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December 22, 2025

The Hon. François-Philippe Champagne, P.C., M.P.
Minister of Finance and National Revenue
Government of Canada

Via Email: fin.minfinance-financemin.fin@canada.ca

Re: NPF concerns with Part 5, Divisions 19 and 21 of Bill C-15

Dear Minister Champagne,

On behalf of the National Police Federation (NPF), and our Members, I am writing to seek additional clarification on certain measures contained in Part 5, Divisions 19 and 21 of Bill C-15, *the Budget 2025 Implementation Act*, that relate to RCMP pensions and disability benefits. As these measures have significant implications for our Members, we respectfully request detailed explanations to the items detailed below and clear assurances to provide our Members with the clarity and confidence they deserve.

As Canada's largest police union, the NPF represents nearly 20,000 RCMP Members serving communities across the country and internationally. Our Members have expressed deep concern with several provisions in Budget 2025 and Bill C-15, concerns that go to the heart of Members' financial security, disability benefits, medical privacy, and long-term trust in federal institutions and benefit systems.

We want to be clear: the NPF has serious concerns regarding changes to the *RCMP Superannuation Act* and related information-sharing authorities proposed in Bill C-15, as well as future legislative changes signalled in Budget 2025. While we have proactively met with federal departments in an effort to obtain clarity, the information provided to date, has not been sufficient, has not resolved key questions, and has not provided the assurances Members deserve. This lack of clarity is troubling and substantial changes of this nature demand complete transparency and scrutiny.

The following sections outline the NPF's key concerns, which relate to amendments to the *RCMP Superannuation Act*, anticipated future legislative changes affecting RCMP pension contributions, including CPP/QPP coordination, and the need for clarity, consultation, and safeguards to protect RCMP Members from unintended financial consequences.

1. Concerns with Division 21- Amendments to the RCMP Superannuation Act

Division 21 of Bill C-15 introduces additional amendments to the *Royal Canadian Mounted Police Superannuation Act* (RCMPSA) that, while intended to clarify administrative responsibilities, raise significant concerns regarding the protection of RCMP Members' medical privacy and the potential misuse of information.

We support the clarification in section 32.2 that confirms Veterans Affairs Canada (VAC) as the decision-maker for RCMP disability pension awards. This codifies existing practice and provides needed legislative clarity. However, the accompanying amendments in section 32.3 broaden information-sharing authorities in ways that may have unintended and serious consequences for serving Members.

Under these amendments, the VAC Minister, the Minister of Public Safety, and the RCMP Commissioner are expressly authorized to disclose information to one another “for the purposes of this Part,” and, further, VAC may disclose information to Public Safety and the RCMP Commissioner for the “administration and management of the Force.” These authorities are drafted broadly, contain no limiting definitions, and do not reference any privacy safeguards or restrictions on how Member medical information may be used.

Legislative amendments to section 32.3 should explicitly outline the one-way sharing of personal medical information from RCMP Health Services to VAC for disability claim adjudication, while limiting the return of medical information to the RCMP to only what is essential for the individual case, which includes the determination and diagnosis, the officer’s name, and regimental number. This would preserve VAC independence, protect Member privacy, and reinforce VAC as an impartial benefits administrator. Codifying this relationship would uphold confidence in the disability adjudication process by providing statutory clarity and safeguards that reassure RCMP Members of the protection of their medical privacy.

Without such clarity Members may become reluctant to report injuries or seek VAC support out of fear that doing so could negatively affect their careers. This would undermine workplace safety, lead to unreported or untreated injuries, and erode already fragile trust between Members and RCMP management. Ultimately, these risks could impact both Member wellbeing and public safety.

Given the absence of defined boundaries, privacy protections, or safeguards against misuse, the information-sharing provisions in Division 21 require careful scrutiny. We urge Parliament to ensure that any amendments respect Member privacy, protect against unintended employment consequences, and preserve confidence in the systems designed to support the health and safety of RCMP Members.

2. Concerns with Division 19- Amendments to the RCMP Superannuation Act

Bill C-15 proposes amendments to the RCMPSA that would significantly change how RCMP Member disability pension benefits received through VAC are indexed. Specifically, new section 34.1 would require that, beginning January 1, 2027, annual adjustments to certain benefits be based solely on the Consumer Price Index (CPI). This replaces the long-standing formula that uses the greater of CPI or average wage growth, a model that has historically protected Members during years when wage growth exceeded inflation.

