maintenance fees and Interac e-transfers included within the transaction allowance.

As a result, without changing how he banks, Robert could save $134.40 per year simply by switching from his legacy plan to a current offering better aligned with his usage pattern.

Feature	Legacy plan	Modern plan
Monthly maintenance fee	$11.95	$4.00
Transactions included	25	18
Interac e-transfers included	1	Included in transaction limit
Fee per excess Interac e-transfer	$1.50	N/A
Excess transaction fee	$1.25	$1.25
Robert's 4 e-transfers	3 excess transactions × $1.50 = $4.50	Counted in transaction limit —no extra charge
Robert's 15 other transactions	Within limit—no extra charge	1 excess × $1.25 = $1.25
Total monthly cost	$16.45	$5.25
Total annual cost	$197.40	$63.00

Key finding 5: Consumers using savings accounts for transactions often incur avoidable fees

Savings accounts are designed primarily for holding funds and earning interest. Compared with chequing accounts, they typically include lower transaction limits and impose higher excess transaction fees. As a result, consumers who use savings accounts for day-to-day transactions may incur higher costs than those conducting similar transactions through chequing accounts.

Industry data suggest that some consumers use savings accounts in ways that are not aligned with the account's intended purpose or pricing structure.

In many cases, savings account transaction fees can be avoided. Consumers can transfer funds between their chequing and savings accounts held at the same bank, and these transfers generally do not count toward transaction limits or trigger excess transaction fees. As a result, consumers can retain funds in savings accounts and transfer money to their chequing account as needed for day-to-day transactions, which can help them avoid incurring additional fees.

Illustrative consumer scenario: Yasmin's story

Yasmin, a young customer, has 2 accounts with a Big Six bank:

- a basic chequing account that includes 18 transactions per month
- a savings account that includes 1 free transaction per month, with a $5.00 fee charged for each additional transaction

Like many younger consumers, Yasmin relies heavily on debit for everyday purchases. One afternoon at a store, she taps her debit card and inadvertently selects her savings account instead of her chequing account on the payment terminal. She doesn't notice—the payment goes through normally.

Over the rest of the month, this happens a few more times without her noticing. At the end of the month, Yasmin reviews her statement and realizes that multiple transactions were processed through her savings account, including $15 she incurred in fees.

Transaction routing	Intended outcome (all transactions processed through chequing account)	Actual outcome (transactions processed through savings account in error)
Chequing — transactions made	14	10
Chequing — transactions included	18	18
Chequing — excess transaction fees	$0.00	$0.00
Savings — transactions made	0	4
Savings — transactions included	1	1
Savings — excess transaction fees	$0.00	3 × $5.00 = $15.00
Total fees for the month	$0.00	$15.00
Annual impact (if recurring)	$0.00	$180.00 per year

Key finding 6: Consumers continue to incur excess transaction fees

Digital banks and fintechs offer deposit accounts with alternative fee structures. Some digital-only banks and some fintechs offer lower-cost unlimited accounts that do not require consumers to hold funds to meet minimum daily balance requirements. Despite the availability of these lower-cost alternatives, many consumers continue to incur excess transaction fees and maintain account plans with transaction limits that may not align with their banking needs. As a result, they may not fully benefit from available opportunities to reduce banking costs.

Table 9. Optimizing costs when holding a single account only

Feature	Option 1: Unlimited account with a branch-based bank	Option 2: Unlimited account with a digital bank	Option 3: Unlimited account with a fintech
Unlimited transactions	Yes	Yes	Yes
Branch access	Yes	No	No
Maintenance fee	$16.95–$30.95[1]	$0	$0
Total fees for the year	$203.40–$371.40	$0	$0

[1] Consumers who maintain a minimum daily balance could pay an opportunity cost instead. Unlimited accounts may include other benefits, not shown here, which could affect the optimal strategy.

Switching to a digital-only bank or fintech can help reduce fees. However, this option may be less appealing to consumers who value branch access or other benefits associated with branch-based banks' unlimited accounts.

Table 10. Optimizing costs when holding a deposit account at multiple financial service providers

Feature	Option 1: Unlimited account with a branch-based bank	Option 2: Basic account with a branch-based bank combined with an unlimited account with a digital bank or fintech
Unlimited transactions	Yes	Yes
Branch access	Yes	Yes
Maintenance fee	$16.95–$30.95[1]	$3.95
Total fees for the year	$203.40–$371.40	$47.40

[1] Consumers who maintain a minimum daily balance could have the maintenance fee waived but could pay an opportunity cost instead. Unlimited accounts may include other benefits, not shown here, which could affect the optimal strategy.

Depending on their needs and preferences, some consumers may choose to use a combination of accounts, such as a basic account that provides branch access alongside a no-fee digital account for day-to-day transactions.

ATM fees

Background

Automated teller machines (ATMs) offer self-serve around-the-clock access to cash and basic banking services. Depending on the machine and who owns it, consumers may also be able to deposit or transfer funds, pay bills, or check their account balances (see Annex 3: Demand for cash and Canada's ATM network).

The range of services available at an ATM depends largely on who owns and operates the ATM being used, and on where the machine is located.

ATMs that are owned by a financial institution and located at a branch offer the institution's customers a full suite of services, including cash withdrawals, deposits, transfers, bill payments, and balance inquiries. Services for non-customers are generally limited to cash withdrawals.

ATMs that are owned by a financial institution but not located at a branch offer similar services to the institution's customers, with the exception of deposit-taking. Services for non-customers are generally limited to cash withdrawals.

Privately owned and operated white-label ATMs generally provide consumers with cash withdrawal services only.

According to data from the Bank of Canada, the Canadian ATM network is comprised of approximately 60,000 ATMs, of which about 18,000 (or roughly 30%) are bank-owned. Some digital-only financial institutions have proprietary ATMS while others rely instead on the ATMs owned by other financial institutions and independent ATM operators.

The principal shared network that links ATMs across Canada is operated by Interac, a privately owned corporation governed by Canada's major financial institutions. [11] Interac routes transaction requests (e.g., cash withdrawals and balance enquiries) between the ATMs and consumers' banks.

Fee structure

ATM withdrawals usually count toward the number of transactions included in a consumer's account plan. If a consumer exceeds their monthly transaction limit, excess transaction fees apply, increasing the cost of withdrawals.

[11] Interac's shareholders are a diverse body of financial services entities, including banks, credit unions, *caisses populaires*, and payment acquirers.

Cash withdrawals made at ATMs owned by the consumer's bank are typically included in the account plan at no charge.

When consumers use ATMs that are not owned by their bank, fees apply. ATM fees are typically charged on a per-transaction basis (e.g., per withdrawal). Consumers can incur multiple fees during a single ATM transaction, including:

ATM network access fee: Fixed fee charged by the consumer's bank when the consumer withdraws cash from an ATM that is not owned by that bank. Fees charged to withdraw cash at an ATM outside of Canada are typically higher. Network access fees are not disclosed to the consumer during the transaction through an on-screen message.

ATM convenience fee: Fixed fee charged by the ATM operator when a consumer uses an ATM that is not owned by the consumer's bank (this includes independent white-label ATMs or ATMs owned by another financial institution). Convenience fees are disclosed to the consumer during the transaction through an on-screen message and are included in the total amount withdrawn.

Cross-border debit fee: Variable fee charged by the consumer's bank for ATM withdrawals made outside Canada. This fee is calculated as a percentage of the Canadian-dollar amount after conversion of foreign currency amount at the rate set by the payment network used. The cross-border debit fee is applied to the total amount withdrawn, including the ATM convenience fee charged by the operator of the ATM outside of Canada.

Table 11. Type and range of ATM fees

Type	Range
Network access fee	ATM in Canada: $0–$2.00 per transaction ATM outside of Canada: $0–$5.00 per transaction
Convenience fee	$0–$7.50 per transaction
Cross-border debit fee	Up to 3.5% of the total amount withdrawn, including the added convenience fee

Depending on the terms of the consumer's account agreement, some banks and fintechs may reimburse certain fees charged by third-party ATM operators.

Costs vary by ATM ownership and financial product provider

Table 12. Typical cost of ATM withdrawals by ATM ownership and financial service provider

Fee	Branch-based banks		Online providers	
	ATM owned by the consumer's bank	ATM that is not owned by the consumer's bank	Digital banks[1]	Fintechs
Network access fee	N/A	$0–$2.00	$0–$1.50	N/A
Convenience fee[2]	N/A	$3.00–$7.50	$0–$7.50	$0–$7.50
Excess-transaction fee	$0–$1.25	$0–$1.25	N/A	N/A
Total transaction cost for the consumer	$0–$1.25	$3.00–$10.75	$0–$9.00	$0–$7.50

[1] Some digital-only banks have proprietary ATMs where customers can withdraw for free (e.g., Manulife Bank, Simplii, Tangerine).
[2] Some digital banks and fintechs reimburse consumers for up to $5.00 in convenience fees.

Disclosure

Banks are required to disclose all applicable fees in account agreements. Information related to ATM fees charged by the consumer's own bank is disclosed as part of the broader account agreement and fee schedule. For ATM-related fees, these disclosure requirements are intended to ensure that consumers are informed of applicable charges before completing an ATM transaction and do not incur fees that were not disclosed.

International practices

In the United States, consumers who withdraw cash at an ATM owned by another financial institution or white-label operator typically face 2 separate charges: a convenience fee set by the ATM operator, and a network access fee charged by their own financial institution. Under U.S. federal regulations, all ATM fees must be disclosed to consumers before the transaction is completed, and consumers must actively consent to proceed.

In the UK, most cash withdrawals and cash deposits across the LINK network are free to use for cardholders using a debit card issued by one of their members. LINK allows both free-to-use and pay-to-use transactions on their networks, with free-to-use ATMs funded directly by card-issuing banks and building societies through interchange fees. Any ATM operator wanting to deploy cash machines must join LINK as a member.

A small number of ATM operators charge convenience fees to consumers for cash withdrawals. UK rules do not allow double charging; that is, an operator can either charge consumers directly to use

their ATM or can claim an interchange fee from the card issuer, but they cannot do both. Fees must be clearly disclosed on screen, and fee-charging ATMs must also display external signage stating that a fee applies.

By contrast, Canada does not have legislative requirements requiring on-screen ATM fee disclosure. Instead, disclosure is governed by general fee-disclosure requirements under the Financial Consumer Protection Framework, as well as by Interac network access rules that permit ATM convenience fees only when they are disclosed on screen at the time of cash withdrawal.

Key findings and implications

Transparency

In practice, ATM fee disclosure at the time of cash withdrawal is fragmented across multiple sources. Consumers do not receive a single, consolidated view of the full transaction cost before confirming a withdrawal.

Account-level fees—such as network access fees and excess-transaction fees—are disclosed in account agreements and fee schedules provided by the consumer's bank.

ATM convenience fees are disclosed separately by ATM operators through on-screen messages.

Account plans with "unlimited transactions" do not necessarily mean that all ATM withdrawals are free, depending on the type of ATM used and the account's terms. Consumers may still incur convenience fees when using an ATM owned by a third-party operator.

Key finding 7: Consumers may not know the total cost of an ATM withdrawal before completing the transaction

Even when each fee is disclosed separately, consumers may not anticipate that multiple charges can apply to a single ATM withdrawal or understand how their usage patterns affect its total cost. As a result, they may have difficulty determining, before completing a transaction, the total amount they will pay, how that amount is calculated, and which party charges each fee.

Key finding 8: Stacking of ATM fees can increase the cost of withdrawing cash

ATM fees are a cost of accessing cash and can vary significantly depending on how and where a withdrawal is made. The impact of ATM fees is not uniform for consumers.

When consumers use an ATM operated by another bank or a white-label operator, they may incur both a network access fee charged by their own bank and a convenience fee charged by the ATM operator.

Consumers in rural or remote areas, as well as those in urban neighbourhoods with a high concentration of independent or white-label ATMs, have few lower-cost options for withdrawing cash.

Those who rely more heavily on cash—whether due to personal circumstances, payment preferences, or limited access to digital alternatives—and who must use ATMs frequently are less able to avoid these charges. These users are also more likely to incur account-level transaction fees when ATM withdrawals exceed the transaction limits included in their account plan.

Illustrative consumer scenario: Ayden's story

Ayden needs $20 in cash to buy food at a local fair. There are 3 ATMs within walking distance, but the fees vary considerably depending on which one he chooses.

For the same $20 withdrawal, using an ATM that is not operated by his bank could cost him more than 8 times more in fees.

	Option 1: $20 withdrawal at an ATM owned by Ayden's bank	Option 2: $20 withdrawal at an ATM owned by another bank	Option 3: $20 withdrawal at a white-label ATM
Ayden's bank charges a network access fee when he uses an ATM that is not owned by his bank	N/A	$2.00	$2.00
The convenience fee collected by the owner of the ATM is added to the total fees	N/A	$3.50	$7.50
Ayden's bank charges an excess transaction fee since he exceeded his total debit transaction limit for the month	$1.25	$1.25	$1.25
Total fees debited from the consumer's account (CAD)	$1.25	$6.75	$10.75

NSF fees

Background

Non-sufficient funds (NSF) fees are charged by banks when a transaction is declined because the account does not have overdraft protection and does not have sufficient funds to cover a cheque, pre-authorized debit, bill payment, or other withdrawal.

In 2025, NSF fees are estimated to have exceeded $1 billion in charges, making them the largest consumer cost among the account service charges for which data were collected.

Since March 2026, the Financial Consumer Protection Framework Regulations require that NSF fees charged by banks for personal deposit accounts:

- be capped at $10
- not be applied if an NSF was applied in the previous 2 business days, or if the account shortfall is less than $10

In addition to NSF fees, a declined transaction can result in payees (e.g., merchants, property owners, utilities, lenders, or government bodies, etc.) charging consumers “dishonoured-payment fees” to recover costs associated with failed or returned payments. Merchants typically charge dishonoured-payment fees in the range of $20 to $40 per declined transaction.

