

Submission to the Standing Committee on Canadian Heritage

June 14, 2024

Protection of Canadian Children, Women, and Men from Illegal Sexually Explicit Material

Introduction

[The Evangelical Fellowship of Canada](#) is the national association of evangelical Christian denominations, churches, post-secondary institutions and organizations in Canada. Established in 1964, the association provides a forum for collaboration and engagement among the roughly 1.7 million Evangelicals who are part of its constituency.

We commend the committee for studying this difficult yet important topic. The subject matter and evidence are disturbing, but understanding and action are essential to protect Canadians from the range of harms associated with illegal content online.

Illegal sexually explicit material online can have significant and harmful impacts on Canadian victims and viewers. It has devastating, lifelong consequences for those whose images are uploaded and distributed. It affects the sexual health, behaviours and attitudes of viewers. And the viewing of this content normalizes and contributes to sexual violence and exploitation in Canadian culture.

We are grateful for the opportunity to participate in the committee's study. Our approach to the issue of illegal sexually explicit material is based on biblical principles of respect for the dignity of all persons, a desire for justice, and care for those who are vulnerable. These principles are also reflected in Canadian law and public policy.

What Illegal Sexually Explicit Material is Available Online?

Illegal sexually explicit material that is viewed online is commonly referred to as image-based sexual abuse (IBSA), an umbrella term that includes child sexual abuse material, non-consensual distribution of intimate images, sextortion and deepfake or AI pornography. Women and girls face a greater risk of victimization from IBSA, but, "No age, gender, or socioeconomic status is free from the threat of IBSA. It can happen to anyone."¹ This is evident in the increasing number of teenage boys in Canada falling prey to sextortion schemes, with devastating consequences.²

Child Sexual Abuse Material (CSAM)

CSAM by the Numbers:

- Over 13.4 million suspected images of child sexual abuse had been triggered for review by the Canadian Centre for Child Protection's web crawler by 2019.³

¹ <https://endsexualexploitation.org/articles/image-based-sexual-abuse-a-little-known-term-but-a-pervasive-problem/>

² <https://www.rcmp-grc.gc.ca/en/news/2024/rcmp-warns-public-sextortion-scams-targeting-young-males>

³ https://content.c3p.ca/pdfs/C3P_ChildRightsFramework_Summary_en.pdf

- According to Statistics Canada, 15,630 incidents of online sexual offences against children and 45,816 incidents of online child pornography were reported by police from 2014 to 2022.⁴
- "Studies show that prepubescent children are at the greatest risk of being depicted in CSAM and 84.2% of these videos and images contain severe abuse."⁵
- Approximately one million reports of child sexual exploitation are received by the National [U.S.] Center for Missing and Exploited Children (NCMEC) CyberTipline each month. The hotline has received, in total, more than 45 million reports."⁶

Section 163.1(1)(a) of the *Criminal Code* prohibits making, possessing, distributing and accessing child pornography. Child pornography is defined as a "visual representation ... that shows a person who is or is depicted as being under the age of eighteen years and is engaged in or is depicted as engaged in explicit sexual activity."⁷

Throughout this submission, we use the term child sexual abuse material to refer to images or content that depicts a person under the age of 18 years, rather than the term child pornography. Sexually explicit images and videos depicting children cannot be considered "pornography" – they are child sexual exploitation, assault and abuse. The term "child pornography" risks normalizing, trivializing and legitimizing the sexual abuse and exploitation of children. As professors from the University of Toronto explain in their submission to the United Nations, "An explicit photo or video of a child is evidence they have been a victim of sexual abuse."⁸ The term "pornography" in the context of children may infer that the child is a willing participant when in fact they are the victim of crime. Children cannot legally consent to sex or to images of their abuse being recorded. As such, we support Bill C-291, passed by the House in February 2023, and are hopeful the Senate will give timely consideration to passing the bill.