This change applies only to the Membership of the RCMP. It does not apply to the Canadian Armed Forces (CAF), who will continue to receive pension indexation based on the greater of CPI or wage growth. Creating a CPI-only model exclusively for RCMP Members introduces an inequitable disparity between federal uniformed service disability pension plans administered through VAC. RCMP Members, who serve in one of Canada’s most demanding and diverse policing roles, often under conditions comparable to CAF personnel, would face a reduced level of protection against long-term erosion of their earned benefits.

In addition, new section 34.2 authorizes the Governor in Council to make regulations governing the implementation of the new CPI-only adjustment model and expressly permits such regulations to have retroactive effect. While the statutory amendment sets January 1, 2027, as the effective date for the CPI-

only rule, the ability to make retroactive regulations creates uncertainty about how and when adjustments may be applied. This could allow regulations adopted after 2027 to be backdated to January 1, 2027, potentially altering Members' expected indexation after the fact. It also provides broad discretion to define how CPI will be measured and applied, including retroactively.

Taken together, these amendments raise important concerns about fairness, predictability, and the long-term adequacy of RCMP pensions. We urge Parliament to ensure that Members' earned benefits are not diminished relative to those of other federal uniformed service personnel and that any reforms are implemented transparently and without retroactive impact.

3. Future Legislative Changes Affecting RCMP Pension Contributions (CPP/QPP Coordination) *(Not part of Bill C-15, but announced in Budget 2025 and expected in subsequent legislation)*

Budget 2025 announced the federal government's intention to initiate consultations on changes to the Public Service, CAF, and RCMP pension plans to account for the CPP/QPP enhancements implemented between 2019 and 2025. These enhancements expanded the benefits available under CPP/QPP, resulting in higher CPP/QPP contributions from both employees and the employer. However, the federal public sector pension plans, including the RCMPSA, were not adjusted to reflect this shift.

As a result, RCMP Members have been overcontributing to their pension plan since 2019, potentially by an estimated ~\$600 per Member, per year, simply because the plan has not yet been recalibrated to maintain the intended coordinated 2% pension benefit rate.

The government has now indicated its intention to correct this imbalance through future legislation. While this is positive, the details remain unclear, and the RCMP, through the NPF, must be included as a key stakeholder in these consultations. While we understand the NPF does not bargain pensions, we are a key stakeholder, nonetheless. Our Members deserve clarity and fairness in how their pension contributions and entitlements are managed, particularly after several years of over-payment.

To effectively inform and advocate for our Members, we request confirmation and clarity on the following:

- Whether the revised contribution rates will apply to all serving Members, regardless of enrolment date or service time.
- Whether past overcontributions since 2019 will be reimbursed, credited, or otherwise recognized for affected RCMP Members.
- How the recalibration will impact future retirement income, including the interaction between lifetime pension amounts, bridge benefits, and enhanced CPP/QPP entitlements.
- The projected implementation timeline and whether transitional measures will be required for Members approaching retirement.
- Whether actuarial analyses will be made public, including those used to justify the new coordinated contribution structure.

Given the material impact on RCMP Members' financial planning, retirement security, and historical contributions, the NPF must be included in the upcoming consultation process. We stand ready to participate constructively and ensure our Members receive accurate information and fair treatment in any legislative or regulatory changes that follow.

The issues raised in this letter are not hypothetical, they reflect real and pressing concerns about pension equity, medical privacy, career impacts, and Members' long-term financial security. We respectfully request that your office provide clear and detailed clarity with respect to Divisions 19 and 21 of Bill C-15, including their intended purpose, scope, and practical implications for RCMP Members. We further ask that you clearly articulate the Government's position on these amendments and outline how RCMP Member interests will be protected as these changes are implemented.

The National Police Federation stands ready to engage constructively and to provide any additional information or technical clarification that may assist in addressing these concerns. Should you wish to meet to discuss these matters in greater detail, please contact Jon Dale, Government Relations Advisor, at jdale@npf-fpn.com, to arrange a meeting at your earliest convenience.

Thank you for your continued attention to issues affecting RCMP Members and for your commitment to public safety.

Sincerely,



Brian Sauvé
President & CEO