Dishonoured-payment fees are subject to a mix of federal and provincial rules:

- They are capped at $25 for all federal government departments under the federal Interest and Administrative Charges Regulations.
- The federal Criminal Interest Rate Regulations impose a nationwide cap of $20 on dishonoured-payment fees charged by payday lenders.
- Quebec generally limits dishonoured-payment fees charged by payees to the recovery of actual bank charges that they pay.

International benchmarks

Analysis by the U.S. Consumer Financial Protection Bureau (CFPB) suggests that the level of NSF fees is not closely aligned with the underlying costs incurred by financial service providers.

Given the high degree of automation in electronic payment systems, the marginal cost of processing an NSF transaction is estimated to be relatively low. Rather than reflecting the cost of recovery, NSF fees function primarily as a behavioural incentive, intended to encourage consumers to maintain sufficient account balances to meet their payment obligations.

In 2021, the CFPB issued requirements for large banks to report NSF fee revenues. The banks responded by eliminating NSF fees. The CFPB estimated that by 2023, 97% of NSF fee revenues among banks with over $10 billion in assets had been eliminated, generating nearly $2 billion in ongoing annual consumer savings.

In the UK, NSF fees—referred to as “refused payments”—declined after the Financial Conduct Authority (FCA) issued updated guidance in 2019. The guidance clarified that these fees should reasonably reflect the actual cost of refusing a payment, prompting many banks to reduce or eliminate them.

Fee structure

Before regulatory changes took effect in March 2026, Canadian banks charged NSF fees of approximately $45 to $48 per occurrence. Banks varied in how they treated repeated payment attempts, with some charging a separate NSF fee each time a transaction was retried, leading to multiple fees from a single failed payment.

New federal regulations cap NSF fees at $10 and prohibit banks from charging more than one NSF fee within a two-business-day period for the same personal deposit account, regardless of how many times a merchant or payee attempts to process the same payment.

Most fintechs do not charge NSF fees. Instead, they decline transactions when an account has insufficient funds.

Disclosure

Banks are required to disclose all applicable fees in account agreements. Information about NSF fees, including the amount charged and the circumstances in which the fee may apply, appears in the account agreement and fee schedule. These disclosure requirements are intended to ensure that consumers are informed of potential charges and do not incur fees that were not disclosed.

For personal deposit accounts, banks must send customers an electronic alert when their account balance falls below $100 (by default, or below a threshold amount the customer has set). The alert must also explain what customers can do to avoid fees and how much time they have to act.

Key finding and implications

Key finding 9: Usage-based, personalized disclosure would improve transparency of NSF fees

NSF fees are disclosed in account agreements and fee schedules, while electronic alerts provide consumers with more timely, personalized information that can help them manage their accounts and avoid fees, for example, by adding funds, delaying a payment or choosing another payment method.

Transparency related to NSF fees raises challenges with respect to consumers' ability to assess the cumulative cost of these fees over time. Consumers may find it difficult to track their transaction patterns, making it harder to assess the total amount they pay in NSF fees over time and determine which account or account features align best with their needs.

There may be opportunities to help address these challenges and support more informed consumer decision-making. Opportunities to improve transparency are described in the "Transparency" chapter of this report.

Overdraft protection fees

Background

An overdraft occurs when a bank allows a debit transaction to proceed despite there being insufficient funds in a consumer's account to cover the transaction. Consumers must be approved before banks extend short-term credit through overdraft protection. Overdrawn amounts must be repaid with applicable interest and overdraft fees. Overdraft differs from NSF, which occurs when a balance shortfall causes a transaction to be declined.

Banks generally offer overdraft protection in 3 different ways:

Monthly overdraft protection: Fixed, recurring monthly fee charged to customers who are approved for overdraft protection that provides coverage for multiple overdraft occurrences during the billing period. Interest is payable on the overdrawn amount.[12]

Pay-per-use overdraft protection fee: Fixed fee charged to customers w customers who are approved for overdraft protection each time a debit transaction is processed despite there being insufficient funds in the account. Interest is payable on the overdrawn amount.

Linked-account overdraft protection fee: Fixed fee charged when a customer arranges in advance for funds to be transferred from a linked product (such as a savings account or line of credit) to cover transactions when their principal account has insufficient funds. A fee is typically charged for each transfer. Interest is payable where the linked product involves the extension of credit.

Fee structure

Overdraft protection fees are treated as a form of interest under federal law. Section 347 of the Criminal Code sets the criminal interest rate in Canada as any annual percentage rate exceeding 35%. The Criminal Code defines "interest" broadly, capturing not only traditional interest charges, but also certain fees and charges associated with the extension of credit, including overdraft charges. It effectively sets the maximum amount of overdraft that can be charged by banks to $5.

Consumers may incur one or more of the following charges when they go into overdraft:

- overdraft protection fees (monthly or pay-per-use)
- interest on the overdrawn balance

[12] Some institutions charge monthly overdraft protection only in months in which overdraft protection is used.

Most banks charge $5 per month for overdraft protection plans and $5 per transaction for pay-per-use overdraft protection. Where coverage is offered through a linked account, banks typically charge a $5 fee per transfer.

Overdraft protection practices vary across the industry.[13] For example, some banks waive the monthly overdraft protection fee in months when the overdraft is not used, while others charge it regardless of usage.

Under the pay-per-use model, some banks charge an overdraft protection fee each time an account is overdrawn, while others charge it only once per day, even if multiple overdraft transactions occur. Many banks also waive overdraft protection fees for certain account types, such as student or senior accounts, or as part of premium account packages.

Canada's banks apply an annual interest rate in the range of about 19% to 22% on overdrawn amounts, calculated daily and charged monthly. Most banks also require that the overdraft balance be repaid within a specified period (e.g., 89 days).

Some alternative financial service providers such as fintechs allow accounts to go into negative balance for a short period of time (e.g., 5 days) or if the account is linked to a form of credit. For example, KOHO Financial offers linked account overdraft through a no-interest line of credit with a typical limit of $225.

Disclosure

Banks are required to disclose all applicable fees in account agreements. Information related to overdraft fees is disclosed as part of the broader account agreement and fee schedule. Banks are required to disclose overdraft protection fees, including their structure, when they apply, along with any associated interest charges. These disclosure requirements are intended to ensure that consumers are informed of potential charges and do not incur fees that were not disclosed.

For personal deposit accounts, banks must send the customer an electronic alert when the customer's account balance falls below $100, or below a threshold set by the customer. The alert must also indicate what the person may do to avoid fees and the time within which action must be taken.

Key findings and implications

Key finding 10: Usage-based, personalized disclosure would improve transparency of overdraft protection fees

Banks are required to disclose all applicable fees in account agreements. For deposit accounts, banks are required to notify customers of changes to certain fees and to provide periodic statements. Some

[13] Some banks do not offer overdraft protection or charge related fees. In these cases, transactions that exceed the available balance are declined.

banks also provide their customers with access to tools and information to help them monitor their accounts, track transactions and fees, and manage their finances.

Consumers may have low visibility on usage patterns, limiting their ability to understand when fees will be applied, compare products based on cost, and take steps to reduce total charges.

Transparency related to overdraft fees raises challenges with respect to consumers' ability to assess the cumulative cost of these fees over time. In practice, consumers may incur fixed overdraft protection fees in months with no overdraft usage, or multiple pay-per-use fees when several transactions are processed while an account remains overdrawn. Consumers may find it difficult to track their transactions, making it harder to assess which account features align best with their needs.

Transparency could be further enhanced with a statement from banks that would support an assessment of product fit, including through like-for-like comparisons and, where available, information on alternative account options offered by the same bank. Improvements to disclosure requirements could help address these challenges and support more informed consumer decision-making. Opportunities to improve transparency are described in the "Transparency" chapter of this report.

Key finding 11: Overdraft protection can be a lower-cost alternative for consumers who experience dishonoured payments

For consumers who occasionally incur NSF fees, overdraft protection may be a lower-cost option, particularly when NSF fees are combined with charges related to declined transactions or dishonoured payments.

For example, a monthly overdraft protection fee may be less expensive than a declined transaction that triggers a $10 NSF fee and dishonoured-payment fees imposed by merchants (often $20–$40 per NSF transaction), even after accounting for interest on a small, short-term overdraft balance.

Illustrative consumer scenario: Nadine's story

Nadine has $30 in her chequing account when a $50 pre-authorized payment for her mobile phone bill is due. Near the end of the month, a $495 pre-authorized vehicle payment is due, but she will not have a sufficient balance in her account to cover this expense until she receives her second $500 paycheque.

The following 3 options show how different forms of overdraft protection could affect the fees Nadine pays:

- **No overdraft protection:** Both transactions are declined, triggering NSF fees from her bank and dishonoured-payment fees from her mobile provider.
- **Monthly overdraft protection ($5/month, 22% annual interest):** Both transactions go through, but Nadine pays a monthly fee plus interest on the overdrawn balances.
- **Pay-per-use overdraft protection ($5/occurrence, 22% annual interest):** Both transactions go through, but Nadine pays overdraft fees on each overdraft occurrence plus interest on the overdrawn balances.

Event	No overdraft protection	Monthly overdraft protection	Pay-per-use overdraft protection
Starting balance	$30	$30	$30
Phone bill ($50 pre-authorized payment)	Transaction declined	Transaction approved: -$50	Transaction approved: -$50
NSF fee	-$10	N/A	N/A
Merchant dishonoured payment fee[1]	-$30	N/A	N/A
Pay-per-use overdraft fee	N/A	N/A	-$5
Paycheque deposited	+$500	+$500	+$500
Phone bill	Transaction approved: -$50	N/A	N/A
Mid-month balance	$440	$480	$475
Vehicle payment ($495 pre-authorized payment)	Transaction declined	Transaction approved: -$495	Transaction approved: -$495
NSF fee	-$10	N/A	N/A
Merchant dishonoured payment fee	-$30	N/A	N/A
Pay-per-use overdraft fee	N/A	N/A	-$5
Paycheque deposited	+$500	+$500	+$500

Vehicle payment	Transaction approved: -$495	N/A	N/A
Monthly overdraft fee	N/A	-$5	N/A
Total fees (including merchant fees)	$80	$5	$10
Total interest on overdrawn balances[2]	N/A	$0.11	$0.15
End-of-month balance	$405	$479.89	$474.85

[1] Dishonoured-payment fees charged by merchants typically range from $20 to $40. This example uses $30 as a midpoint.

[2] Assume that each occurrence of a negative balance has a duration of 5 days. Interest payments are calculated daily and charged monthly using a 22% annual interest rate.

Currency conversion markup

Background

Banks charge consumers a markup when they have to convert money from one currency to another to complete a transaction on the consumer's behalf. This is known as the currency conversion markup,[14] and represents the difference between the "true" exchange rate—the midpoint between wholesale buy-and-sell rates in foreign exchange markets (also called the mid-market exchange rate)—and the rate applied to the consumer's transaction.

Non-bank service providers offer products that compete with some foreign currency services provided by banks. These include cross-border payments, debit or prepaid card spending in foreign currency, and multicurrency accounts. However, they typically specialize in specific segments of the market and do not offer the same suite of financial services as banks do.

Fee structure

Banks disclose the exchange rate that they apply when converting currencies, but do not disclose the markups as standalone costs. Markups can be estimated based on the exchange rates applied to specific transactions. Available data indicate that currency conversion markups typically range from approximately 1% to 4% relative to the mid-market exchange rate. The markup varies by bank, currencies being exchanged, and market conditions.

Some alternative financial services providers, including fintechs, may apply lower or no currency conversion markups.

Disclosure

Exchange rate information is typically provided to consumers at the time of the currency conversion, in the form of a single all-in rate applied to the transaction. This rate reflects both the underlying market exchange rate and the currency conversion markup.

[14] This markup is in addition to fees related to the underlying service, such as fees for bank drafts, cheques, international money transfers, wire payments, and the purchase or sale of foreign banknotes.

Key findings and implications

Key finding 12: Currency conversion markups may not be fully transparent to consumers, limiting their ability to make informed decisions

The cost of currency conversion services is embedded within an all-inclusive exchange rate applied to a consumer's transaction, with no transparency on the specific markup component.

The fact that a currency conversion markup is applied is typically described in account agreements in general terms, such as: "You acknowledge that the exchange rate used may result in revenue being earned by us on the conversion." These practices do not enable consumers to quantify the markup that is applied.

In some cases, banks present a related service that requires currency conversion (e.g., international transfers) as free, although they apply the markup to the currency conversion itself.

The inclusion of currency conversion markups in an all-in exchange rate results in low transparency. This limits consumers' ability to fully assess the cost of foreign currency conversions when choosing a service provider.

This lack of transparency has been identified as a concern in other jurisdictions. European policymakers have noted that non-transparent foreign exchange pricing can limit consumers' ability to understand the true cost of payments and may weaken price competition between foreign exchange services providers.

In response, the European Union implemented measures that require payment providers to disclose foreign exchange markups clearly, in advance, and as part of the total transaction cost, treating them as explicit currency conversion charges that must be disclosed separately (see Annex 4: Overview of the European Commission's *Directive 2014/92/EU*: Annual Statement of Fees).

In Canada, Budget 2025 announced the government's intention to explore improving the transparency of cross-border transfer fees, including foreign exchange costs.

Key finding 13: The choice of foreign exchange services provider can materially influence the total cost of currency conversions

Currency conversion markups can substantially increase the total cost of international transfers, particularly for Canadians who send money abroad regularly. For example, a consumer who sends $1,000 USD per month from an account in Canadian dollars to a family member abroad through a bank service could pay about $475 CAD above the mid-market exchange rate over the course of a year.

In contrast, using a lower-cost provider that follows, or closely tracks, the mid-market exchange rate could reduce the annual cost to about $115 CAD, for a difference of about $360 CAD per year.

