

Memorandum

TO	Board of Directors
FROM	CEO Juda Strawczynski and CFO Sean Walker
DATE	May 28, 2026
SUBJECT	2027-2028 Licence Fees

Motion

Be it resolved that the Board approves fees in accordance with the Schedule 1 attached at Appendix A to come into effect January 1, 2027, conditional on CPATA's By-Laws, which are drafted in conjunction with the Department of Justice, being amended in time for such changes to come into effect.

Background and New Fee Recommendation

This memo provides the recommended fee amounts for 2027-2028 for the Board's approval.

As an independent regulator, CPATA's funding comes exclusively from fees, 90% of which are licence fees. The College sets licence fees at amounts sufficient to have the necessary resources to meet its extensive mandate.

CPATA sets fees in Schedule 1 of its By-laws. CPATA's By-laws are regulations for the purposes of Canada's Statutory Instruments Act, and are drafted with the Department of Justice and published in the Canada Gazette.

CPATA last adjusted licence fees in 2023, with the goal of scaling-up the College's work and building financial reserves to support the long-term sustainability of the College. As reserve targets were reviewed in 2025 and are expected to be met by the end of 2026, CPATA has been taking steps to adjust licence fees for 2027.

To determine the required fees we have taken several steps including modeling high-level projections for revenues and expenses for the next few years to develop preliminary license fee ranges, and holding a [Call for Comments](#) in January-February 2026 on the proposed licence fee ranges for 2027-2028.

Since the close of its Call for Comments, CPATA's staff, Audit and Risk Committee and Board have reviewed all comments received in response to the Call for Comments, considered financial trends for 2026, and analyzed licence renewal data for 2026. With these inputs we are now able to provide a fee recommendation for 2027 and 2028 and are pleased to recommend a slight further reduction from the initial range presented in the Call for Comments.

CPATA staff and the Audit & Risk Committee recommend a C1 fee reduction from \$1,877 in 2026 to \$1,400 for 2027 (a nearly 25% reduction) with fees indexed to inflation thereafter. Dual license and C2 licensee

fees would be reduced by similar proportions. See **Appendix A** for the proposed revised schedule of CPATA fees.

Inputs, Analysis and Recommendations

i. Call for Comments Input

CPATA held a Call for Comments with respect to its 2027–2028 proposed license fees from January 15 to February 27, 2026. CPATA received feedback from 32 individual licensees (19 with attribution and 13 anonymous) and a submission from IPIC. Of the 19 submissions with attribution:

- Most came from solo and small firm/agency licensees.
- Most submissions are from Ontario-based licensees.
- One submission was made in French and the rest in English.
- Eight submissions took the form of a tailored letter from solo or small agency/firm practitioners.

CPATA appreciates the feedback that was shared by individuals and IPIC and carefully considered it. The feedback on fee amounts can be summarized as follows:

- Nearly all submissions indicated that fees should be reduced, with only one submission cautioning that while fee reductions “sound nice” CPATA should remain wary of longer-term issues such as demographic shifts that might reduce the number of licensees over time.
- CPATA heard a range of views on appropriate ranges or approaches to fees.
 - Suggestions from individuals included, for example: a return to CIPO-level fees around \$400; a step-down approach with an initial reduction to \$1,000, with the goal of reducing to \$500; and several solo and small agency/firm licensees recommending Class 1 fees of \$1,200.
 - IPIC agreed that there should be a reduction in fees, and on its detailed review of CPATA’s financial reports, expressed concerns that CPATA’s expenses were overestimated and that further reductions would be warranted. It recommended a fee reduction of 30% across all license fees for 2027, to then be indexed up 2% for 2028.
- Some suggested that CPATA consider different fees based on different factors, such as:
 - area of practice (ex: trademark vs. patent)
 - practice setting such as firm size (solo and small vs. larger firm) or in-house practice
 - demographic served (ex: serving Canadian innovators; rural communities)
 - full vs. part-time practice (as is available for lawyers in BC), or
 - dual regulated licensees who are both lawyers and CPATA licensees.

ii. 2026 Licensing Input

Since as noted above 90% of CPATA's revenues are license fees (with other fees such as exam fees accounting for other revenues), CPATA bases its revenue and budget primarily on the number of licensees in the professions, and sets license fees based on these figures. Licence fees must consider licensee trendlines. We saw expected decreases in the number of licensees when regulation was introduced in 2021. More recently there has been a decline of approximately 2-4% in the number of Class 1 Trademark agents per year. However, the 2026 renewal period closed in March 2026, and we are seeing the number of licensees leveling out, with numbers of agents in training increasing as well. CPATA is therefore now able to forecast for smaller adjustments for the number of licensees for the next few years.