CSAM is an escalating problem within Canadian society. John Clark, CEO of NCMEC, stated in recent testimony that, "The number of reports of child sexual exploitation received by [NCMEC] is heartbreaking and daunting. So, too, are the many new trends NCMEC has seen in recent years. These trends include the following: a tremendous increase in sexual abuse videos reported to NCMEC, reports of increasingly graphic and violent sexual abuse images, and videos of infants and young children. These include on-demand sexual abuse in a pay-per-view format, and videos showing the rape of young children."⁹ Lianna McDonald, Executive Director of the Canadian Centre for Child Protection, described a "tsunami" of victims coming to organizations like theirs for help to get their images removed from the internet and taken down from websites.¹⁰

⁴ <https://www150.statcan.gc.ca/n1/daily-quotidien/240312/dq240312b-eng.htm>

⁵ <https://www.ohchr.org/sites/default/files/documents/issues/children/sr/cfis/existing-emerging/subm-existing-emerging-sexually-aca-university-toronto-dr-sara-grimes-cewen.pdf>

⁶ <https://protectchildren.ca/en/resources-research/child-rights-framework/>

⁷ <https://laws-lois.justice.gc.ca/eng/acts/c-46/section-163.1.html>

⁸ <https://www.ohchr.org/sites/default/files/documents/issues/children/sr/cfis/existing-emerging/subm-existing-emerging-sexually-aca-university-toronto-dr-sara-grimes-cewen.pdf>

⁹ <https://www.ourcommons.ca/documentviewer/en/43-2/ETHI/meeting-21/evidence>

¹⁰ <https://www.ourcommons.ca/documentviewer/en/43-2/ETHI/meeting-21/evidence>

Since 2015, Canada has been the fourth largest buyer of online sexual exploitation of children from the Philippines.¹¹ Canadian offenders are purchasing live-streamed CSAM from other nations, and in doing so are participating in and fueling online sex trafficking, contrary to Canadian and international law.

Non-Consensual Distribution of Intimate Images (NCDII)

NCDII by the Numbers:

- Police-reported Canadian data indicate 896 cases of NCDII reported in 2022.¹²
- In police-reported incidents of NCDII, "Youth aged 12 to 17 years accounted for almost all (97%) victims with the large majority (86%) of victims being girls."¹³
- "According to one study, more than 96% of AI generated pornography was produced without the consent of those featured in it."¹⁴
- In a study that surveyed over 850 women involved in the commercial sex trade in nine different countries, "49% stated that porn had been made without their consent while working and 47% had been physically harmed by men who had forced them to act out things they had seen and learned from porn."¹⁵

NCDII may include:

- images which are recorded without consent, including sexual assault or rape (no consent to sexual activity, e.g. drugged or sleeping individuals), and then distributed; or
- images which were recorded with consent, but where no consent was given to their sharing or distribution.¹⁶

As stated above, there were 896 cases of NCDII reported to the police in 2022. However, these numbers only reflect the images that have been discovered and reported to the police. How many Canadian children, women and men do not yet know their images have been posted without their knowledge or consent, or who to approach for help if they do? Additionally, how many Canadian victims of AI-generated porn exist?

As Canada's Privacy Commissioner notes in his report *Investigation into Aylo (formerly MindGeek)'s Compliance with PIPEDA*, Canadian adults who are the victims of NCDII face a variety of risks: "Individuals who have had their intimate content disclosed without their consent have experienced severe consequences including reputational, financial and emotional harm.

¹¹ <https://www.ijm.ca/news/strengthening-prevention-response-canadian-online-sexual-abuse-filipino-children>

¹² <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3510000101>

¹³ <https://www150.statcan.gc.ca/n1/daily-quotidien/240312/dq240312b-eng.htm>

¹⁴ <http://undocs.org/en/A/HRC/56/48>

¹⁵ <https://www.independent.co.uk/voices/pornhub-trafficking-exploitation-change-petition-sex-work-decriminalisation-a9369616.html>

¹⁶ While this is often called "revenge porn," we do not use or recommend this wording because it can imply justification for the criminal offence.

These harms can come in the form of targeted harassment that occurs online or in person, loss of job opportunities and mental health impacts up to and including suicide.¹⁷

One study found that young women who have experienced NCDII “revealed declines in overall mental health, anxiety, depression, post-traumatic stress, suicidal thoughts, increased alcohol and drug consumption, and low self-esteem and confidence.”¹⁸ Victims of NCDII also face ongoing trauma and an ongoing violation of their privacy as they live with the permanence of their intimate images on the internet.

