

May 14, 2020

Matthew Boswell  
Commissioner of Competition  
Competition Bureau Canada  
Place du Portage I  
50 Victoria Street, Room C-114  
Gatineau, Quebec  
K1A 0C9

Dear Mr. Boswell,

Re: CNIB

My name is Mary Ellen Gabias and I am the President of the Canadian Federation of the Blind (CFB). The CFB is an advocacy group that fights for the human rights of blind Canadians. We are not an organization speaking on behalf of the blind; we are an organization of blind Canadians speaking for ourselves.

As outlined in the attached report, for the past 100 years a single non-profit company, the Canadian National Institute for the Blind (CNIB), has dominated and controlled the blindness business in Canada. In fact, by anyone's definition, the CNIB and its affiliates currently hold national monopolies when it comes to fund raising and providing services to the blind and the deafblind.

Not only does the CNIB have a national monopoly over critical services such as training and rehabilitation, it is also a self-appointed advocate for the blind and reportedly speaks on our behalf to government and media. We in the CFB are not aware of another instance where one organization has ever had the dual roles of being a monopolistic supplier and consumer advocate for the same group of citizens. I think it is important to point out that advocacy is the only area where the CFB competes with CNIB. We are not in the business of training and rehabilitation nor do we have any business ambitions.

Despite having a 100-year monopoly, the CNIB continues to expand its vertical integration and domination of blindness-related businesses. For example, in 2018 the CNIB entered into the guide dog business, with the goal of establishing a national program, while in 2019 the CNIB acquired Frontier Computing, a leading provider of accessible products and services.

As you know, monopolies focus on protecting their market share and generally make for an inefficient and unresponsive organization. I can assure you that the CNIB is no exception. The young and the working age blind suffer the most from the lack of training and lack of training options available in Canada. Many blind Canadians lack the basic skills necessary to find gainful employment, or to live independently, or to participate in community events and activities. The end result is that the vast majority of working age blind Canadians live in poverty on disability assistance. Most adult blind have given up hope of ever finding gainful employment and are not even included in the government's unemployment statistics.

Their lives do not need to be this way. Blind-skills training are much more advanced in other countries, such as the United States, where both government and non-profit companies operate training centres. Competition leads to innovation and improved services. It also gives visually impaired consumers the ability to choose a training program that best suits their specific needs.

I am writing to you with two hopes. The first is that you and your staff will keep open minds as you read the attached discussion paper. I say this, because after 100 years of corporate branding, many sighted Canadians have put the charity on a pedestal and tend to dismiss criticisms as simply a consequence of "they cannot please everyone." My second hope is that, as Canada's Competition Commissioner, you will investigate our complaints and will issue a public report encouraging Canadian governments to:

1. Take a more active role in providing training and rehabilitation services for the blind;
2. Promote competition and decrease governments' reliance on CNIB in supplying of goods and services to visually impaired Canadians; and
3. Prevent further business acquisitions or expansions by CNIB or its affiliated companies into the blindness business.

The report was completed last December but we delayed forwarding it because everyone's focus has been on Covid 19. We have opted to proceed, as it appears that the virus will be a long-term problem.

I will be happy to discuss the attached report or any of the related issues with you or your staff. I can be contacted at 250 598-7154 and by email at: [president@cfb.ca](mailto:president@cfb.ca)

Thank you for your time and consideration.

Yours truly,



Mary Ellen Gabias  
President  
Canadian Federation of the Blind

Attached