iii. 2026 Financial Input

Since launching its Call for Comments CPATA has closed its 2025 fiscal year and is well into the 2026 fiscal year. CPATA's finances are strong. CPATA budgeted for a financial reserve surplus of \$200,000 in 2026. This year, operations are running smoothly, with no major expense fluctuations expected, and no matters projected to require a withdrawal from the financial reserves.

iv. Analysis

The original range of fees proposed in the Call for Comments indicated Class 1 licence fees of \$1,450-\$1,550. This range was subject to input from the Call for Comments and from further financial review. Based on the above, both licence number trendlines and CPATA's budget and financial projections are positive. CPATA has a \$200,000 surplus from 2025 that it can apply to further reduce fees. With licensee trendline stabilizing, a surplus from budget 2025, and CPATA's shift to a zero-based budgeting method seeking to match income with operational expenses as closely as possible (without the need to also build reserves) CPATA staff, the Audit & Risk Committee and Board are all of the view that a further fee reduction is possible at this time. This can be done while continuing to meet CPATA's mandate.

Based on the feedback from the Call for Comments, Staff, the Audit & Risk Committee and the Board considered the possibilities of different fees based on different practice settings. This was last considered when fees were set in 2023 by change to the By-laws.

Ultimately no practice-setting changes are recommended. The number of licensees is small, and any change to reduce the fees for one part of the professions would necessitate an increase to others. Certain changes would also increase operational costs. Specifically:

- **Trademark agent vs. patent agent practices:** CPATA treats these licences the same for operational cost. A decrease to one practice area would necessitate an increase to the other that would not be equitable or in the public interest.

- **Practice setting: Firm Size:** It has been suggested that licensing fees could be reduced for solo or small agency/firm licensees given that fees are reported to be a burden on small practitioner practice. CPATA recognizes that fees impact licensees and firms that pay fees on behalf of licensees differently depending on the specifics of their situations. However, CPATA does not base licensing fees on firm size, and while in some cases those in solo/small practice earn less than other licensees, this is not always the case. CPATA cannot use firm size as a proxy for individual licensee income to develop different income-based fees. Moving to an income-based model would have significant impact. It is unlikely that licensees would support a fee model that would require disclosing income or revenue to CPATA. Such a program would also add significant administration costs.
- **Practice setting: In-house agents:** CPATA heard that some agents practice in-house and do not have licensing fees paid by their employers and it was suggested that CPATA consider a discounted rate for agents in this practice setting. While some in house agents do not have their fees paid by their employer, CPATA has observed that in many cases employers do cover this cost. A fee reduction for this category would also not be equitable to other categories of licensees, such as solo practitioners who also pay their own fees.
- **Demographic served:** CPATA recognizes that some licensees serve Canadian innovators who may not be able to afford high fees, or who serve in underserved areas. While CPATA applauds all efforts to facilitate access to services, for similar reasons as those noted above, CPATA is not in a position to charge fees based on area of practice or income.
- **Full time vs. part-time practice:** For those who are taking a leave of absence, the inactive Class 4 licence category is available and provides a significant fee reduction for when the licensee is not working. However, developing different fees for full-time versus part-time practice would be another area that would be difficult to administer in practice.
- **Discounts for dual regulated licensees:** CPATA recognizes that many of its licensees are also regulated as licensees of another profession or professions. However, CPATA has not observed that the costs associated with regulating licensees who are also part of another profession are lower. CPATA is unaware of other professional regulators providing a discount to licensees who are members of another profession and doing so would lead to increased fees to other licensees who are not also members of other professions. A CPATA licensee is a CPATA licensee whether part of another profession or not and the current approach to fees reflects this.

CPATA will maintain its current approach to licensing categories, with Class 1, Class 2, Class 3 and Class 4 and dual-licence options, and fees set for each category.

vi. Recommendations

Schedule 1 attached at Appendix A outlines the recommended licence and other fee amounts for 2027, to be amended in conjunction with the Department of Justice and to come into effect January 1, 2027.

Based on CPATA's most recent licensing renewal numbers and recent financial results, a further reduction to **\$1,400** for Class 1 licensees is appropriate for 2027. This provides a fee reduction while maintaining the income needed to address the costs of delivering on CPATA's significant regulatory mandate.

Class 2 and dual licences will also be reduced proportionally based on the Class 1 reductions.

All other fees (Class 3 and Class 4 licensing fees and all other non-licensing fees) will continue to be indexed to inflation. Certain fees currently in Schedule 1 related to remarking of exams and applications to surrender a license will be removed from Schedule 1 as they no longer apply.

These fee recommendations account for CPATA's current operational needs. It assumes that any major unforeseen operational issues and/or changes to the volume or complexity of unauthorized practice, complaints, investigation and discipline or litigation would be addressed through use of reserve funds.

The fee recommendations are for the 2027-2028 period. Fees for 2028 would continue to be increased by the Canada September consumer price index (CPI). Given CPATA's multiyear budget efforts and available reserves, CPATA does not expect other fee changes during this period.