



Funeral Service Association of Canada | Association des services funéraires du Canada

**Written Submission for the Pre-Budget Consultations in
Advance of the 2026 Budget
By: Funeral Service Association of Canada**



Recommendation

Funeral Service Association of Canada calls on the Government to implement a coordinated three-part framework to ensure adequate and sustainable funding for death care services and recommends:

Tier 1: Universal Base – CPP Death Benefit Reform

Increase the CPP Death Benefit to \$5,000 and restore indexation to inflation.

Tier 2: Targeted Support – GIS Death Benefit

Introduce a \$5,000 death benefit for individuals receiving the Guaranteed Income Supplement (GIS).

Tier 3: Supplemental Support – Refundable Funeral Tax Credit

Introduce a means-tested \$2,500 refundable tax credit for funeral expenses, phased out for higher-income households that can be accessed early with proof of spending.

Purpose:

To recommend a coordinated set of federal policy measures that addresses the growing gap between the cost of end-of-life services and available financial supports, ensuring all Canadians have access to dignified care after death.

Beyond affordability, end-of-life services operate within a highly regulated, infrastructure-dependent system that must operate continuously across Canada. Financial gaps directly impact system capacity, accessibility, and the ability of deathcare providers to sustainably deliver services in all communities.

Background:

For decades, the Funeral Service Association of Canada (FSAC) and its provincial counterparts, have advocated for increased government support to ensure low-income Canadians can access essential end-of-life services. FSAC maintains that every Canadian—regardless of financial circumstances—deserves dignified, respectful care after death. This is not only a professional standard, but a fundamental societal responsibility.

Inflation and supply chain pressures have contributed to rising costs for funeral, burial, and cremation services, increasing the financial burden on Canadian families during a time of loss. These increases have far outpaced adjustments to provincial and federal death benefits, raising concerns about the adequacy of available supports.

End-of-life services rely on physical infrastructure, regulatory frameworks, and municipal planning systems. As costs rise and support fails to keep pace, strain is placed on both families and the broader system responsible for ensuring timely and dignified care.

Historically, gaps between available benefits and actual costs have been bridged by informal measures including discretionary fee reductions and subsidized services by funeral providers. This approach is no longer sustainable due to rising operating costs, regulatory requirements, and increasing complexity in service delivery. The affordability crisis being felt by many Canadians calls for a national solution rather than a patchwork of existing measures. Deathcare providers can no longer subsidize these programs, creating the risk of a two-tiered system where those relying on government support have fewer choices and may find no locally available provider of services for their families.

The Canada Pension Plan (CPP) Death Benefit has remained largely unchanged since 1998, with a maximum taxable benefit of \$2,500. Over the same period, the Consumer Price Index (CPI) increased by nearly 85%, significantly reducing the benefit's real value.

Although the federal budget of April 16, 2024, introduced a revised benefit of up to \$5,000, eligibility is narrowly restricted to contributors with no surviving beneficiaries who have not previously received CPP payments. As a result, the change is expected to affect relatively few Canadians and does little to address broader affordability pressures faced by families.

For many years, FSAC and its provincial partners have advocated for an increase to the Canada Pension Plan Death Benefit, and its indexation to ensure it remains meaningful and responsive to cost pressures.

Analysis

1. The Affordability Gap

End-of-life costs now significantly exceed available federal support:

- Burial services: approximately \$8,300–\$10,000
- Cremation services: approximately \$6,280
- Current CPP Death Benefit: \$2,500

This gap leaves many families, particularly those with limited savings—financially exposed and forced to make difficult trade-offs between essential expenses and the most basic deathcare costs.

2. Pressure on Service Providers and Public Systems

Deathcare providers have historically helped bridge affordability gaps through reductions. This informal subsidy model is no longer sustainable.

As federal support has not kept pace, costs have increasingly shifted to:

- Provincial or municipal social assistance programs
- Provincial Indigenous assistance programs
- Community-based assistance programs

Applications for these programs have increased, placing pressure on local governments and contributing to inconsistencies in access across jurisdictions. Without adequate support, unclaimed remains continue to rise, reflecting families' inability to afford burial or cremation services.

3. System Capacity and Access Considerations

The affordability gap is increasingly linked to broader system capacity challenges. End-of-life services require:

- Access to licensed service providers
- Availability of cemetery and cremation infrastructure
- Coordination across municipal and provincial regulatory frameworks

As financial pressures increase, providers are less able to absorb costs or maintain flexibility in service delivery. This results in reduced availability of services in certain regions, longer wait times, and increased reliance on public systems.