Illustrative consumer scenario: Michael's story

Each month, Michael sends $1,000 USD to his mother in Florida to help with her living expenses. He uses his Canadian-dollar chequing account for this international money transfer because it's convenient and integrated with his online banking.

When Michael compares 3 providers, he discovers that sending the same $1,000 USD can cost him a different amount depending on the exchange rate and fees each provider applies.

	Big Six Bank	Fintech A[1]	Fintech B
Amount received by payee (USD)	$1,000.00	$1,000.00	$1,000.00
Exchange rate applied[2] (CAD/USD)	1.4607	1.4210	1.4635
Cost in CAD after conversion	$1,460.70	$1,421.00	$1,463.50
Transfer fee[3] (CAD)	$0.00	$9.46	$0.00
Estimated currency conversion markup (CAD)	$39.70	$0.00	$42.50
Total cost of 1 transfer	$39.70	$9.46	$42.50
Annual cost if repeated monthly (CAD)	$476.40	$113.52	$510.00

[1] This example is shown with a 0% currency conversion markup, reflecting the use of the mid-market exchange rate. In this example, the transfer is funded through a bank transfer.

[2] Exchange rates and provider fees were recorded on June 23, 2026. For simplicity, the figures presented in the table assume a constant exchange rate throughout the year.

[3] A transfer fee is a fixed charge applied for initiating or processing the payment—it is separate from, and additional to, any currency conversion markup built into the exchange rate. Consumers comparing providers should look at both the exchange rate offered and the transfer fee.

Cross-border debit fees

Background

Canadians can use their debit cards to make purchases at foreign points of sale (e.g., while travelling or online with merchants located abroad) or to withdraw cash at ATMs outside Canada. For these transactions, banks typically charge a cross-border debit fee for the purchases and withdrawals. Cross-border debit fees also apply to refunded or credited amounts, increasing the total cost of transactions that involve returns.

For cross-border debit transactions, banks do not handle the currency conversion themselves. Instead, the currency conversion is handled by the operator of the payment network used for the transaction (e.g., Visa, Mastercard, Interac).

Fee structure

Most banks charge cross-border debit fees that range from 2.5% to 3.5%, with 2.5% being the most common. The fee is calculated on the Canadian dollar amount after the foreign currency has been converted at the exchange rate set by the payment network used.

Digital banks have adopted more varied pricing approaches, with some charging 2.5% and others charging no cross-border debit fees.

Alternative financial service providers, such as fintechs, show the greatest diversity in pricing. Some do not charge cross-border debit fees at all, while others use tiered or plan-based pricing models. Under these models, lower-cost plans typically include foreign transaction fees of up to approximately 1.5%, while higher-tier or premium plans may waive these fees entirely.

Disclosure

Banks are required to disclose all applicable fees in account agreements. Information related to cross-border debit fees is disclosed as part of the broader account agreement and fee schedule. These disclosure requirements are intended to ensure that consumers are informed of potential charges and do not incur fees that were not disclosed.

Key findings and implications

Key finding 14: Disclosure requirements related to cross-border debit fees do not support price transparency, limiting consumers' ability to assess costs and choose the most appropriate form of payment

The timing and content of disclosure result in a relatively low level of transparency for cross-border debit fees.

Cross-border debit fees are not presented at the point of sale or at ATMs when the transaction is initiated. Moreover, these fees are embedded in all-in transaction costs, with no separate disclosure of the foreign exchange rate applied to the transaction. As a result, consumers may have difficulty understanding the full cost of a transaction—including the various components of the total fees and which party applies each charge.

This lack of upfront clarity can lead consumers to incur higher-than-expected costs and limits their ability to compare options and select lower-cost alternatives.

Key finding 15: The choice of provider can materially influence the total costs of cross-border debit fees

Cross-border debit fees can accumulate quickly relative to lower-cost alternatives. For example, a Canadian traveller who banks at a Big Six bank and spends $2,000 USD over a 2-week trip would incur almost $100 in cross-border debit fees at a 3.5% rate. By comparison, a lower-cost provider such as a fintech or a digital-only bank (e.g., EQ Bank) may reduce that cost to close to $0 for the same spending.

Illustrative consumer scenario: Paco's story

Paco is planning a 2-week vacation in the U.S. He expects to use his debit card for about $2,000 USD of his expenses during the trip. Before leaving, Paco compares 3 different financial products he could use while travelling: his Big Six chequing account debit card, a digital bank card, and a fintech card.

Description	Big Six bank	Digital bank	Fintech
Transaction amount (USD)	$2,000.00	$2,000.00	$2,000
Exchange rate applied[1] (CAD/USD)	1.4210	1.4210	1.4210
Transaction amount converted to CAD	$2,842.00	$2,842.00	$2,842.00
Cross-border debit fee	3.5%	0%	2.5%
Fee amount (CAD)	$99.47	$0.00	$71.05
Total cost (CAD)	$2,941.47	$2,842.00	$2,913.05

[1] The actual exchange rate applied to each transaction will vary according to the timing of the transaction and the payment network used. For simplicity, this example assumes that the same exchange rate was applied to all transactions.

Transfer-out fees

Background

Banks offer several types of registered products. These include:

- Registered Retirement Savings Plans (RRSPs)
- Registered Retirement Income Funds (RRIFs)
- Tax-Free Savings Accounts (TFSAs)
- First Home Savings Accounts (FHSAs)
- Registered Education Savings Plans (RESPs)
- Registered Disability Savings Plans (RDSPs)
- Locked-In Retirement Accounts (LIRAs)
- Life Income Funds (LIFs)

These products are established under federal legislation and are governed by rules related to eligibility, contribution limits, withdrawals, and applicable tax treatment. Registered products are typically used to hold savings and investments, including cash deposits, guaranteed investment certificates (GICs), mutual funds, and other eligible securities. Banks generally only offer accounts that hold cash deposits or GICs. Other investment accounts holding stocks, bonds, and other securities may be offered through a subsidiary of the bank.

Banks also offer investment products such as GICs and mutual funds for non-registered products (which would be subject to normal taxation rules). Banks may charge transfer-out fees when a consumer requests to move their assets from any of their registered or non-registered products to another financial service provider.

Registered and investment products are also offered by bank subsidiaries.

Transfer-out fees are charged by the relinquishing bank for each account moved, regardless of the account's balance.[15] There are 3 broad categories to define the types of investment account transfers that occur between financial service providers:

In-kind transfers involve situations where securities and assets that are fungible between financial service providers are transferred in whole to the receiving provider, without liquidation. This is only possible in cases where both financial service providers support the products being transferred.

In-cash transfers involve situations where the only asset within the account is cash, or when all of the assets are liquidated into cash and then transferred. In-cash transfers may result in additional costs or tax implications for consumers.

Combination transfers or mixed transfers involve situations where an account being transferred contains both products that can be transferred in-kind and products that need to be liquidated prior to transfer.

Receiving financial service providers may offer to reimburse transfer-out fees, either in part or in full, often during time-limited promotions or subject to conditions such as minimum asset thresholds.

The Canadian Bankers Association has established Guidelines for Transfers of Bank Registered Plans.[16] Under these guidelines, banks commit to process transfers of registered plans within a maximum of 7 business days under normal conditions, and 12 business days during peak periods (i.e., tax-return season).

Fee structure

The Government of Canada announced in Budget 2025 its intention to prohibit certain transfer-out fees to help Canadians switch between financial service providers.

Table 13. Main types and range of fees related to account transfers in Canada

Fee type	Description	Range of fees
Full account transfers	Fee to transfer all assets out of a registered product	$50–$150 per account
Partial account transfers	Fee to transfer some assets out of a registered product	$25–$75 per request

[15] Accounts may hold multiple assets, and the transfer-out fee does not depend on the number of assets that are held in each account. However, consumers may maintain multiple registered products—including products of the same type (e.g., RRSPs)—each of which may hold a single asset. In such cases, a transfer-out fee will typically apply to each account individually.

[16] The commitment does not apply to non-registered investment accounts.

Disclosure

Banks are required to disclose all applicable fees in account agreements. Transfer-out fees are disclosed in account agreements and fee schedules. These disclosure requirements are intended to ensure that consumers are informed of potential charges and do not incur fees that were not disclosed.

Key finding and implications

Key finding 16: Transfer-out fees can discourage account switching and weaken competitive pressure

Transfer-out fees can act as a barrier to switching, even when consumers identify lower-cost alternatives or products that better align with their needs. While receiving financial service providers may offer reimbursement of transfer-out fees, these offers are often conditional, time-limited, or promotional, which can add complexity and uncertainty to switching decisions.

Transfer-out fees can act as a barrier to switching providers for consumers who hold multiple accounts. Because fees are typically charged per account, the cumulative cost of transferring several accounts can be substantial and, in some cases, prohibitive.

Furthermore, transfer-out fees can disproportionately affect consumers with lower account balances. These consumers may not be eligible for reimbursement from the receiving financial service provider if their balance does not meet the minimum amount to qualify. The flat fee represents a larger share of their savings, and they may need more time to recover the cost, which could offset the potential benefits of switching, such as lower fees or better account features.

Prepaid payment products

Background

Prepaid payment products can be used to pay for purchases, with some also allowing cash withdrawals at ATMs. They can generally be used wherever cards from major payment card networks (Mastercard, Visa, and American Express) are accepted. They are available in both physical and electronic form.

There are several types of prepaid payment products (see Annex 5: Sample of prepaid payment products in Canada):

Reloadable cards: Some prepaid payment products can be loaded and reloaded with funds, with the amounts determined by the user. They can be linked to a deposit account with a financial service provider or be standalone products.

Non-reloadable cards: The initial balance on these products is fixed (e.g., $100) and no additional funds can be added. This product can no longer be used once its balance reaches zero.

Government disbursement and benefit cards: These products are designed to support government or benefit payments, including for consumers who may not have access to a bank account.

Multi-currency cards: These are reloadable products that allow consumers to hold, convert, spend, or withdraw funds in multiple currencies.

According to the *Canadian Payment Methods and Trends Report 2025:*

- 81 million prepaid payment product transactions were made in 2024, totalling $7.4 billion in value.
- Total loads on prepaid payment products grew by an estimated 9%, to $12.4 billion in 2024.
- In 2024, the average load grew by an estimated 2%, to $185.

Prepaid payment products in Canada are issued by banks and trust companies. Fintechs also offer prepaid payment products, typically in partnership with banks and third parties that support card issuance, account linkage, and related services.

Prepaid payment products are distinct from store-branded prepaid payment cards (also known as “gift cards” or “closed-loop cards”) that can only be used at specific merchants or groups of stores. These products are not issued by banks and not regulated by the federal government. As a result, they are not within the scope of the analysis below.

Regulatory framework

Canadian bank-issued prepaid payment products are regulated under the *Bank Act* and its regulations. In addition to the general requirements set out in the "Regulatory landscape: Dealings with customers and the public" chapter of this report, the framework provides that:

- Consumers' right to use loaded funds must not expire, except for promotional products.
- Banks must not charge maintenance fees for the first 12 months after activation, except in specific cases, such as promotional products or reloadable products when the consumer has expressly agreed to the charge.

Prepaid payment products issued in Canada by federally regulated trust companies are subject to the *Trust and Loan Companies Act* and must meet the requirements set out in the legislation and the Prepaid Payment Products Regulations.

The requirements imposed under the legislation and regulations are similar to those under the *Bank Act*, with a notable distinction related to external complaints-handling mechanisms. This distinction is a general feature of the legislative framework and is not specific to prepaid payment products.

Canada Deposit Insurance Corporation (CDIC) coverage may apply to prepaid payment products when the funds are held as eligible deposits at a CDIC member institution and CDIC requirements are met. Prepaid payment product disclosure information must state it if the funds are not insured by CDIC.

Several provinces and territories have rules that apply to prepaid payment products, though scope and approach vary across jurisdictions. In many cases, provincial and territorial rules are embedded within broader consumer protection frameworks.

For example, Quebec's *Consumer Protection Act* treats prepaid payment products as consumer contracts under its general consumer protection law. Provincial rules tend to focus on retailer gift cards, and some provincial frameworks exclude prepaid payment products issued by financial institutions when these products can be used on the major payment card networks.

Fee structure

Table 14. Types and range of fees related to prepaid payment products issued in Canada

Fee type	Description	Range of fees
Activation/Purchase	One-time fee charged when buying the card	$3.95–$15
Monthly/Maintenance	Regular fee to keep the card active	$0–$22/month
Reloads	Fee for adding funds to the card	$0–$6.95 per reload
Inactivity	Charged after a period of no transactions	$2.50–$5/month (after 90 days to 12 months of inactivity, or after expiry)
ATM withdrawals	Fee for withdrawing cash at ATMs (domestic or international)	$1.50–$5 per transaction
Cross-border debit fee	Percentage charged on transactions in non-CAD currencies	0%–3% of transaction amount
Replacement cards	Cost to replace a lost, stolen, or expired card	$0–$15
Balance inquiries	Fee for checking balance via ATM or customer service	$0.50–$2 per inquiry
Card customization	Optional fee for personalized card design	$0–$6.99
Balance transfer/Closure	Fee for transferring remaining balance or closing the account	$0–$10

Disclosure

Issuers of prepaid payment products are required to disclose key information to consumers, including applicable fees. These requirements are intended to support consumers' informed decision-making related to purchasing and using prepaid payment products.

Key findings and implications

Key finding 17: Fees can significantly reduce prepaid payment products' balances over time

Some prepaid payment products (e.g., fintechs' prepaid payment products) offer a low-fee structure, with no monthly or annual fees. These are typically linked to an account and generally do not charge inactivity fees, helping preserve balance over time.

In contrast, other prepaid payment products (e.g., mainly distributed in retail stores) carry higher upfront fees and may charge inactivity fees after a period of non-use (e.g., 12 months). These products are not typically linked to an account. As a result, a $25 prepaid payment product could lose its full value in under 2 years if left unused.

