



February 10, 2023

Department of Finance Canada  
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Ottawa, Ontario  
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Sent via email: [Budget2023@fin.gc.ca](mailto:Budget2023@fin.gc.ca)

Re: 2023 Pre-Budget Consultations

Dear Department Officials,

Fertility Matters Canada (FMC) welcomes this opportunity to make a 2023 Pre-Budget consultation submission encouraging the Federal Government to contribute to the funding of fertility treatments and reproductive assistance for the growing number of Canadians struggling with infertility. This is an issue that the federal government has identified as a mandate priority for two members of Federal Cabinet, and which has broad multi-party support.

Both the Minister of Health and the Minister of Women and Gender Equality and Youth are mandated to:

*“Work to ensure that all Canadians have access to the sexual and reproductive health services they need, no matter where they live, by reinforcing compliance under the Canada Health Act, developing a sexual and reproductive health rights information portal, supporting the establishment of mechanisms to help families cover the costs of in vitro fertilization, and supporting youth-led grassroots organizations that respond to the unique sexual and reproductive health needs of young people.”*

Through the creation and implementation of a National Fertility Strategy, FMC seeks to enable the improved access to fertility care, regardless of where you live in Canada. Unlike insurable, “medically necessary” services under the Canada Health Act, fertility care in Canada today does not benefit from the effects of the five pillars of the Canada Health Act (i.e., public administration, comprehensiveness, universality, portability, and accessibility).

Yet, according to the Statistics Canada, Canada’s fertility rate has declined by 15% since 2010. In the midst of a historic labour shortage, the inability for Canadians experiencing infertility to have children could exacerbate the social, economic, and public policy pressures that stem from this challenge. Our

goal is therefore to build a secure, sustainable future for a thriving workforce free to pursue family objectives as effectively as professional ones.

We know that our goals align well with your budget's target of a "more competitive, more innovative, more inclusive, and resilient Canada." As this submission will describe, we recommend that the government:

1. Assign initial exploratory funding for the creation of a framework that identifies the scope of the need for fertility treatment in Canada.
2. Unlock the benefits of increased fertility for economic competitiveness and inclusivity.
3. Create and fund a National Fertility Strategy to meet the need.
4. Work with the provinces and territories to implement the National Fertility Strategy in a way that ensures both universality of access, and flexibility for each province and territory to determine how best to deliver fertility and reproductive assistance.

## About FMC

FMC grew out of a volunteer group in Ottawa called the Infertility Self Support Group (ISSG), which began in 1983. Today, FMC is a national charitable organization, providing information, education, and support to individuals and couples who are struggling to build their family or who need to access fertility care. FMC exists today to meet needs that may go unaddressed in the course of medical treatment, to reach out to those who may not be aware of the treatment options available, and to raise public awareness of (in)fertility and the difficulty for some to access treatment. At FMC, we reach out to provide help on many levels. Front line assistance is a key part of FMC's mission.

## Identifying the Scope of Need

In Canada, one in six heterosexual couples experience infertility. Additionally, many members of the 2SLGBTQI+ community and single individuals require access to fertility care to start their family. Yet, in Canada's provinces and territories, we do not have equality of access to treatment. The cost for treatment is approximately \$10,000 to \$20,000 per cycle. As recently reported,<sup>1</sup> seven of Canada's provinces provide various unequal forms of financial help for people needing treatment for infertility:

- Ontario funds one IVF cycle for women up to age 42. There is no limit on age or the number of treatment cycles for intrauterine insemination (IUI). The province does not cover medications, which it says are about \$5,000 per IVF cycle.
- In Quebec, one IVF cycle is funded for women up to age 41. It also pays for medications as well as freezing and storage of extra embryos for a year.

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<sup>1</sup> [https://www.thestar.com/life/health\\_wellness/2022/12/20/what-fertility-treatment-coverage-is-offered-by-canadas-provinces-and-territories.html](https://www.thestar.com/life/health_wellness/2022/12/20/what-fertility-treatment-coverage-is-offered-by-canadas-provinces-and-territories.html)

- Manitoba offers a tax credit equal to 40 per cent of the cost of fertility treatments. Up to \$20,000 annually in eligible costs can be claimed, for a maximum annual tax credit of \$8,000. There is no limit on the number of treatments.
- Nova Scotia provides the same tax credit as Manitoba and recently extended that benefit for surrogacy expenses.
- Residents of Prince Edward Island are eligible for reimbursement of between \$5,000 and \$10,000 annually for IVF and/or IUI, including medication, based on family income. Treatment is not available in the province so people can submit a claim after having it elsewhere in Canada. Funding is available up to three times.
- In Newfoundland and Labrador, there is some treatment available in the provinces, but the IVF Subsidy Program offers \$5,000 per cycle to people who must travel elsewhere in the country for IVF. They can then submit a claim for reimbursement.
- New Brunswick residents can claim up to 50 per cent of costs for in vitro fertilization or intrauterine insemination procedures as well as medication, up to a maximum of \$5,000 as part of a one-time grant.
- British Columbia, Alberta, Saskatchewan, and the territories – where 29% of our country’s residents live – do not cover the cost of procedures like IVF or IUI.