This has contributed to increased pressures on municipal and provincial systems, including a rise in unclaimed remains and delayed disposition.

A sustainable federal response must address both financial adequacy, and system stability.

4. Gaps in the Current Federal Framework

The current system presents several structural limitations:

- CPP Death Benefit: Contribution-based and not indexed to inflation
- Tax measures: Not designed to provide timely or targeted support
- Low-income seniors: Limited access to CPP-linked benefits

These gaps disproportionately affect low-income households, seniors, individuals with interrupted work histories, and women, particularly those with lower lifetime earnings and reduced pension contributions.

5. A Tiered Federal Response

FSAC recommends a coordinated, three-part framework:

Tier 1: Universal Base – CPP Death Benefit Reform

Increase the CPP Death Benefit to \$5,000 and restore indexation to inflation.

Tier 2: Targeted Support – GIS Death Benefit

Introduce a \$5,000 death benefit for individuals receiving the Guaranteed Income Supplement (GIS).

Tier 3: Supplemental Support – Refundable Funeral Tax Credit

Introduce a means-tested \$2,500 refundable tax credit for funeral expenses, phased out for higher-income households that can be accessed early with proof of spending.

6. Fiscal Considerations

Estimated annual costs:

- CPP enhancement: \$480M–\$520M
- Refundable tax credit: \$285M–\$315M
- GIS Death Benefit: ~\$400M

Total estimated cost: approximately \$1.2 billion annually

This represents a modest share of federal social spending and leverages existing delivery systems. The CPP component remains consistent with long-term actuarial sustainability and does not require increased contribution rates.

7. Equity and Gender Impacts

The current CPP system's reliance on lifetime earnings results in uneven outcomes. Women—particularly senior women—are more likely to experience gaps in eligibility due to lower lifetime earnings and caregiving responsibilities. An estate of a male is 10% more likely to be eligible for the CPP Death Benefit than that of an estate of a woman.

The proposed framework improves equity by:

- Reducing reliance on contribution history
- Improving support for low-income seniors
- Establishing a more consistent national standard of support

Final Recommendation

- A. Based on the analysis, it is recommended that the federal government adopt the proposed three-tier framework to strengthen affordability and equity in end-of-life supports. This framework includes increasing the Canada Pension Plan Death Benefit to \$5,000 and restoring indexation to inflation to maintain its relevance over time. It includes the introduction of a \$5,000 targeted death benefit for Guaranteed Income Supplement recipients to provide enhanced support to low-income seniors and their families. Finally, it proposes a \$2,500 refundable funeral expense tax credit, phased out for higher-income households to improve accessibility and reduce financial burden.

B. Tier-by-tier recommendations with implementation rationale

Tier 1: Universal Base – CPP Death Benefit Reform

Increase the Canada Pension Plan Death Benefit to \$5,000 and restore indexation to inflation.

Rationale: Strengthens the universality and adequacy of core federal support and ensure long-term alignment with cost-of-living increases.

Tier 2: Targeted Support – GIS Death Benefit

Introduce a \$5,000 death benefit for individuals receiving the Guaranteed Income Supplement (GIS), providing enhanced support for low-income seniors and their families.

Rationale: Directs additional assistance to those most likely to experience financial vulnerability at end of life.

Tier 3: Supplemental Support – Refundable Funeral Tax Credit

Introduce a \$2,500 refundable tax credit for eligible funeral expenses, phased out for higher-income households and designed to allow for early access with proof of spending.

Rationale: Provides flexible, income-sensitive support that helps reduce immediate out-of-pocket costs while complementing existing benefits.

Together, these measures would modernize federal support for end-of-life costs by improving adequacy, targeting assistance to vulnerable populations, and introducing a flexible mechanism to reduce immediate financial pressure on families. While each component addresses a distinct gap within the current system, collectively they provide a more coherent and equitable framework aligned with contemporary cost realities and the operational requirements of the systems that deliver end-of-life services across Canada. This approach would help ensure that all Canadians have access to dignified end-of-life arrangements without facing undue financial hardship during a period of bereavement.