Deepfake or AI Pornography

AI Pornography by the Numbers:

- Between “96% and 98% of deepfake videos available online feature sexual content”¹⁹
- Using AI to create deepfake nudes, “One boy with his phone in the course of an afternoon can victimize 40 girls, minor girls.”²⁰

As technology evolves, there is ever-increasing access to tools, such as AI, that “expose children to increased risks through the consumption, creation, or sharing of abusive materials, often leading to grooming and sexual exploitation.”²¹ These risks include harm to mental health, reputation, safety, and can pose a threat to school and career prospects.²² The use of non-consensual, AI created images, like all CSAM and NCDII, harasses, harms, and humiliates victims. Generative AI and deepfake pornography are an emerging threat and we need urgent action to develop legislation that protects victims of all ages.

Violent Images

We note that while not necessarily illegal, much of the content readily available on pornography platforms features violent, degrading and abusive behaviour. There is content that depicts illegal activity, for example, rape-themed or incest-themed pornography. The public health impact of this content on Canadians should be studied.

A study published in 2020 in the *Archives of Sexual Behaviour* found that 45% of randomly selected videos on Pornhub depicted at least one act of physical aggression. The most common types of physical aggression were spanking, gagging, slapping, hair pulling and choking. Women were virtually always (97%) the target of aggression.²³ A peer-reviewed study of the top-watched, top-selling scenes in pornography found that 90% of them had some form of emotional, physical or sexual violence against women.²⁴

¹⁷ <https://www.priv.gc.ca/en/opc-actions-and-decisions/investigations/investigations-into-businesses/2024/pipeda-2024-001/>

¹⁸ <https://journals.sagepub.com/doi/10.1177/08862605221122834?icid=int.sj-abstract.similar-articles.3>

¹⁹ <https://www.ohchr.org/sites/default/files/documents/issues/children/sr/cfis/existing-emerging/subm-existing-emerging-sexually-aca-university-toronto-dr-sara-grimes-cewen.pdf>

²⁰ <https://www.nytimes.com/2024/04/22/technology/deepfake-ai-nudes-high-school-laws.html>

²¹ <https://www.ohchr.org/sites/default/files/documents/issues/children/sr/cfis/existing-emerging/subm-existing-emerging-sexually-aca-university-toronto-dr-sara-grimes-cewen.pdf>

²² <https://www.nytimes.com/2024/04/08/technology/deepfake-ai-nudes-westfield-high-school.html>

²³ <https://link.springer.com/article/10.1007/s10508-020-01773-0>

²⁴ <https://pubmed.ncbi.nlm.nih.gov/20980228/>

Aggressive, violent and dehumanizing sexual activity is now considered mainstream in pornography.²⁵ The landing pages of mainstream pornography sites suggest sexually violent content to first-time viewers. The April 2021 *British Journal of Criminology* study found that 1 in 8 of the titles shown to first-time viewers on mainstream pornography sites were described as portraying sexually violent acts.²⁶ Much of what is now online is steeped in misogyny and centred around the domination and humiliation of women. It is violent, degrading and profoundly body-punishing for the female participants.

Disturbingly, the study's authors note that "teen" was the most frequently occurring word in all the titles, including the titles referring to sexual violence. The most common form of sexual violence depicted was sexual activity between family members, such as parent-child or siblings. The second most common form of sexual violence was physical aggression and sexual assault, which included titles with terms like "force," "punch," "molest" and "brutal."²⁷

In their conclusion, the authors state that pornography platforms are distorting the boundary between what constitutes sexual violence and what does not: "We found that depictions of practices that meet criminal standards of sexual violence, including rape, incest and so-called 'revenge porn', are labelled in ways that not only minimize or remove their criminality but often mock or belittle the possibility of harm."²⁸ This is a troubling idea – that as sexually violent pornography is minimized, normalized and increasingly consumed by Canadians, this will have impacts and contribute to harms faced offline.

Harms Caused and Risks to the Public from Illegal Sexually Explicit Material Online

As the committee has heard from witnesses and has been recounted in this brief already, the impact of ease of access to illegal sexually explicit material online is widespread. There are harms to victims, to Canadian viewers, and contributions to violence and sex trafficking.