Overall, balance depletion is more likely for prepaid payment products with higher upfront and ongoing fees, particularly when the products are not used soon after purchase. Timely use matters, as inactivity and maintenance fees can deplete balances, even in the absence of transactions.

Illustrative consumer scenario: Charles' story

Charles gets 2 prepaid payment products and loads them with $100 each:

- a prepaid card issued by a Big Six bank (with an annual fee of $9.99 and $5 transaction fees)
- a prepaid card issued by a digital bank (with no annual fee and no inactivity fee)

In 2 weeks, Charles makes a $45 purchase with both cards. He uses both cards again 4 months later to make a $25 bill payment.

While the transaction patterns are the same, the remaining balance on each card differs after 13 months due to differences in fee structures.

	Big Six prepaid card		Digital bank prepaid card	
	Fees	Balance on card	Fees	Balance on card
Initial value (CAD)	-	$100	-	$100
Week 1 (annual fee)	$9.99	$90.01	$0	$100
Week 2 ($45 purchase)	$0	$45.01	$0	$55
Month 4 ($25 bill payment)	$5	$15.01	$0	$30
After 13 months (annual fee)	$9.99	$5.02	$0	$30

Key finding 18: How a prepaid payment product is used can significantly affect the total fees paid

The way consumers use prepaid payment products can significantly affect how much they will pay in fees. For example, ATM withdrawal fees and cross-border debit fees vary widely across different products on the market, and not using a prepaid payment card in a timely manner can trigger inactivity fees that consumers may not anticipate.

Illustrative consumer scenario: Mary and Emma's story

Mary buys 2 prepaid payment cards loaded with $100 CAD each for her daughter Emma, who is travelling on a school trip to the United States:

- a prepaid card issued by a bank (with a $9.99 annual fee and $5 transaction fees)
- a prepaid card issued by a fintech (with no annual fees and no flat withdrawal fees)

Emma needs cash several times during her trip, both in Canada and in the U.S. She uses each card to make 3 withdrawals of $20 each, from 3 different ATMs, for a total of 6 withdrawals.

Although Emma's usage is identical for both cards, the total cost differs significantly due to differences in fee structures.

	Bank prepaid card		Fintech prepaid card	
	Fees	Balance on card	Fees	Balance on card
Initial value (CAD)		$100		$100
Annual fee	$9.99	$90.01	$0	$100
$20 CAD ATM withdrawal	$5	$65.01	$0	$80
$20 CAD ATM withdrawal	$5	$40.01	$0	$60
$20 USD ATM withdrawal	$5.69	$6.86[1]	$0	$32.54[2]

[1] Currency conversion using USD to CAD Mastercard daily rate (1.3729) = $27.46 CAD + 2.5% foreign exchange fee ($0.69 CAD) + $5 flat fee = $33.15 CAD.
[2] Currency conversion using USD to CAD Mastercard daily rate (1.3729) = $27.46 CAD.

Key finding 19: Prepaid payment product fees may not be transparent, which may limit consumers' ability to make informed decisions

For physical prepaid cards, fee information may appear in small print on the packaging, with the full terms and conditions inside. This presentation can make it difficult for consumers to identify and understand the potential fees before purchasing the card. Consumers may face similar challenges with digital prepaid payment products when certain terms and conditions do not appear prominently at the point of sale.

As a result, consumers may find it more difficult to compare options and select products that best meet their needs, such as a product with lower currency conversion fees for travel.

In addition, ambiguous marketing can blur the distinction between prepaid payment products and retailer gift cards. This may lead consumers to assume that prepaid payment products operate like gift cards—carrying no fees or restrictions—when in fact, they are subject to different terms, conditions and fee structures.

Transparency

Background

Transparency is a necessary feature of well-functioning markets. In the context of banking services, transparency refers to the clear and timely communication of information that is accessible in a manner that enables informed decision-making. Transparency serves several purposes:

- **Reducing information gaps**: Clear and timely information helps consumers understand the costs, features, and conditions associated with financial products and services.
- **Supporting consumer choice**: When fees and terms and conditions are easy to find and understand, consumers are better positioned to select products and services and use them in a manner that best aligns with their needs.
- **Enabling competition**: Access to comparable information allows consumers to assess alternatives across financial service providers, strengthening competitive pressures on pricing, product and service design, and service quality.

Jurisdictions around the world, including Canada, have established regulatory frameworks to support transparency through disclosure requirements. Global standard-setting bodies such as the G20/OECD and the World Bank have articulated principles and good practices that emphasize clear, comparable, and timely disclosure as a foundation for informed consumer decision-making (see Annex 2: UK regulatory history and Annex 6: G20/OECD High-Level Principles on Financial Consumer Protection and World Bank's Good Practices for Financial Consumer Protection).

These requirements set expectations for the content, manner and timing of information provided to consumers.

Regulatory framework

In Canada, legislative requirements set expectations for the content, manner, and timing of disclosure information provided to bank consumers.

The *Bank Act* and its regulations set out disclosure requirements around plain language communication, standardized precontract disclosures, and ongoing disclosure throughout the life of a financial product or service. These include both general requirements for banks in their communications with their customers and the public, and requirements that apply to specific products and services.

Key requirements relate to the content, manner, and timing of disclosures, and include the following:

Content of disclosure

The *Bank Act* includes general requirements regarding what should be disclosed, including:

- the features of the product or service
- a list of all charges and penalties applicable to a product or service
- a person's rights and obligations with respect to a product or service

Manner of disclosure

When disclosure is required, the legislation sets out how it should be disclosed. It includes requirements on:

- using language that is clear, simple, and not misleading
- providing information in writing, in a format that allows consumers to retain it
- displaying the information prominently in branches and on banks' websites

Timing of disclosure

The legislation also sets out requirements to support consumers in making informed decisions throughout the lifecycle of a product or service, including requiring banks to:

- send electronic alerts when a consumer's personal deposit balance falls below $100 (by default) or below a threshold set by the consumer
- notify consumers of any increase or new charges applicable to a personal deposit account at least 30 days before the effective date of the change

Effectiveness

Banks hold information, expertise, and control of product design and pricing over individual consumers. This reflects an inherent information imbalance that disclosure requirements alone cannot fully mitigate.

Research indicates that while disclosure requirements are an important component of transparency, consumers face multiple challenges to fully understand, compare and anticipate the costs of financial products (see Annex 7: Effectiveness of disclosure and limitations). This is particularly relevant because bank fees are complex, cumulative and contingent on usage.

The selection of a deposit account illustrates some of these challenges.

Selecting an appropriate account requires consumers to consider not only fees that are most prominently advertised or disclosed upfront, but also multiple other pricing elements, such as interest rates, transaction limits, overdraft charges, e-transfer fees, ATM access and digital banking features, and eligibility for fee waivers or discounts.

Comparisons may also involve additional variables, including bundled product features, time-limited promotions, conditional fee waivers, and non-price attributes such as branch access or digital banking features.

The number and timing of transactions directly affect the total cost of the use of the account. These costs vary based on individual usage patterns and the mix of services used.

As a result, disclosure information about fees may not, on its own, provide a clear basis for assessing which account aligns most closely with a consumer's expected usage, particularly when future usage patterns and financial circumstances evolve over time.

Recent initiatives to improve transparency

Recent policy initiatives in other jurisdictions and sectors have sought to address limitations in traditional disclosure frameworks, particularly when transaction-level information has a material impact on the total cost of financial products and services over time.

In the European Union, the European Commission observed that consumers often received fee information at the transaction or point-of-sale level, which did not provide a clear picture of the total cost incurred over time, or support comparisons based on actual usage. As a result, consumers faced challenges in assessing value for money.

In response, the European Commission introduced a standardized annual statement of fees (see Annex 4: Overview of the European Commission's *Directive 2014/92/EU*: Annual Statement of Fees), requiring banks and other payment service providers to provide consumers, free of charge, with an annual summary of all fees paid, including totals by service category. This measure provides consumers with a consolidated view of costs over the life of a product.

Similar challenges with existing disclosure requirements have been identified in Canada's investment sector (see Annex 8: Recent disclosure reforms to the investment market in Canada). The Canadian Securities Administrators (CSA) found that existing disclosures did not always provide investors with a clear understanding of the fees and compensation associated with their investments.

The CSA addressed these issues through phased reforms:

- Phase 1 introduced requirements to report fees and compensation annually in dollar amounts, to provide clearer disclosure about their relationship with investors.
- Phase 2 expands disclosure to include ongoing fund expenses borne indirectly by investors, with firms required to report these costs in dollar terms alongside standardized cost metrics.

These measures represent an initial shift from point-in-time disclosure to a more complete, usage-based view of the cost of financial services.

Key findings and implications

Key finding 20: Point-in-time information does not always support price transparency

Banks are required to disclose all applicable fees in account agreements. For deposit accounts, they must also provide periodic statements and notify customers of changes to key terms, fees, or conditions. This approach does not provide a clear picture of the total cost incurred over time, based on individual usage patterns. This can limit consumers' ability to compare products or assess how costs evolve over time.

Key finding 21: Usage-based, personalized disclosure could improve transparency

Some banks provide customers with access to tools and information to help them monitor their accounts, track transactions and fees, and manage their finances. Building on these practices, disclosure approaches that reflect actual usage could provide a more complete and personalized view of the fees consumers incur. Usage-based information could also support comparisons across products and help consumers assess how well their account features align with their needs.

Transparency could be further enhanced with a statement from banks that would support an assessment of product fit, including through like-for-like comparisons and, where available, information on alternative account options offered by the same bank.

Existing disclosure requirements (e.g., low-balance alerts) could be adapted to provide timely notifications when consumers are nearing their transaction limits or incurring excess transaction fees. Repeated reminders would increase the salience of these costs and may prompt consumers to reassess their account usage or consider alternative options that better align with their needs.

Key finding 22: Consumer-driven banking has the potential to improve transparency, which can support informed decision-making and facilitate switching by making it easier to compare alternatives

From a transparency perspective, the implementation of consumer-driven banking in Canada has the potential to support a better understanding of how banking costs accrue over time (see the "Consumer-driven banking box" in the "Market dynamics" chapter of this report).

By enabling consumers to consent to sharing their financial data, new service providers could emerge to offer comparison tools and provide consumers with tailored insights—for example, the total fees paid over a given period, including account maintenance fees, overdraft charges, and transaction

costs. This information would complement existing point-in-time disclosure requirements by enabling more tailored and usage-based information to be generated and shared.

Enhanced access to data could also support comparisons across financial service providers. By using information that reflects their actual usage patterns, consumers would be better able to compare products and providers, which could help reduce switching frictions.

Conclusion

Taken together, the Review's 22 findings highlight several themes that may warrant further policy consideration (see Table 16). Across the fee categories examined, the findings suggest that the cost of banking is shaped not only by the level of individual fees, but also by how fees interact, accumulate and are experienced by consumers over time. While a range of banking products and alternatives is available, consumers may not always have the information needed to understand the full cost of banking, compare options effectively, or determine whether their current products continue to meet their needs.

The Review identifies opportunities to strengthen transparency, improve comparability and reduce barriers that can make it difficult for consumers to act on better information. Its findings suggest that enhanced disclosure approaches, including more personalized and usage-based information, could help consumers better understand the fees they pay and support more informed decision-making. The findings also point to the potential benefits of measures that facilitate switching and strengthen competitive dynamics, including the implementation of consumer-driven banking.

As Canada's financial marketplace continues to evolve, ongoing research and evidence-based policy development will remain important to understanding how banking fees affect consumers and how financial consumer protection frameworks can continue to support good outcomes. The Review's findings provide a foundation for future policy discussions on transparency, comparability, switching and competition, and highlight the importance of continuing to assess whether consumers have the information and tools they need to make informed financial decisions.

Consistent with its mandate, FCAC will continue to monitor trends and emerging issues, contribute research and analysis to support evidence-based policy development, and assess how banking fees affect Canadian consumers. The Review's findings will also inform FCAC's consumer awareness and financial literacy initiatives, including the renewal of the National Financial Literacy Strategy, helping Canadians make informed financial decisions in an increasingly complex financial marketplace.

Table 15. Key findings and implications of the Review

Areas of focus	Key findings and implications
Account maintenance fees	1. Misalignment between account features and usage can increase costs 2. Fee waivers with a minimum daily balance can reduce banking costs, but may also involve hidden trade-offs
Excess transaction fees	3. It may be difficult for consumers to avoid paying excess transaction fees without a way to monitor transaction usage 4. Legacy account plans may result in higher costs for common banking activities 5. Consumers using savings accounts for transactions often incur avoidable fees

Areas of focus	Key findings and implications
	6. Consumers continue to incur excess transaction fees
ATM fees	7. Consumers may not know the total cost of an ATM withdrawal before completing the transaction 8. Stacking of ATM fees can increase the cost of withdrawing cash
NSF fees	9. Usage-based, personalized disclosure would improve transparency of NSF fees
Overdraft protection fees	10. Usage-based, personalized disclosure would improve transparency of overdraft protection fees 11. Overdraft protection can be a lower-cost alternative for consumers who experience dishonoured payments
Currency conversion markup	12. Currency conversion markups may not be fully transparent to consumers, limiting their ability to make informed decisions. 13. The choice of foreign exchange services provider can materially influence the total cost of currency conversions
Cross-border debit fees	14. Disclosure requirements related to cross-border debit fees do not support price transparency, limiting consumers' ability to assess costs and choose the most appropriate form of payment 15. The choice of provider can materially influence the total costs of cross-border debit fees
Transfer-out fees	16. Transfer-out fees can discourage account switching and weaken competitive pressure
Prepaid payment products	17. Fees can significantly reduce prepaid payment products' balances over time 18. How a prepaid payment product is used can significantly affect the total fees paid 19. Prepaid payment product fees may not be transparent, which may limit consumers' ability to make informed decisions
Transparency	20. Banks are required to disclose all applicable fees in account agreements, and, for deposit accounts, they must also provide periodic statements and notify customers of changes to key terms, fees, or conditions 21. Some banks provide customers with access to tools and information to help them monitor their accounts, track transactions and fees, and manage their finances. Building on these practices, disclosure approaches that reflect actual usage could provide a more complete and personalized view of the fees consumers incur. Usage-based

Areas of focus	Key findings and implications
	information could also support comparisons across products and help consumers assess how well their account features align with their needs. 22. Consumer-driven banking has the potential to improve transparency, which can support informed decision-making and facilitate switching by making it easier to compare alternatives

Annexes

Annex 1: Switching costs and competition in banking

Economic theory: Why switching costs matter

Consumers face multiple costs when changing providers, including direct costs such as transfer-out fees, and indirect costs such as time, hassle, paperwork, and uncertainty. When these costs are material, financial institutions can acquire and then retain customers, which allows institutions to sustain margins from existing customers even when rivals offer better prices or quality. This mechanism is well established in the industrial organization literature on competition and switching costs.