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Enclosures:

APPENDICES “A” THROUGH “E”

Appendix A: Summary of Proposed Measures

Measure	Target Group	Benefit	Delivery Mechanism
CPP Death Benefit	Contributors	\$5,000 (indexed)	Service Canada
GIS Death Benefit	Low-income seniors	Up to \$5,000	Automatic (GIS-linked)
Refundable Funeral Tax Credit	Broad / income-tested	\$2,500	Canada Revenue Agency

Appendix B: Key Data Points

- CPP Death Benefit unchanged since 1998 (\$2,500 cap)
- Inflation increase since 1998: ~85%
- Average funeral costs:
 - Burial: \$8,300–\$10,000
 - Cremation: ~\$6,280
- Estimated annual deaths in Canada: ~326,000
- Estimated total proposal cost: ~\$1.2 billion annually

Appendix C: Policy Design Principles

The framework is guided by the following principles:

- **Adequacy:** Establish a meaningful minimum level of support
- **Equity:** Ensure access regardless of income or work history
- **Efficiency:** Leverage existing administrative systems
- **Sustainability:** Maintain fiscal responsibility and actuarial stability
- **Dignity:** Uphold a consistent national standard of end-of-life care

Appendix D: Concerns and Responses

Concern 1: The total cost is too high

Response:

At approximately \$1.2 billion annually, the proposed measures represent a modest investment relative to total federal social spending, which reduces downstream costs currently borne by provinces and municipalities through indigent burial programs.

Concern 2: This creates duplication across programs

Response:

The proposals are designed as a **tiered and complementary system**, not overlapping benefits. Each measure targets a distinct population:

- CPP: broad, contribution-based coverage
- GIS: low-income seniors
- RFTC: individuals outside or between these systems

Together, they ensure comprehensive coverage while minimizing gaps.

Concern 3: CPP enhancements may threaten long-term sustainability

Response:

Actuarial projections confirm that the CPP is in a stable position. The proposed enhancement represents a small fraction of total expenditures and does not require an increase in contribution rates. Indexation ensures long-term stability without repeated policy adjustments.

Concern 4: A tax credit does not provide timely support

Response:

The Refundable Funeral Tax Credit can be structured to allow advance payment mechanisms, ensuring funds are available at the time services are required.

Concern 5: End-of-life services fall under provincial jurisdiction

Response:

While service delivery is provincial, income support programs are clearly within federal jurisdiction. Strengthening federal benefits reduces pressure on provincial systems and supports a more consistent national standard, creating a baseline of dignified care.

Concern 6: Families should plan privately for end-of-life costs

Response:

Many Canadians—particularly low-income seniors—lack the financial capacity to pre-plan. The proposed measures establish a **baseline standard**, not full cost coverage, ensuring dignity without replacing personal responsibility.

Appendix E:

Works Cited

Office of the Chief Actuary. (2022). *31st Actuarial Report on the Canada Pension Plan as at 31 December 2021*. Office of the Superintendent of Financial Institutions (OSFI).

<https://www.osfi-bsif.gc.ca/en/oca/actuarial-reports/actuarial-report-31st-canada-pension-plan>

Department of Finance Canada. (2024). *Budget 2024: Fairness for Every Generation*.

Government of Canada. <https://www.canada.ca/en/department-finance/news/2024/04/fairness-for-every-generation.html>

Employment and Social Development Canada (ESDC). (2024). *Annual Report of the Canada Pension Plan for the Fiscal Year Ending March 31, 2024*.

<https://www.canada.ca/en/employment-social-development/programs/pensions/reports/annual-2024.html>

Health Canada. (2024). *Canada Dental Care Plan (CDCP) Eligibility and Thresholds*. Government of Canada. <https://www.canada.ca/en/health-canada/services/health-care-system/canada-dental-care-plan.html>

Statistics Canada. (2025). *Consumer Price Index (CPI) Portal: Historical Data 1998–2025*. Table 18-10-0004-01. <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1810000401>

Canada.ca. (2026). *Canada Pension Plan Death Benefit: Eligibility and Payment Amounts*. <https://www.canada.ca/en/services/benefits/publicpensions/cpp/cpp-death-benefit.html>

House of Commons Standing Committee on Finance (FINA). (2026). *Pre-Budget Consultations in Advance of the 2026 Budget*. <https://www.ourcommons.ca/committees/en/FINA/StudyActivity?studyActivityId=13385942>

National Institute on Ageing (NIA). (2025). *Pre-Budget Consultations: Modernizing the CPP and GIS*. <https://www.niageing.ca/>

Funeral Service Association of Canada (FSAC). (2026). *Organizational History and Advocacy Report*. <https://fsac.ca/advocacy/2026-pre-budget-brief>

National Funeral Directors Association (NFDA). (2025). *Cremation and Burial Report: Canada Edition*. <https://nfda.org/news/statistics>