Harms to Victims

Children and youth face devastating, lifelong consequences when videos and images of their abuse and exploitation are streamed and distributed. The spread of their intimate images is beyond their control, and once these images are online it is nearly impossible to have them permanently removed. Survivors of recorded child abuse indicated that the imagery impacted them in a different way than the initial abuse: "The information shared by the respondents to this survey makes it clear that the recording of abuse and its distribution adds an extraordinary layer of trauma for a victim."²⁹ Survivors describe feeling powerless to stop the distribution of the images. The harm and trauma are ongoing.

²⁵ Dines, Gail Dr./Culture Reframed, 2015, *Pornography: A Public Health Crisis – US Capitol Hill Symposium*, <https://www.youtube.com/watch?v=7A62CdYyNSE>

²⁶ <https://academic.oup.com/bjc/advance-article/doi/10.1093/bjc/azab035/6208896>

²⁷ <https://academic.oup.com/bjc/advance-article/doi/10.1093/bjc/azab035/6208896>

²⁸ <https://academic.oup.com/bjc/advance-article/doi/10.1093/bjc/azab035/6208896>

²⁹ https://protectchildren.ca/pdfs/C3P_SurvivorsSurveyFullReport2017.pdf

Sextortion, in which the threat of sharing CSAM or distributing intimate images is used to demand more images or payment, is on the rise. "If the victim is a girl, the predator often demands more sexual photos or videos. If a boy, money is almost always the ransom."³⁰ According to the RCMP, sextortion occurs "when someone online threatens to send a sexual image or video of you to other people if you don't pay them or provide more sexual content."³¹ In Canada, law enforcement have been warning about the rise in sextortion, calling it an "epidemic."³² In September 2023, Cybertip.ca said they received an average of 40 sextortion reports a week. By November, this number had risen to 50 sextortion reports a week.³³

There have been tragic cases in Canada of children as young as 12 years old committing suicide after falling victim to sextortion.³⁴ In May 2024, the RCMP warned Canadians that sextortion has a profound impact on victims, often causing them to "feel alone, ashamed, scared, and sometimes desperate – to the point where they can harm themselves."³⁵

Contributions to Violence and Aggression

Research commissioned by the British Board of Film Classification found that children and teens are watching and coming across pornography at young ages.³⁶ It found more than half of 11–13 year-olds (51%) and two-thirds of 14–15 year-olds (66%) had viewed pornography online. Some children were as young as 7 or 8 years of age at their first exposure. For more than 60% of youth aged 11–13 years of age, their first viewing of pornography was accidental. Youth are easily able to access free pornography sites like Pornhub that do not have any meaningful age verification in place.

A recent meta-analysis of international studies concluded that pornography consumption is associated with an increased likelihood of committing acts of verbal or physical sexual aggression, regardless of age.³⁷ In a recent report on family violence, Canada's Chief Public Health Officer points out, "The belief that violence is acceptable and a normal way to behave can increase the risk for child abuse and intimate partner violence. Exposure to violence can lead to it being seen as normal."³⁸

A growing body of evidence indicates that regular use of pornography, even pornography that does not include sexual violence, changes users' beliefs about rape and sexual violence.³⁹ Pornography use is associated with a range of individual health impacts including impaired sexual function, addiction, severe social anxiety and depression. Pornography shapes what both

³⁰ <https://nationalpost.com/news/canada/sextortion-online-sexual-luring-meta-snapchat>

³¹ <https://www.rcmp-grc.gc.ca/en/news/2024/rcmp-warns-public-sextortion-scams-targeting-young-males>

³² <https://globalnews.ca/news/10118239/canada-sextortion-online-rise-prince-george/>

³³ <https://globalnews.ca/news/10118239/canada-sextortion-online-rise-prince-george/>

³⁴ <https://vancouver.citynews.ca/2023/11/29/canada-tip-line-sextortion/>

³⁵ <https://www.rcmp-grc.gc.ca/en/news/2024/rcmp-warns-public-sextortion-scams-targeting-young-males>

³⁶ <https://www.bbfc.co.uk/about-us/news/children-see-pornography-as-young-as-seven-new-report-finds>

³⁷ <https://psycnet.apa.org/record/2015-58817-001>

³⁸ <https://www.canada.ca/content/dam/canada/public-health/migration/publications/department-ministere/state-public-health-family-violence-2016-etat-sante-publique-violence-familiale/alt/pdf-eng.pdf>