Evidence from retail banking and consumer behaviour

Evidence from retail banking markets is broadly consistent with economic theory: switching rates tend to be low, consumer engagement is often weak, and market shares adjust slowly to differences in prices and service quality.

For example, the UK's Competition and Markets Authority (CMA) conducted a retail banking market investigation that concluded that weak consumer engagement—driven by factors such as perceived hassle, difficulty comparing products, and limited attention—reduced the effectiveness of competition in personal current accounts and related services.

In that investigation, the CMA observed that:

- Many customers remained with the same bank for long periods
- Switching rates were low
- Banks with better prices or quality tended to gain market share only slowly

These patterns are consistent with consumers being insufficiently responsive to better offers. The CMA linked low engagement to multiple frictions, including the absence of a natural "trigger point" to review accounts, the effort required to gather and combine information, and perceptions that switching providers is burdensome.

Experimental evidence also suggests that information alone may be insufficient to overcome inertia when switching involves effort and hassle. In field experiments with UK savings-account holders, well-designed disclosures increased switching only modestly on average; interventions that reduced frictions—such as more prominent prompts—simplified steps, and timely reminders had larger effects, consistent with switching costs and attention costs being central constraints.

Similarly, behavioural research finds that consumers may procrastinate or avoid complex administrative tasks, place too much importance on immediate hassles relative to future gains, and exhibit *status quo* bias. These factors can make switching costs more difficult to overcome and may discourage consumers from switching, even when they are dissatisfied or could save money by doing so.

Annex 2: UK regulatory history

Background

This section outlines the key regulatory reviews, market studies and policy initiatives undertaken in the UK over the past 25 years to improve competition and consumer outcomes in the retail banking market.

The UK's recent experience over the past 2 decades shows how high market concentration, low switching rates, and limited transparency can weaken competitive dynamics in retail banking. In response, policymakers and regulators in the UK introduced reforms to improve transparency, facilitate account switching, and promote greater competition. These reforms provide a useful point of comparison for understanding how market structure, switching frictions, and product transparency affect consumer choice, prices, and service quality. This annex is descriptive and does not evaluate the effectiveness of these measures or their applicability to the Canadian context.

Findings of key commissions and investigations, 1998 to 2013

UK Chancellor Gordon Brown commissioned an independent review of UK banking services in 1998. The resulting report, known as the *Cruickshank Report*,[17] was published in 2000. On retail banking services, the *Cruickshank Report* found that:

- The supply of banking services to retail customers was highly profitable
- The chequing account market played a critical role in competition for other retail banking products and services
- The chequing account market was highly concentrated within the largest 4 UK retail banks
- Consumers perceived significant barriers to switching banking products, largely owing to the perceived time and inconvenience involved in switching account providers
- For markets to work effectively in the interests of consumers, it is vital that the costs and difficulties of switching chequing accounts are kept to a minimum
- Consumers faced substantial information asymmetries that limited their ability to understand the terms of their banking products and to make informed comparisons between providers
- Banks had no incentive to encourage switching, as consumers that are locked into a provider tolerate higher prices than those who actively shop around and switch between providers

[17] Cruickshank, D. (2000). *Competition in UK banking: A report to the Chancellor of the Exchequer*.

The UK Office of Fair Trading (OFT), a UK government department that was tasked with enforcing consumer protection and competition law, completed a market study on chequing accounts[18] (known as personal current accounts or PCAs) in 2008. Key findings included:

- Banks viewed PCAs as a gateway through which they could sell other products as consumers often select financial products from their existing banks without shopping around
- The UK's predominant "free-if-in-credit" (FIIC) account model—under which consumers generally pay no monthly account fees or charges for basic services—can nevertheless impose costs on consumers through foregone interest, as balances held in current accounts often earn little or no interest compared with alternative savings products
- Barriers to entry limited the ability of smaller banks to become effective competitors to their rivals
- The study highlighted low levels of consumer switching as a key barrier

The OFT study concluded with concerns that features of the market were not working well for consumers, including:

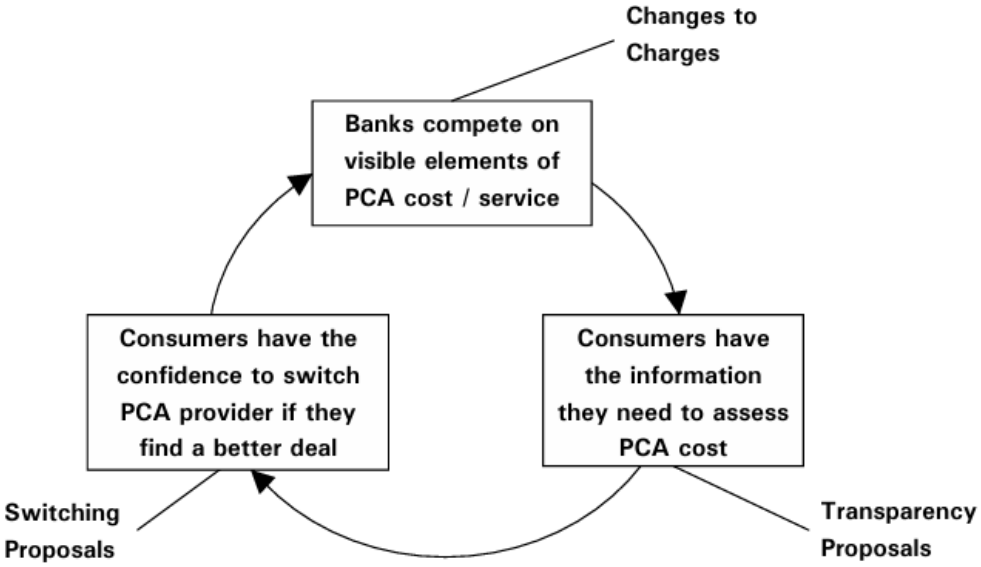
- limited transparency on fees, meaning consumers lack fundamental information needed to compare competing products
- complexity in the way fees are implemented
- a perception across a significant proportion of consumers that switching is both risky and complex

A follow-up paper in 2009 described the "pro-competitive virtuous cycle" replicated in Figure 1. It describes a process where, as consumers become more aware of the costs of their chequing account and more confident in switching to get better service, banks would need to offer more competitive products and innovative services to attract and retain customers.

The OFT explained that, through this process, more efficient firms will gain market share, which is good for consumer welfare and, by reducing costs, is good for broader economic productivity.

[18] OFT. (2008). *Personal Current Accounts in the UK: An OFT market study*.

Figure 1: OFT's diagram of the pro-competitive virtuous cycle in banking



Source: OFT. (2009). *Personal current accounts in the UK: A follow-up report*.

In 2010, in the wake of the 2008–2009 financial crisis, the UK government set up the Independent Commission on Banking (also called the Vickers Commission). It was established to consider structural and non-structural reforms to the UK banking sector to promote financial stability and competition.[19]

The Vickers Commission found most of the competition problems highlighted by the *Cruickshank Report* remained. It highlighted both supply and demand-side problems.

On the supply side, the PCA market had become more concentrated in the wake of the financial crisis, as several challenger banks had left the market, often through acquisitions.

On the demand side, the report highlighted high switching costs and opaque product comparisons with "remarkably low" PCA switching rates that were not accompanied by high levels of customer satisfaction with existing suppliers.

The Vickers Commission concluded that competition in UK retail banking was not working well, and made the following recommendations on competition:

- **Market structure**: Ensure that the expected independent entity resulting from the divestment of part of Lloyds Banking group's retail banking operations (as required by the European Commission) would be an effective competitor in the PCA market
- **Barriers to entry and expansion**: Recommended the UK prudential regulators "review the application of prudential standards to ensure that prudential requirements for capital and

[19] Independent Commission on Banking. (2011). *Final Report Recommendations*.

liquidity do not unnecessarily limit the ability of new entrants to enter the market safely and to grow"

- **Switching**: Recommended that a chequing account redirection service should be established to smooth the process of switching chequing accounts for individuals and small businesses that would:
    - catch all credits and debits going to the closed account, including automated payments taken from debit cards as well as direct debits
    - be seamless for the consumer so that throughout the process they have complete, problem-free use of their banking services and are not inconvenienced by debits or credits going to the wrong account
    - last for at least 13 months, to catch annual payments
    - continue to send reminders and provide support to direct debit originators to ensure that they update their details for people who have switched accounts
    - guarantee that consumer will not suffer a loss if mistakes occur in the switching process
    - be free to the consumer
- **Transparency**: Recommended that the OFT and the Financial Conduct Authority (FCA) work with banks to improve transparency across all retail banking products, especially for chequing accounts.
    - Banks should provide data of the cost of their services for a sample of representative customer profiles to demonstrate potential costs and should provide price information in an accessible form in response to any reasonable request from a price comparison site
    - Banks should incorporate the interest customers could have earned on chequing account balances (relative to the central bank base rate) into annual customer statements
    - The FCA should consider other options for improving transparency for customers, including improving price comparison tools for chequing accounts, and developing comparison tools for non-price product characteristics

The FCA, established in 2013, is the UK's current financial services regulator. It has 3 operational objectives set out in legislation:

- secure an appropriate degree of protection for consumers
- enhance the integrity of the UK financial system

- promote effective competition in the interests of consumers [20]

Barriers to entry and expansion

The *Cruickshank Report* and the Vickers Commission identified high barriers to entry and expansion as key obstacles to effective competition from new entrants to the banking system—especially for chequing accounts—that helped to sustain high market concentration among large incumbent banks.

The Vickers Commission recommended that the prudential regulators consider whether capital and liquidity requirements were unduly limiting the ability for new firms to enter the market.

Regulatory sandbox to encourage innovation

The FCA introduced the "Regulatory Sandbox" in 2015, to promote competition by supporting disruptive innovation. [21] The Regulatory Sandbox is a facility for firms to test innovative products and services. The Sandbox firms are subject to less strict prudential requirements and more flexible regulatory standards than would be required with a full market roll-out of the innovative products.

The Regulatory Sandbox aims to reduce time-to-market at potentially lower cost and improve firms' access to financing by helping to reduce regulatory uncertainty, enabling more innovative products to reach the market. It also enables the FCA to work with firms to ensure appropriate consumer safeguards are built into their new products and services before reaching the mass market.

The Regulatory Sandbox borrows concepts from clinical trials, and the FCA works closely with Sandbox firms to develop a testing procedure. Sandbox firm customers have the same rights as customers who engage with other authorised firms. The Sandbox firms can only test their new products on customers who have given informed consent to be included in testing and are required to compensate any losses to customers resulting from the innovative product.

The FCA considers the Regulatory Sandbox has led to better outcomes for consumers through an increased range of products and services, reduced costs, and improved access to financial services. Research on the impact of regulatory sandboxes finds positive effects on fintech companies' access to capital and long-term survival rates. [22]

Open banking reforms

Following a Competition and Markets Authority (CMA) investigation in 2016, the UK has adopted open banking requirements in financial services markets. In 2017, the 9 largest UK banks were required to adopt secure, standardised software protocols (application programming interfaces or APIs) to allow third-party firms to access their customers' financial information.

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[20] FCA. (2014). *Annual report and accounts 2013–2014*.
[21] FCA. (2015). *Regulatory Sandbox*.
[22] Bank of International Settlements. (2023). *Regulatory Sandboxes and fintech funding: evidence from the UK* (BIS Working Paper No. 901).

The enabling of read-and-write capabilities for customer-authorised third-party firms increased the scope of innovative products and new entrants to provide financial services to consumers.

According to the CMA, open banking is "widely recognised as a major success, with many other countries considering similar open standards," which has helped to improve financial decision-making for consumers and drive down costs for small and medium sized businesses, boosting competition and innovation. [23]

Between 2013 and 2021, the combined market share of the UK's "Big 4" banks declined from 77% in 2013, to 68% in 2018, [24] to 64% in 2021. [25]

Between 2018 and 2021, digital challenger banks significantly increased their combined market share from 1% to 8%; taking market share from the Big 4 banks as well as from larger, traditional challenger banks. [26] As a result, the UK's Big 4 banks continue to retain a high market share but face significant effective competition from challenger banks.

Switching

The *Cruickshank Report* and the Vickers Commission identified low switching rates and high switching costs for chequing accounts as a significant impediment for effective competition. The reasons identified for low switching rates included:

- significant consumer effort required to update account details with direct debit originators, their employer, and anyone else that makes payments into their existing account
- consumer risks from financial penalties and disruption from failed payments due to the incomplete or inaccurate updating of account information for all relevant payment senders and receivers
- a perceived lack of compelling alternatives to their existing account services
- difficulties in consumers' ability to compare chequing account costs and benefits

A 2006 Bank of England research paper found evidence indicating high switching costs in the UK personal chequing account market in which there was a positive relationship between levels of market share and price.

