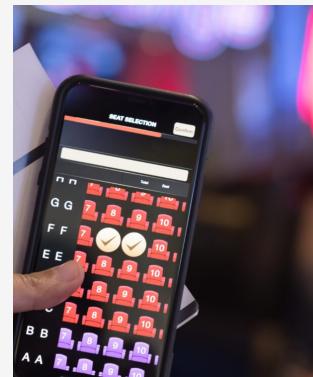


Québec's Bill 10: new rules for subscriptions and ticket resale practices – what businesses need to know

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Key Takeaways

- Bill 10 requires merchants to provide clear cancellation options, end-of-trial notices and transparent fee disclosures for subscriptions.
- The bill prohibits transfer fees on resale tickets, mandates clear disclosures about resale platforms and sets limits on resale pricing unless authorized by producers.
- The new legal framework increases compliance risks for businesses, leading to potential class action suits and regulatory scrutiny.

The Québec government has proposed new requirements for merchants offering subscriptions and platforms that resell event tickets. Bill 10, formally titled *An Act to protect consumers against abusive practices in ticket reselling and online subscription renewal*, amends the *Consumer Protection Act*.

Purpose of Bill 10

At its core, Bill 10 is designed to suppress certain practices associated with subscriptions and secondary ticket markets. The focus is on mandating design patterns and notice requirements to enhance transparency and ease of use for consumers. The bill seeks to make it easier for Québec residents to cancel subscriptions and it takes aim at resale at inflated prices absent an event producer's authorization.

Amendments brought on by the bill

Online subscriptions – mandating design patterns and notice requirements

Bill 10 mandates design and notice practices associated with subscription models. If passed, the bill will require the following:

- **Subscription cancellation buttons:** Merchants will be required to make a clearly labeled and easily accessible cancellation button available to consumers. The change targets a deceptive user interface design pattern known as "hard to cancel" (also known as the

"Roach Motel" pattern) that makes cancellations unduly difficult, as well as the requirement for a consumer to write to or call a merchant's customer service channel to seek cancellation of a subscription.

- **End of free trial/discounted price notices:** Merchants will be required to provide clear written notice reminding consumers of the date upon which a free trial or a discounted price ends, as well as the price that will be applied on that date. This notice will have to be sent to consumers between two and 10 days prior to the date upon which the free trial or discounted price ends.
- **Prominent one-time-charge disclosures:** When non-recurring fees (also known as one-time charges) are charged in addition to recurring fees, the non-recurring fees will need to be clearly and legibly indicated right next to the amount of the periodic payments.

Ticket resale practices redefined

Within the *Consumer Protection Act*, the bill tightens the rules around ticket resale practices. The major modifications contemplated include the following:

- **Prohibition of ticket transfer fees:** No fee for the transfer of a ticket can be charged.
- **Resale platform disclosure:** Digital platforms dedicated to ticket resale will be required to disclose, immediately upon a consumer accessing the site, clearly and prominently, that they are *resale* platforms. They will also be required to state that tickets may be available at a lower price from the official vendor authorized by the event producer.
- **Primary and secondary sale disclosure:** If a platform offers both primary sales and resales, it must simultaneously and in the same manner inform consumers that some tickets on the platform are resale tickets.
- **Ticket-specific disclosure:** Resale platforms are required to disclose certain information about each ticket, such as the original price, seat location and any applicable fees, in a manner that is transparent and readily understandable.
- **Sale must be for face value unless producer consents:** The resale price may not exceed the price announced by the authorized vendor unless certain conditions are met, such as obtaining the consent of the producer, in advance, to a higher resale price.
- **Prompt notice of cancellations:** The event producer must, as soon as possible, inform the authorized vendor and any reseller of any cancellation or any change to the event's schedule or location. In that event, any authorized vendor or reseller must, as soon as possible, inform the consumer of the same.
- **Resale platforms broadly captured:** Anyone who, by technological means, enables a third party to resell a ticket and receive payment is deemed, for the purposes of the cited provisions, to be reselling the ticket, charging the ticket price or facilitating the resale, thereby extending the associated obligations and liabilities to such platforms.

Legal risks and compliance

The bill's proposed requirements create a new legal framework for businesses that offer online subscriptions to consumers or that are in the ticket reselling sector, amplifying risk in class action matters and regulatory scrutiny. For example:

- **Increased class action risk for subscriptions:** Where subscription terms, pricing changes or cancellation procedures are not clearly presented — including the new requirement for an easily accessible cancellation button when applicable — businesses could face potential regulatory and class action risk based on these proposed new amendments.
- **Ticket resale platform pricing risk:** Dynamic pricing and resale markups, even when lawful in principle, can trigger claims that consumers were misled or overcharged. This bill heightens the importance of standardized and clear pricing information and may become an anchor for future claims if businesses fall short.
- **Prompt cancellation notice risk:** New risks arise from the lack of information in the case of cancellations, postponements and material changes of events. Disputes could be grounded in a lack of timeliness or clarity of communications, or even on refund or credit eligibility. Delays or ambiguities in notifying consumers and processing refunds could lead to alleged breaches of contract and contraventions to the new standards.

In sum, Bill 10 augments the compliance requirements for subscription contracts and ticket resale in Québec. For guidance aligned to your operations, consult us on the implications these provisions could have on your business and for practical risk-reduction measures to help prevent litigation.