³⁹ Layden, Mary Anne (2014), *CESE Summit: Long Term Consequences of Pornography Use: Overview of the Research*, <https://vimeo.com/111104070>

boys and girls expect and accept in terms of sexual violence in relationships. It negatively impacts their ability to develop and maintain healthy relationships. According to a study out of the United States, "Sexual aggression is now widely recognized as a public health crisis."⁴⁰

Habitual pornography users may become desensitized to the content they've been viewing, and move on to more shocking or violent material including material that features teens and children. Significantly, there is evidence that viewers of illegal content online are more likely to offend offline. Research conducted by Childlight found that "Men in Australia, UK and USA who report online sexual offending behaviours against children also report being 2–3 times more likely to seek sexual contact with children between the ages of 10–12 years old if they were certain no one would find out."⁴¹ The Australian Institute of Criminology found that some offenders consuming CSAM live-streamed online traveled or attempted to travel to abuse the victims in person.⁴² The consumption of CSAM online, including live-streamed abuse, puts children in Canada and around the world at risk.

As children and youth consume and absorb violent content online, they may begin to mimic the behaviour they see online. This has caused an increase in child-on-child abuse.⁴³ One study found that frequent pornography consumption leads to more exposure to pornographic depictions of sexual choking, which in turn predicts a higher likelihood of choking sexual partners through the belief that sexual choking is pleasurable, the belief that sexual choking is safe, and the disbelief that sexual choking requires consent from the person being choked."⁴⁴

The viewing of violent sexually explicit content contributes to a sexually toxic environment: "Sexual aggression was operationalized as pressuring another person into having sex despite their explicit declaration of nonconsent. Having been exposed to pornography and perceiving pornography as realistic were associated with increased sexual aggression risk."⁴⁵

Particularly, there is harm to the health of women and girls. For example, a study of aggression in mainstream pornography found that women were the target of aggression in 97% of the scenes and their response to the aggression was neutral or positive, rarely negative.⁴⁶ The harms and impact on Canadians of violent and dehumanizing sexual content online should be studied by Parliamentarians and government agencies.

⁴⁰ <https://pubmed.ncbi.nlm.nih.gov/33625313/>

⁴¹ <https://childlight.org/nature-online-offending-against-children-population-based-data-australia-uk-and-usa>

⁴² https://www.aic.gov.au/sites/default/files/2023-05/ti671_overlap_between_csa_live_streaming_contact_abuse_and_other_child_exploitation.pdf

⁴³ <https://www.bbc.com/news/uk-41504571>

⁴⁴ <https://pubmed.ncbi.nlm.nih.gov/34696638/>

⁴⁵ <https://pubmed.ncbi.nlm.nih.gov/33625313/>

⁴⁶ https://www.researchgate.net/publication/342907785_A_Descriptive_Analysis_of_the_Types_Targets_and_Relative_Frequency_of_Aggression_in_Mainstream_Pornography

Ease of access and circulation

Violent, degrading, dehumanizing and illegal sexually explicit content online has never been so readily accessible, including to children and youth. Canadian children are harmed by the ease with which they can access graphic and violent pornographic content.⁴⁷

Equally, they are harmed by its ease of distribution. As University of Toronto professors state, "The nature of digital content already allows for easy replication and widespread dissemination, making containment challenging. Furthermore, the anonymizing capabilities of technologies like encryption complicate offender identification."⁴⁸

As the committee considers how to address these harms, it is imperative that the onus not be on victims to monitor commercial pornography sites to ensure that depictions of their abuse and exploitation are not posted or, if discovered, to ensure they are swiftly removed. Companies must be responsible for ensuring that the content they host and profit from is not child sexual abuse material, that the people depicted in uploaded content are not minors, and that they consent to their image being posted. Platforms must have mechanisms in place to ensure illegal content is never uploaded in the first place. Furthermore, for the prevention of harm, Canada's legal frameworks must require verification of the age and consent of all individuals depicted in sexually explicit content, and verification of the content viewers. This framework must also include generated content.

The gaps and harms that we've identified do not seem to be addressed in the current version of Bill C-63, the proposed Online Harms Act.