This suggests that with high switching costs, each bank faces a trade-off between increasing profits by raising prices for its existing customers but losing some of its customer base and attracting fewer new

[23] CMA. (2023). *Millions of customers benefit as Open Banking reaches milestone* [Press release].
[24] Approximately 4% of the change to this date was due to the European Commission requirement for Lloyds Banking Group to divest a significant proportion of its retail operations.
[25] FCA. (2022). *Strategic Review of Retail Banking Business Models: Final Report 2022*.
[26] FCA. (2022). *Strategic review of retail banking business models: Annexes to the final report*.

customers. Each bank's market share dictates how this trade-off is resolved: larger market shares incentivise higher prices (profits) when high switching costs exist.

Current Account Switching Service (CASS)

In 2013, the UK launched the Current Account Switching Service (CASS), which was intended to significantly reduce customer switching costs through a faster and more reliable account switching service. Under the CASS, it is the banks' responsibility to ensure that account deposits are transferred, and direct debit details are fully updated for all payers and payees associated with the original account.

The CASS requires banks to automatically redirect payments sent to the original account for 36 months after the switch, with notifications of the new account details sent to the payer. The CASS requires banks to perform account switching within a 7-day window, and consumers are provided with a switch guarantee that fully protects them against any financial losses incurred in the event that a problem occurs during the switch.

Transparency

Effective competition requires that consumers can make informed decisions in a timely manner. The *Cruickshank Report* and the Vickers Commission identified poor customer information and product transparency as significant impediments for effective competition. Customers struggled to understand the costs of their financial products, and to compare between alternative financial products.

In 2012, the UK government encouraged the major banks to voluntarily agree to provide text alert services to warn customers when their chequing account balances are low. In 2015, the FCA found that there is a significant consumer benefit from the combination of receiving information from an automatic trigger and the facility to act quickly upon receiving it. It further found that text alerts and mobile banking apps also decrease average chequing account balances by 17% to 24%, which reduces the forgone-interest cost to the consumer of holding significant balances in zero (or low) interest chequing accounts.[27]

In 2023, the FCA introduced the Consumer Duty[28] (the Duty), which sets the standard of care that firms must provide to customers in retail financial markets. The Duty requires firms to proactively act to deliver good outcomes for retail customers. It includes a series of expected market outcomes that firms must deliver:

- The **products and services** outcome requirements aim to ensure that products are designed to meet the identified target customer's needs and objectives
- The **price and value** outcome aims to ensure the price the customer pays for a product or service is reasonable compared to the overall benefits of the product to the customer

[27] FCA. (2015). *Message received? The impact of annual summaries, text alerts and mobile apps on consumer banking behaviour*.
[28] FCA. (2022). *FG22/5 Final non-Handbook Guidance for firms on the Consumer Duty*.

- The **consumer understanding** outcome requires firms to communicate information about the product or service that is clear, fair and not misleading to meet the needs of the intended target customer

- The **consumer support** outcome requires firms to provide intended target customers with sufficient support to realise the benefits of the products and services they buy, pursue their financial objectives and ensure that they can act in their own interests [29]

The FCA has found that the Duty has led to firms delivering better outcomes for consumers in retail financial markets, as well as identifying areas where ongoing improvements are required. [30] For example, the FCA notes that it has seen firms updating pricing models, reducing or removing charges for certain products, putting in controls for certain customer groups, and capping fees or removing fees entirely where firms could not justify the product's cost. The FCA does acknowledge that some firms must continue to improve to meet the standards set by the Duty.

[29] FCA. (2022).*FG22/5 Final non-Handbook Guidance for firms on the Consumer Duty*.
[30] FCA. (2024). *Consumer Duty implementation: Good practice and areas for improvement*.

Annex 3: Demand for cash and Canada's ATM network

Cash continues to play a role in Canada, even as digital payment methods expand. According to the Bank of Canada, cash usage at the point-of-sale has remained relatively stable since 2020, accounting for approximately 20% of transactions by volume, and 10–12% by value between 2020 and 2024.

ATMs remain the primary channel for accessing cash, exceeding both bank branch withdrawals and cashbacks (i.e., cash withdrawals at the point-of-sale using a debit card). In 2024, approximately 32% of respondents to the Bank of Canada's *Methods-of-Payment Survey* reported making ATM withdrawals, compared to 8% who withdrew cash at a branch and 6.3% who obtained a cashback at retail locations.

Canadians conducted approximately 385 million ATM transactions in 2023, representing a 16% decline from about 456 million transactions in 2019. Despite this decline in volume, the total value of ATM withdrawals increased by about 22%, from $67 billion in 2019 to $82 billion in 2023. This suggests that Canadians are making fewer but larger ATM withdrawals.

Branch closures and the ATM network

Canada's ATM network consists of both ATMs that are owned by a financial institution and privately owned-and-operated (white-label) ATMs.

Between 2019 and 2022, the total number of ATMs increased modestly from 60,568 in 2019 to 62,805 in 2022 (+3.7%). This growth was observed across both segments:

- bank-owned ATMs increased from 20,249 to 20,938 (+3.4%)
- white-label ATMs increased from 40,319 to 41,867 (+3.8%)

Over the same period, the number of bank and credit union branches declined from 8,895 in 2019 to 8,436 in 2022 (-5.2%), with a more pronounced decline in rural areas (-7.2%).

The expansion of the ATM network has helped maintain access to cash despite the decline in physical branches, but this growth has not kept pace with—or offset—the reduction in branch access. Moreover, more than half of this growth has been driven by white-label ATMs that carry higher fees for consumers.

Annex 4: Overview of the European Commission's Directive 2014/92/EU: Annual Statement of Fees

Directive 2014/92/EU,[31] adopted by the European Parliament and Council, establishes EU-wide rules to improve transparency and comparability of payment account fees.[32]

Prior to *Directive 2014/92/EU*, consumers typically received fragmented, incomplete, or transaction-level fee information (e.g., monthly statements) that did not provide a clear overview of the total cost of holding and using a payment account over time.

The European Commission found that consumers lacked a consolidated view of the fees they actually paid, making it difficult to evaluate value for money or compare accounts based on real usage patterns. It concluded that *ex ante* disclosure (information that must be provided before a consumer enters into a contract) alone was insufficient to overcome information asymmetry and consumer inertia in retail banking markets.

Among other measures, the Directive requires payment service providers (including banks) to provide consumers, at least annually and free of charge, with an Annual Statement of Fees that summarizes:

- all fees charged for services linked to the payment account during the reporting period
- the total amount paid for each category of service

The Annual Statement of Fees is intended to provide consumers with a clear, standardised overview of all fees actually incurred over a defined period, enabling informed reassessment of a consumers' payment account, and supporting effective switching decisions. This annual statement complements pre-contractual disclosures, by ensuring transparency through the life of a financial product or service, not only at the point of sale.

Expected effects

The Commission's Impact Assessment[33] identified the Annual Statement of Fees as a critical disclosure tool intended to support consumer awareness and decision-making, rather than solely to provide information. Its expected effects included:

- improved consumer awareness of cumulative costs, reducing underestimation of banking fees
- stronger incentives to switch accounts, based on real usage rather than hypothetical pricing

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[31] European Parliament and Council of the European Union. (2014). *Directive 2014/92/EU of the European Parliament and of the Council of 23 July 2014 on the comparability of fees related to payment accounts, payment account switching and access to payment accounts with basic features*.

[32] Note that bank accounts qualify as payment accounts.

[33] European Commission. (2013). Commission staff working document: Impact assessment accompanying the document proposal for a directive of the European Parliament and of the Council on the comparability of fees related to payment accounts, payment account switching and access to payment accounts with basic features.

- increased competitive pressure on providers with high or complex fee structures
- reinforcement of internal market objectives, by making fee structures comparable across providers and Member States

Policy significance

By mandating a uniform, consumer-friendly annual summary of fees, *Directive 2014/92/EU* sought to strengthen transparency, support informed switching, and reinforce competition in the EU retail banking market.

The European Commission's 2025 review found broad compliance with the Statement of Fees requirements across Member States and reported that most national authorities considered the measure to have reduced consumer harm. However, the Commission concluded that more robust evidence would be needed to assess the extent to which the Statement of Fees has improved consumer decision-making, transparency, or competitive outcomes.

Statement of Fees template



Statement of Fees



[Name of the account provider]
[Contact details of the account provider]
[Client name]
[Contact details]

Account	
Account identification	
Period	From: To:
Date	

This document provides you with an overview of all the fees for services linked to your payment account during the period shown above.

It also informs you about any interest you may have paid or earned during this time.

Information on individual transactions and account balance can be found on your account statements.

Summary of fees and interest

Total fees paid (total package of services fees and total fees paid)	[●]
Total interest paid	[●]
Total interest earned	[●]
Comprehensive cost indicator	[●]

Detailed statement of fees paid on the account

Service		Fee		
Service	**Number of times the service was used**	**Unit fee**	**Number of times the fee was charged**	**Total**
General account services				
[●] Includes a **package of services** consisting of: Services beyond these quantities have been charged separately.				[●]
Payments (excluding cards)				
				[●]
Cards and cash				
				[●]
Overdraft and related services				
				[●]
Other services				
				[●]
Total fees paid				[●]

Detail of the fees included in the package of services

Package of services	Fee	Number of times the fee was charged
'Package service' [brand name, if applicable] Includes:	[●]	[●]
Services beyond these quantities have been charged separately		

Detail of interest paid on the account

	Interest rate	Interest
		[●]
Total interest paid		[●]

Detail of interest earned on the account

	Interest rate	Interest
'Account name'		[●]
Total interest earned		[●]
Additional information [●]		

Annex 5: Sample of prepaid payment products in Canada

Table 16. Sample of prepaid payment products in Canada

Product[1]	Purchase/Monthly/Annual fees	ATM access	Foreign exchange fees	Other fees
KOHO Prepaid Mastercard (Essential Plan)	$4 (or $0 by adding $1,000 monthly or setting up a direct deposit)	Free (except third parties)	MC conversion rate + 1.5%	Loading money from a debit card: $3 per load
KOHO Prepaid Mastercard (Extra Plan)	$18 monthly, or $144 annually	Free (except third parties) Withdrawal limits may be in place 1 free international ATM transaction per month	MC conversion rate	Loading money from a debit card: $3 per load
KOHO Prepaid Mastercard (Everything Plan)	$22 monthly, or $177 annually	Free (except third parties) Withdrawal limits may be in place 1 free international ATM transaction per month	MC conversion rate	None
Wise Multi-Currency Card	$0	For withdrawals of up to $350 per month: First 2 withdrawals: Free 3 or more withdrawals: $1.5 per withdrawal For withdrawals of over $350 per month: First 2 withdrawals: 1.75% of the amount over $350 3 or more withdrawals: $1.5 + 1.75% of the amount over $350	Mid-market exchange rate	n/a

Product[1]	Purchase/Monthly/Annual fees	ATM access	Foreign exchange fees	Other fees
EQ Bank Card	$0	ATM fee reimbursement for domestic ATMs up to 5 times per month, with a maximum of $5 per withdrawal	MC conversion rate + 0%	None
Neo Prepaid Mastercard	$0	Free (except third parties)	MC conversion rate + 2.5%	None
Wealthsimple Prepaid Mastercard	$0	Free (except third parties)	MC conversion rate	None
BMO Prepaid Mastercard Linked or not linked to bank account	$9.99 annual fee	$5 per transaction	MC conversion rate + 2.5%	Refund: $3/direct deposit; $10/cheque Inactive fee: $5/month
MyVanilla*	$3.95 purchase fee	N/A	2.5%	$3.95 monthly account maintenance fee at the beginning of the 13th month after purchase
Joker Prepaid Visa*	Purchase fee from $4.95 to $9.95 depending on value	N/A	Visa conversion rate + 2.5%	Verified Cardholder fee: $2.50 (optional)
Virtual Joker Prepaid Visa*	Purchase fee $7.95	N/A	Visa conversion rate + 2.5%	N/A
Vanilla Prepaid Visa*	Purchase fee from $4.95 to $8.95 depending on value	N/A	Visa conversion rate + 2.5%	N/A

Product[1]	Purchase/Monthly/Annual fees	ATM access	Foreign exchange fees	Other fees
Vanilla Prepaid Mastercard*	Purchase fee from $4.95 to $7.95 depending on value	N/A	Mastercard conversion rate + 2.5%	N/A
RBC Right Pay Visa	$0 (only offered to social assistance recipients)	RBC ATMs: 4 free transactions/month; then $2/transaction Non-RBC ATMs in Canada: $2/withdrawal (plus operator convenience fee) ATMs outside Canada: $5/withdrawal (plus operator convenience fee)	2.5%	Balance inquiries at RBC ATMs: 2 free transactions/month; additional inquiries $0.50 each Inactivity fee: $2.50/month after 12 consecutive months of inactivity

1 The products listed are reloadable, except those marked with an asterisk.

Annex 6: G20/OECD High-Level Principles on Financial Consumer Protection and World Bank's Good Practices for Financial Consumer Protection

The *G20/OECD High-Level Principles on Financial Consumer Protection* provide internationally recognized guidance on financial-consumer protection. Included under Principle 7 (Disclosure and Transparency):

- Financial institutions should provide consumers with key information about a product's benefits, risks, and terms in a way that supports understanding and comparison
- Financial institutions should provide information on conflicts of interest associated with the intermediaries through which the product is sold
- All promotional material should be accurate, honest, understandable, transparent, and not misleading
- Standard pre-contractual disclosure practices such as forms should be adopted where possible to allow comparisons between products and services of the same nature
- Specific disclosure mechanisms such as warnings should be developed to provide information commensurate with the complexity and riskiness of products and services

The World Bank's 2017 *Good Practices for Financial Consumer Protection* outline a set of best practices for disclosure and transparency across various financial products and services, including deposit and credit products and services, insurance, private pensions, securities, retail payment services, and credit reporting systems. It is a summary that focuses on practices related to deposit accounts. Best practices for retail payment services are broadly aligned with the components outlined below.