## Unlock the Benefits of Publicly Funded Fertility Treatment

At a time of great demographic shift in countries like Canada, with falling birth rates and aging populations, immigration alone is not enough to ensure a stable economy and access to labour. There is an opportunity for Canada to make good on the connection between inclusive reproductive health and competitive economic impact.

Reap the reputational, recruitment, and long-term economic rewards for helping your workforce, families, and communities transition from ...		
<b>Economic barriers to fertility treatment and parenthood</b>	<b>➔</b>	<b>Fertility fairness and the hope of fulfilling family objectives</b>
<b>Declining fertility exacerbating long-term labour shortages</b>	<b>➔</b>	<b>Mitigating labour-market risk and expanding the talent pool</b>
<b>Regional asymmetry in fertility access</b>	<b>➔</b>	<b>National consistency in fertility access across the workforce</b>

Francesca Scala, Associate Professor of Public Policy in the Department of Political Science at Concordia University, and author of *Delivering Policy: The Contested Politics of Assisted Reproductive Technologies in Canada* has pointed to four key benefits of publicly funded fertility treatment in Canada:<sup>2</sup>

1. Fixing the problem of infertility treatment having been turned into a private commodity rather than a medical service, with the attendant problems of unequal access based on wealth and other socio-economic factors.
2. Ensuring a minimal level of oversight of clinics, which will improve safety and quality of services and could lower health care costs in the long term because governments could impose restrictions, such as single-embryo transfer.
3. Establish more consistent, uniform, and transparent eligibility criteria across clinics located in the same jurisdiction.
4. Help ensure that clinics provide services that do not reinforce health inequities based on race, ethnicity, gender identity, and sexual orientation.

## Create and Fund a National Fertility Strategy

The creation and implementation of a National Child Care Strategy for \$10 daycare across the country is a game-changer for families. We hope that this ambitious realization of federal-provincial-territorial cooperation can be a template for a National Fertility Strategy as well.

While health care is a provincial jurisdiction, we know that there is a role to play for the federal government as well, such as enforcement of the *Canada Health Act*. Unfortunately, while this Act mandates the provinces to provide treatments and services that are “medically necessary,” there is no definition of this term in the Act. Therefore, as Francesca Scala notes, “part of the reason why IVF is not publicly funded is that although infertility is understood to be a medical condition, IVF is not considered a medical necessity.” We urge the federal government to work with the provinces to close this loophole and recognize the reality of fertility as a medical necessity.

There is also a role for the government to play in outlining a vision for fertility access across the country that promotes diversity, equity, and inclusion, and lessens the negative mental health impacts that can come from infertility. There is also a role for the federal government to use its fiscal power to assist the provinces in funding universal access.

## Work with the Provinces and Territories to Implement the Strategy

Once again, the recent child care strategy showed that an ambitious national vision can be implemented in our federal system in a way that ensure flexibility for each province and territory. We know that different jurisdictions, including rural, remote, and Indigenous communities, have different on the ground realities. We urge the federal government to work with the provinces and territories to

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<sup>2</sup> <https://policyoptions.irpp.org/magazines/april-2019/publicly-fund-ivf-canada/>

implement the National Fertility Strategy in a way that ensures universality of access no matter where you live in Canada, but flexibility for each province and territory to determine how best to meet this need.

## Conclusion

Canada is a large resource-rich country with a small population. If we as a country want to ensure our place as a global leader in the 21<sup>st</sup> century, we are going to need the people—and their labour—to get us there in a way that reflects Canadian values of inclusivity. This is the opportunity that FMC is presenting to the Government of Canada as we seek universality of access to fertility treatment in our country.

We understand that this is a multi-year process. FMC and its partners across the country are ready to be a resource to work with Government and Members of Parliament throughout this process, both as an advisor on the policy, and to help secure support and buy-in from the stakeholder community. With an estimated 16 per cent of Canadian couples experiencing infertility—double the number now since the 1980s—the community seeking better access to fertility care and reproductive assistance is bigger than many may currently understand.

## Contact

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