Contribution to sex trafficking

According to the *Report of the UN Special Rapporteur on violence against women and girls, its causes and consequences*, "Some 75 per cent of sex trafficking victims are now advertised online."⁴⁹ There is a trend toward increased sexual exploitation online. As more sexual act buyers turn to online sources, there is a growing monetary incentive for the online exploitation of Canadian and international victims.

Illegal sexually explicit images online may be the recorded exploitation of trafficking victims. As noted above, the livestream sexual exploitation of children is consumed by Canadians. These children are victims of trafficking. Women and children are both trafficked for use in pornography, and trafficking victims can have images of their abuse and exploitation recorded and distributed. As well, pornography may be used to groom trafficking victims and show them what is expected of them. The "breaking in" process often involves recording the initial abuse, which is then used to threaten and control the victim.

⁴⁷ <https://parlvu.parl.gc.ca/Harmony/en/PowerBrowser/PowerBrowserV2/20210222/-1/34824>

⁴⁸ <https://www.ohchr.org/sites/default/files/documents/issues/children/sr/cfis/existing-emerging/subm-existing-emerging-sexually-aca-university-toronto-dr-sara-grimes-cewen.pdf>

⁴⁹ <http://undocs.org/en/A/HRC/56/48>

The pornography industry benefits from the distribution of illegal sexually explicit materials, including those made of sex trafficking victims: “In December 2023, after a federal investigation in the United States, Aylo Holdings (formerly MindGeek) admitted that it had profited from sex trafficking, and agreed to pay a fine of \$1.8 million in order to avoid criminal prosecution for profiting from sex trafficking videos on its site.”⁵⁰ The trafficked victims involved in this case stated that they were coerced and did not give consent.

Catharine MacKinnon, the American feminist legal scholar, argues that pornography is a type of sex-trafficking: “Pornography is one way women and children are trafficked for sex. To make visual pornography, the bulk of the industry’s products, real women and children, and some men, are rented out for use in commercial sex acts.”⁵¹

Recommendations

- 1. We recommend the committee support the passage of Bill C-270, *Stopping Internet Sexual Exploitation Act*.** This bill would require pornography platforms to verify the age and consent of individuals featured in content before it is uploaded. This fits within the Minister of Heritage’s mandate to combat serious forms of harmful online content to protect Canadians and hold social media platforms and other online services accountable for the content they host.⁵²
- 2. We recommend pornography platforms be required to put meaningful, privacy-compliant age verification in place to keep minors from accessing their content.**
- 3. We recommend that legal definitions of CSAM, currently referred to as child pornography in the *Criminal Code*, and NCDII be expanded to include AI-generated material.**
- 4. We recommend data collection and further study of the extent and impacts of NCDII.** According to the Department of Justice Canada, “There is limited data on the extent and the nature of this [NCDII] activity. Much of what is known about this behaviour is anecdotal and comes from the United States.”⁵³
- 5. We recommend the committee consider the Privacy Commissioner’s recommendations to Aylo (formerly MindGeek) as a template of what should be required of all pornography platforms.** The Privacy Commissioner recommended that “the company: (i) cease allowing the upload of intimate content without first obtaining meaningful consent directly from each individual appearing in that content; (ii) delete all content that it previously collected without obtaining such consent; and (iii) implement a

⁵⁰ <http://undocs.org/en/A/HRC/56/48>

⁵¹ <https://repository.law.umich.edu/mjil/vol26/iss4/1/>

⁵² <https://www.pm.gc.ca/en/mandate-letters/2021/12/16/minister-canadian-heritage-mandate-letter>

⁵³ <https://www.justice.gc.ca/eng/rp-pr/other-autre/cndii-cdnclii/p6.html>

privacy management program to ensure that it is accountable for information under its control.”⁵⁴

- 6. We concur with the Privacy Commissioner’s recommendation that Aylo be subject to oversight by an independent third-party for a period of five years.** ⁵⁵

Respectfully submitted,
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⁵⁴ <https://www.priv.gc.ca/en/opc-actions-and-decisions/investigations/investigations-into-businesses/2024/pipeda-2024-001/>

⁵⁵ <https://www.priv.gc.ca/en/opc-actions-and-decisions/investigations/investigations-into-businesses/2024/pipeda-2024-001/>