Format and manner of disclosure

This component addresses how information is presented, including writing style, timing, and use of visual elements:

- Communications should be in plain and easily understandable language
- Written communications should use font size, spacing, and placement that are easy for the average person to read
- Documents should be provided in a written form that can be kept or saved
- Key product or service features should be clearly highlighted
- The regulatory framework should specify the timing of key disclosures

- Regulators should define standardized methods for calculating total cost and total net return
- Communications should disclose the regulatory status of the financial service provider and provide contact details for internal and external complaint-handling mechanisms

Advertising and sales materials

This component establishes minimum standards for promotional materials:

- Advertising and sales materials should not contain misleading or false information, or omit information that is important to a consumer's decision to purchase a product or service
- Financial service providers should bear legal responsibility for all representations made in advertising and sales materials

Disclosure of terms and conditions

- Terms and conditions should include:
  - the financial service provider's regulatory status
  - the rights and responsibilities of consumers, including termination conditions
  - the rights and responsibilities of the financial service provider
  - all applicable interest rates, costs, fees, and charges (including from third parties) that might arise, when they can be applied, and how they are calculated
  - how and when terms and conditions can be altered unilaterally by the financial service provider
  - whether and how consumers will be notified of changes to terms and conditions
  - penalties and other remedies that the financial service provider may seek to impose in the event of a breach of the agreement by the consumer
  - contact information for the financial service provider's customer service
  - information and contact details relating to internal and external complaint-handling mechanisms
- A printed or electronic copy should be provided
- The regulatory framework should require specific disclosures based on the type of product
- Financial service providers should use Key Facts Statements (see below)
- Financial service providers should explain key terms orally on request

Key Facts Statements

Financial service providers should be required to produce Key Facts Statements that summarize the main characteristics of common retail deposit accounts. Minimum standards for Key Facts Statements include that they should be:

- concise (1–2 pages) and written in plain language
- based on a standardized format, content and formulas

Key Facts Statements should be signed by consumers and should be given prominent placement when attached to an agreement.

Written account statements

Financial service providers should provide periodic written account statements free of charge.

Statements should list all transactions (dates and values), opening and closing balances, interest rates, fees, and penalties. This information should also be available to consumers upon request.

A final statement should be issued when an account is closed.

Notification of changes

- Financial service providers should provide advance notice of changes to:
  - interest rates
  - non-interest charges
  - other key product and service features or previously agreed-to terms and conditions
- Financial service providers should notify consumers when their accounts become inactive or dormant
- The length and format of a notice should be determined by the nature of the change and its impact on the consumer
- If revised terms and conditions are not acceptable to a consumer, regulatory conditions should guarantee the consumer’s right to exit the agreement without penalty

Annex 7: Effectiveness of disclosure and limitations

In 2019, the Australian Securities and Investments Commission (ASIC) and the Dutch Authority for the Financial Markets (AFM) published a joint report on the effectiveness of disclosure and its limitations.[34] The report uses case studies in a variety of financial markets, including Australia, the Netherlands, and other jurisdictions.

The report's case studies suggest that while mandatory disclosure remains an important component of consumer-protection frameworks, it does not consistently result in consumers being well informed, nor does it always lead to better consumer outcomes on its own. The report identifies several factors that can limit the effectiveness of disclosure:

Financial markets are inherently complex, and simplifying disclosures does not eliminate this underlying complexity.

Consumers receive information from many sources that compete for their attention and influence decision-making. Disclosures themselves add to this competition for consumers' attention.

Standardized disclosure requirements apply broadly, while consumer behaviour is shaped by individual circumstances and contextual factors.

Warnings, while widely used, do not always improve understanding of risks or influence behaviour as intended.

In some cases, disclosure may have unintended effects that do not improve outcomes for all consumers.

Complexity of financial markets

Decisions about financial products are often complex, and financial service providers may structure products, pricing, and processes in ways that add to this complexity. Examples include product and price bundling, opaque discounts, unclear fee descriptions, and design features that make switching more difficult.

In this context, efforts to simplify disclosures can involve trade-offs. While clearer language can improve accessibility, simplification may also risk omitting information that could be relevant for some consumers. In many cases, simplification addresses how information is presented rather than the complexity of the underlying concepts, which may still require a level of financial knowledge to interpret.

Limited attention

Only a minority of consumers pay attention to disclosure documents. Many consumers report that disclosure documents are long, complex, and use difficult and technical language. Other consumers

[34] Australian Securities and Investments Commission. (2019). *REP 632: Disclosure: Why it shouldn't be the default*.

report that these documents did not provide relevant, actionable information and that they have to skip large parts of the documents to find what they consider to be relevant.

Financial service providers also influence how consumers engage with information. Advertising, marketing, and the design of choice environments may draw attention away from disclosures or encourage quick decision-making. Timing and presentation of offers may further reduce the likelihood that consumers will focus on disclosure content.

Contextual factors

Consumers differ in their decision-making styles, information needs, and sources of advice. The context in which information is provided—including the delivery channel, physical or digital environment, and the consumer's emotional state—can affect how information is received and used. As most disclosures are standardized, they may not fully reflect these differences or meet the needs of all consumers equally well.

Unexpected outcomes

In some situations, disclosure can influence behaviour in unexpected ways. For example, disclosure of conflicts of interest may increase trust rather than prompt caution, or information about minimum repayment amounts may lead some consumers to repay less than they otherwise would. These outcomes highlight the importance of considering behavioural responses when designing disclosure requirements.

The effectiveness of warnings

Warnings have become a commonly used regulatory tool, but their effectiveness can vary. Consumers may overlook or misunderstand warnings, particularly in environments where warnings and notifications are frequent. Over time, repeated exposure may reduce their impact, a phenomenon often referred to as "warning fatigue."

Annex 8: Recent disclosure reforms to the investment market in Canada

The Canadian Securities Administrators (CSA) implemented reforms designed to strengthen investor protection by improving transparency, accountability, and investor understanding of investment costs, performance, and advisor relationships. The reforms respond to concerns about information asymmetries in the investment market, particularly around fees and compensation, and the difficulty investors face in understanding how costs affect returns over time.

Reforms were introduced in phases, with a first phase of changes—Client Relationship Model phase 2 (CRM2)—implemented between 2013 and 2017, and a second phase of changes—Client Relationship Model phase 3 (CRM3)—finalized in 2024 and coming into force in 2026. Together, the 2 phases of reforms represent a shift toward clearer, more personalized, and outcome-focused disclosure in Canada's investment sector.

CRM2: Improving fee and performance transparency

CRM2 focused on enhancing the quality and usefulness of the information investors receive from their dealers and advisors. Key elements included:

- **Annual charges and compensation reports**, requiring firms to disclose, in dollar terms, the direct fees and compensation paid by customers to their dealer or advisor over the year
- **Enhanced performance reporting**, requiring personalized annual and quarterly reports showing account-level returns using standardized methodologies
- **Improved relationship disclosure**, clarifying the nature of the client–advisor relationship, including account types, services provided, and suitability obligations

The objective of CRM2 was to help investors better understand what they are paying, how their investments are performing, and what services they receive in return. Evaluations found that CRM2 improved fee awareness, understanding, and investor engagement over time. Some evidence also pointed to behavioral responses, including increased discussions with advisors, shifts toward lower cost products, and changes in fee structures within the industry.

At the same time, regulatory reviews identified limitations. Not all investors noticed or engaged with the new reports, and some found them difficult to interpret or act upon, highlighting the persistent challenges of disclosure-based approaches.

CRM3: Closing key information gaps

CRM3, also referred to as Total Cost Reporting (TCR), seeks to address a critical gap: the lack of clear, investor-specific information on indirect fund costs, such as management expense ratios (MERs) and other ongoing fund expenses.

Under CRM3, firms will be required to report to investors, in dollar terms:

- the total amount paid in fund expenses across all holdings
- the total amount paid in direct charges, such as transaction or redemption fees
- the fund expense ratio (FER) for each investment fund
- comparable cost information for segregated funds, including insurance and guarantee costs

These disclosures must be personalized, clearly presented, and integrated into existing annual reporting. Investors are expected to receive their first CRM3-compliant reports for the year ending December 31, 2026.

Combined impact of CRM2 and CRM3

Taken together, these reforms represent an evolution in Canadian investment disclosure. The reforms move beyond abstract percentages and generic documents toward personalized, dollar-based reporting that makes costs more visible and comparable. While disclosure alone cannot eliminate complexity or guarantee better decisions, the CSA's CRM reforms provide a stronger foundation for investors' understanding, engagement, and informed choice. They offer important lessons for transparency initiatives in other financial sectors.

Annex 9: Overdraft fees

United Kingdom

In 2019, the UK implemented a comprehensive regulatory framework for overdraft fees. UK regulators identified persistent consumer harm arising from complex pricing, high charges for unarranged overdrafts, and repeated use concentrated among a small share of consumers.

Key elements of the UK approach include:

- a requirement that banks charge overdrafts using a single interest rate; fixed daily or monthly overdraft fees are prohibited
- unarranged overdrafts cannot be priced higher than arranged overdrafts, eliminating penalty-style pricing for exceeding limits
- consumers are automatically enrolled in overdraft alerts when they enter into an overdraft agreement or are at risk of incurring charges
- banks must identify customers who use overdrafts frequently or persistently, and must proactively engage with them to help reduce reliance on overdrafts, including offering alternatives where appropriate
- banks must prominently publish representative annual percentage rate (APR) ranges and standardized overdraft pricing tables, updated quarterly

Post-implementation reviews by the UK Financial Conduct Authority found that these measures reduced overall overdraft costs and charges for consumers with low incomes or persistent overdraft use. The UK model places less emphasis on price caps and more on simplified pricing, comparability, and active intervention.

United States

In the United States, overdraft regulation has evolved through a combination of supervisory guidance, enforcement actions, disclosure requirements, and market-driven reforms, rather than comprehensive federal price controls.

Beginning in 2015, large banks were required to report overdraft and NSF fee revenue.

Between 2019 and 2023, the Consumer Financial Protection Bureau (CFPB) publicly raised concerns about overdraft fee practices through supervisory examinations, enforcement actions, and research publications. The CFPB found that overdraft fee revenue fell by roughly $4 billion from 2019 to 2023 at financial service providers with more than $1 billion in total assets.

In 2023, the Office of the Comptroller of the Currency (OCC) issued a bulletin highlighting compliance, operational and credit risks associated with overdraft protection programs, including practices such as

charging multiple fees on re-presented payments and high limits or lack of daily limits on the number of fees assessed.

In 2024, the CFPB introduced a new rule requiring financial service providers with more than $10 billion in assets to treat overdraft services as a form of credit, with full consumer credit protections unless the overdraft fee is $5 or less or only covers the provider's actual costs and losses.

Annex 10: Market scans of chequing accounts in Canada

Information in this Annex reflects publicly available information as of August 31, 2026. Of note:

- Values may change for account holders who meet certain criteria (e.g., fees may be lower for students, seniors, etc.)
- This annex does not contain a comprehensive list of all available personal deposit accounts; it is limited to personal chequing accounts denominated in Canadian dollars that are available for sale to all consumers (i.e., does not include grandfathered or legacy products)
- to all consumers (i.e., accounts targeted to specific consumer segments were removed)
- This annex does not contain a comprehensive list of all account features, and certain omitted features could explain price differences
- Some institutions may use a relationship-based model or offer other promotions to waive or reduce certain fees
- Some accounts may have separate limits for digital/online/self-serve transactions versus in-branch transactions
- Excess transaction fees, while usually $1.25 each, may vary by transaction type at some institutions. Additionally, some institutions offer unlimited transactions for certain types of transactions (e.g., public transit purchases)
- ATM fees reflect the cost of domestic cash withdrawals only. Institutions that are part of THE EXCHANGE Network may not charge a fee to consumers using other ATMs on THE EXCHANGE Network, even if the ATM is owned by another financial institution.

Table 17. Market snapshot of chequing accounts at Big Six banks

Financial institution	Account	Maintenance fee	Minimum daily balance to waive maintenance fee	Transaction limit	Separate Interac e-transfer limit (if applicable)	ATM network access fee
Bank of Montreal	Practical	$4.00	-	12	-	$2.00
Bank of Montreal	Plus	$12.95	$3,000	25	-	$2.00
Bank of Montreal	Performance	$17.95	$4,000	Unlimited	-	1 Free (then $2.00)
Bank of Montreal	Blue Rewards Plan	$17.95	-	Unlimited	-	$2.00
Bank of Montreal	Premium	$30.95	$6,000	Unlimited	-	$0.00
Bank of Nova Scotia	Basic Bank Account	$3.95	-	18	-	$2.00
Bank of Nova Scotia	Basic Plus Bank Account	$11.95	$3,000	25	-	$2.00

Bank of Nova Scotia	Preferred Package	$16.95	$4,000	Unlimited	-	1 Free (then $2.00)
Bank of Nova Scotia	Ultimate Package	$30.95	$6,000	Unlimited	-	$0.00
Canadian Imperial Bank of Commerce	Everyday Chequing Account	$4.00	-	18	-	$2.00
Canadian Imperial Bank of Commerce	Smart Account	$16.95	$4,000	Unlimited	-	1 Free (then $2.00)
National Bank	The Minimalist	$3.95	-	18 (digital only)	-	$2.00
National Bank	The Connected	$15.95	$4,500	Unlimited (digital only)	-	$2.00
National Bank	The Total	$28.95	$6,000	Unlimited	-	$0.00
Royal Bank of Canada	Day to Day Banking	$4.00	-	12	Unlimited	$2.00
Royal Bank of Canada	Advantage Banking	$12.95	-	Unlimited	-	$0.00
Royal Bank of Canada	Signature No Limit Banking	$16.95	-	Unlimited	-	3 free (then $2.00)
Royal Bank of Canada	VIP Banking	$30.00	-	Unlimited	-	$0.00
Toronto-Dominion Bank	Minimum Chequing Account	$3.95	-	12	-	$2.00
Toronto-Dominion Bank	Every Day Chequing Account	$11.95	$3,000	25	-	$2.00
Toronto-Dominion Bank	Unlimited Chequing Account	$17.95	$4,000	Unlimited	-	$0.00
Toronto-Dominion Bank	All-Inclusive Banking Plan	$30.95	$6,000	Unlimited	-	$0.00

Table 18. Market snapshot of chequing accounts at small and medium-sized banks

Financial institution	Account	Maintenance fee	Minimum daily balance to waive maintenance fee	Transaction limit	Separate Interac e-transfer limit (if applicable)	Interac ATM network access fee
Bank of China (Canada)	Basic Chequing Account	$4.00	$1,000	12	4	$0.00
Bank of China (Canada)	Premium Chequing Account	$23.00	$5,000	Unlimited	-	$0.00
Coast Capital Savings	Free Chequing, Free Debit, and More Account	$0	-	Unlimited	0	$2.50

Coast Capital Savings	Coast Capital Unlimited Chequing Account	$8.50	$4,000	Unlimited	-	$2.50
Coast Capital Savings	Coast Capital Elevate Chequing Account	$16.95	$4,000	Unlimited	-	2 Free (then $2.50)
CTBC Bank	CAD Personal Regular Chequing Account	$5.00	$1,000	0	-	Information not available
First Nations Bank of Canada	Value	$3.95	$1,500	12	0	$2.00
First Nations Bank of Canada	Value Plus	$11.95	$3,000	25	2	$2.00
First Nations Bank of Canada	Infinity	$16.95	$4,000	Unlimited	5	$2.00
First Nations Bank of Canada	Select	$29.95	$5,000	Unlimited	-	$0.00
Habib Canadian Bank	Chequing Account	$0	-	0	-	$1.25
ICICI Bank	Basic Chequing Account	$4.00	-	Unlimited	Unlimited	$1.50
ICICI Bank	HiVALUE Chequing Account	$9.95	$3,000	Unlimited	Unlimited	$1.50
ICICI Bank	HiVALUE PLUS Chequing Account	$21.95	-	Unlimited	Unlimited	$0.00
Innovation Federal Credit Union	No-Fee Chequing Account	$0	-	Unlimited	-	$2.50
Laurentian Bank	Basic Account	$4.00	-	18	0	$2.00
Laurentian Bank	Preferred Account	$7.50	-	20	0	$2.00
Laurentian Bank	Unlimited Account	$14.75	-	Unlimited	N/A	$2.00
SBI Canada Bank	Chequing	$4.00	$1,000	Unlimited	-	Information not available
Shinhan Bank (Canada)	Package 1	$3.00	$500	15	-	$1.50
Shinhan Bank (Canada)	Package 2	$5.00	$1,000	20	-	$1.50
Shinhan Bank (Canada)	Package 3	$8.00	$2,000	30	-	$1.50
Shinhan Bank (Canada)	Package 4	$10.00	$3,000	45	-	$1.50
Shinhan Bank (Canada)	Package 5	$20.00	$5,000	Unlimited	-	$1.50

Tru Cooperative Bank	Tru Essentials	$0	-	12	-	$2.50
UNI Financial Cooperation	The Basic	$3.95	-	12	Unlimited	$1.50
UNI Financial Cooperation	The Intermediate	$12.95	$3,000	30	Unlimited	$1.50
UNI Financial Cooperation	The Unlimited	$16.95	$4,000	Unlimited	-	$1.50
UNI Financial Cooperation	The Unlimited Plus	$29.95	$6,000	Unlimited	-	$1.50

Table 19. Market snapshot of chequing accounts at provincially regulated financial institutions

Financial institution	Account	Maintenance fee	Minimum daily balance to waive maintenance fee	Transaction limit	Separate Interac e-transfer limit (if applicable)	Interac ATM network access fee
Access Credit Union	Pay As You Go Chequing	$0	-	0	-	$2.00
Access Credit Union	Basic+ Chequing	$8.00	$2,500	30	10	$2.00
Access Credit Union	Green Chequing	$9.00	-	Unlimited (digital only)	-	$2.00
Access Credit Union	Unlimited Chequing	$17.00	-	Unlimited	-	$2.00
Affinity Credit Union	Pay-As-You-Go Chequing	$0	-	0	-	$2.00
Affinity Credit Union	Value Chequing	$4.00	-	12	2	$2.00
Affinity Credit Union	Unlimited Chequing	$13.00	-	Unlimited	-	$2.00
Alterna Savings	Pay as you go	$0	-	0	-	$2.00
Alterna Savings	Basic	$4.00	$1,000	20	-	$2.00
Alterna Savings	Value	$10.00	-	35	-	$2.00
Alterna Savings	Unlimited	$14.00	-	Unlimited	-	1 free (then $2.00)
Assiniboine Credit Union	ACU Light	$0	-	0	-	$2.00
Assiniboine Credit Union	ACU Essentials	$4.00	-	16	2	$2.00

Assiniboine Credit Union	ACU Active	$9.00	$2,500	40	5	$2.00
Assiniboine Credit Union	ACU Digital	$11.00	$3,500	Unlimited (self-serve only)	30	$2.00
Assiniboine Credit Union	ACU Unlimited	$17.00	$5,000	Unlimited	30	4 free (then $2.00)
Alberta Treasury Branches	No-Fee All-In Digital Account	$0	-	Unlimited (digital only)	-	$2.00
Alberta Treasury Branches	Pay As You Go Account	$0	-	0	-	$2.00
Alberta Treasury Branches	Basic Account	$3.95	-	15	-	$2.00
Alberta Treasury Branches	Unlimited Account	$15.95	$4,000	Unlimited	-	$2.00
Alberta Treasury Branches	ATB Advantage	$24.95	$6,000	Unlimited	-	$2.00
Beem Credit Union	Essentials	$0	-	15	-	$2.00
Beem Credit Union	Everyday	$4.95	-	Unlimited	-	$2.00
Beem Credit Union	Unlimited	$9.95	-	Unlimited	-	$2.00
Caisse Alliance	Basic Plan	$3.95	$1,499.99	12	-	$1.00
Caisse Alliance	Intermediate Plan	$8.95	$2,499.99	30	-	$1.00
Caisse Alliance	Unlimited Plan	$13.95	$3,999.99	Unlimited	-	$1.00
Caisse Alliance	Unlimited Plus Plan	$21.95	$4,999.99	Unlimited	-	$1.00
Cambrian Credit Union	Standard Chequing	$0	-	0	0	$2.00
Cambrian Credit Union	Basic Chequing	$9.50	-	30	3	2 free (then $2.00)
Cambrian Credit Union	Premium Chequing Account	$19.50	-	Unlimited	10	$2.00
Coastal Community Credit Union	Pay As You Go Chequing	$0	-	0	-	Information not available
Coastal Community Credit Union	Chequing Plus	$3.95	$1,000	Unlimited	-	Information not available
Coastal Community Credit Union	Express Chequing	$5.95	-	40 (self-serve only)	-	Information not available

Coastal Community Credit Union	Access Chequing	$7.95	-	25	-	Information not available
Coastal Community Credit Union	Express Unlimited Chequing	$9.95	-	Unlimited (self-serve only)	-	Information not available
Coastal Community Credit Union	Access Plus Chequing	$11.95	-	40	-	Information not available
Coastal Community Credit Union	Access Unlimited Chequing	$14.95	-	Unlimited	-	Information not available
Conexus Credit Union	No-Fee Chequing	$0	-	Unlimited	30	$2.50
Cornerstone Credit Union	Low Fee Account	$4.00	-	12	Unlimited	$3.00
Cornerstone Credit Union	Everyday Account	$10.00	-	25	Unlimited	$3.00
Cornerstone Credit Union	Unlimited Account	$15.00	-	Unlimited	-	$3.00
Desjardins	Basic Plan	$3.95	$1,500	12	-	$1.50
Desjardins	Intermediate Plan	$10.95	$3,000	30	-	$1.50
Desjardins	Unlimited Plan	$15.95	$4,000	Unlimited	-	$1.50
Desjardins	Unlimited Plus Plan	$23.95	$5,000	Unlimited	-	$1.50
DUCA Credit Union	No Fee* Banking	$4.00	$1,000	Unlimited	5	$2.00
DUCA Credit Union	Premium Banking	$15.00	-	Unlimited	5	5 Free (then $2.00)
First Ontario Credit Union	Pay As You Go	$0	-	0	-	$3.50
First Ontario Credit Union	Premium	$13.95	$4,000	Unlimited	10	$3.50
First Ontario Credit Union	Premium Unlimited	$19.95	$6,000	Unlimited	-	$0.00
Kawartha Financial Services	Pay As You Go	$0	-	0	-	$2.00
Kawartha Financial Services	Essentials Package	$10	$2,000	Unlimited (self-serve only)	0	$2.00
Kawartha Financial Services	Convenience Package	$15	$3,000	Unlimited	-	$2.00
Kindred Credit Union	Flex	$0	$3,000	0	-	$1.50

Kindred Credit Union	Value	$11.45	$3,000	25	-	$1.50
Kindred Credit Union	Unlimited	$17.95	$3,000	Unlimited	-	$0.00
Libro Credit Union	Basic	$4.00	$1,000	12	0	5 Free (then $1.00)
Libro Credit Union	Simplify	$14.00	$2,500	Unlimited	-	5 Free (then $1.00)
Libro Credit Union	Premium	$25.00	$75,000	Unlimited	-	$0.00
Meridian	Essential	$3.00	-	20	4	$2.00
Meridian	Everyday	$9.00	$2,000	30	6	$2.00
Meridian	Digital	$14.00	$3,000	Unlimited	99	$2.00
Meridian	Unlimited	$19.00	$5,000	Unlimited	99	$2.00
Prospera Credit Union	Essential Account	$3.50	-	10	2	$2.50
Prospera Credit Union	Unlimited Account	$10.00	-	Unlimited	-	$2.50
Servus Credit Union	Basic Plan	$3.95	-	18	-	$1.50
Servus Credit Union	Personal Essential Plan	$16.95	$4,000	Unlimited	-	2 Free (then $1.50)
Servus Credit Union	Personal Premium Unlimited Plan	$25.00	$5,000	Unlimited	-	10 Free (then $1.50)
Steinbach Credit Union	Standard Pack Chequing	$0	-	0	-	$1.50
Steinbach Credit Union	E-Pack Chequing	$5.50	-	15	5	$1.50
Steinbach Credit Union	Value Pack Chequing	$9.95	-	35	5	$1.50
Steinbach Credit Union	Classic Pack Chequing	$17.00	-	Unlimited	10	$1.50
Vancity	Pay as you go	$0	-	0	-	$2.00
Vancity	Essential Chequing	$9.75	$1,500	25	Unlimited	$2.00
Vancity	Essential Plus Chequing	$14.75	$3,000	Unlimited	-	$2.00
Vancity	Vancity Total Chequing	$25.75	$6,000	Unlimited	-	$2.00

Vision Credit Union	Everyday Essentials	$4.00	-	10	-	$2.00
Vision Credit Union	Virtual Advantage	$8.50	-	Unlimited (online only)	-	$2.00
Vision Credit Union	Everyday Select	$15.00	-	50	-	$2.00
Vision Credit Union	Everyday Premium	$21.00	$5,000	Unlimited	-	$2.00
Windsor Family Credit Union	EVA Silver Chequing Account	$5.00	$1,000	Unlimited	Information not available	$0.00
Windsor Family Credit Union	EVA Gold Chequing Account	$6.50	-	Unlimited	-	$0.00
Windsor Family Credit Union	EVA Diamond Chequing Account	$10.00	-	Unlimited	-	$0.00
Windsor Family Credit Union	EVA Platinum Chequing Account	$15.00	-	Unlimited	-	$0.00
Your Neighbourhood Credit Union	Simply Free Chequing Account	$0	-	12	Unlimited	$2.00
Your Neighbourhood Credit Union	Simply Starter Chequing Account	$6.95	-	Unlimited	-	$2.00
Your Neighbourhood Credit Union	E-All Access Chequing Account	$7.95	-	Unlimited	-	$2.00
Your Neighbourhood Credit Union	Simply Plus Chequing Account	$12.95	$3,000	50	Unlimited	$2.00
Your Neighbourhood Credit Union	100% Local Chequing Account	$18.95	$5,000	Unlimited	-	$2.00
Your Neighbourhood Credit Union	Home Free Chequing Account	$19.50	-	Unlimited	-	$2.00

Table 20. Market snapshot of digital banking products

Financial institution	Account	Maintenance fee	Minimum daily balance to waive maintenance fee	Transaction limit	Separate Interac e-transfer limit (if applicable)	ATM network access fee
Alterna Bank	No-Fee eChequing Account	$0	-	Unlimited	-	$1.90
EQ Bank	Personal Account	$0	-	Unlimited	-	$0
President's Choice Financial	PC Money Account	$0	-	Unlimited	-	$1.50

Simplii Financial	No Fee Chequing Account	$0	-	Unlimited	-	$1.50
Tangerine	No-fee Daily Chequing Account	$0	-	Unlimited	-	$1.50

Table 21. Market snapshot of fintech products

Financial institution	Account	Maintenance fee	Minimum daily balance to waive maintenance fee	Transaction limit	Separate Interac e-transfer limit (if applicable)	ATM network access fee
KOHO	Essential	$4	-	Unlimited	-	$0
KOHO	Extra	$12.00	-	Unlimited	-	$0
KOHO	Everything	$14.75	-	Unlimited	-	$0
Neo Financial	Neo Chequing	$0	-	Unlimited	-	$0
Wealthsimple	Chequing Account	$0	-	Unlimited	-	$0

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