

# Investing in Radiology to Drive Access, Innovation, and Economic Growth

The Canadian Association of Radiologists  
Written Submission for the Pre-Budget Consultations  
in Advance of the Upcoming Federal Budget



Canadian Association of Radiologists  
L'Association canadienne des radiologistes

## The Canadian Association of Radiologists recommends that the Government:

1. Invest \$5 million over five years to support a targeted Health Canada initiative aimed at strengthening the radiology workforce.
2. Make a \$50 million investment over 5 years in the Health Artificial Intelligence Validation Network (HAIVN) to ensure the safe, effective integration of AI in healthcare.
3. Support the national integration of Clinical Decision Support (CDS) systems into electronic medical records (EMRs) with a \$50 million investment over 5 years.
4. Guide an independent \$2 billion investment over 3 years to modernize Canada's radiology equipment stock.

## The Canadian Association of Radiologists (CAR) recommends targeted federal investments in people, technology, and infrastructure to enhance medical imaging capacity and ensure timely, equitable care across Canada.

**Radiology is a critical gateway to diagnosis and treatment.** Virtually every Canadian facing a serious illness or injury requires medical imaging to assess their condition. When access is delayed, treatment is delayed. Effective radiology depends on trained professionals, modern equipment, and timely access to diagnostic tests—particularly in a field increasingly reliant on advanced technologies and AI. Without these resources, patient care suffers.

**Demand for imaging is rising sharply.** Between 2007 and 2023, the number of MRI exams in Canada more than doubled, increasing by **117%**,<sup>i</sup> while CT exams rose by **90%**.<sup>ii</sup> This surge reflects growing clinical reliance on advanced imaging, yet wait times remain long, averaging **84 days for MRI** and **66 days for CT**, due to persistent workforce shortages and infrastructure constraints.

**The economic rationale is clear.** According to Deloitte, delayed diagnostics cost Canada an estimated **\$64 billion in lost GDP** and **\$6.1 billion in lost federal tax revenues** annually – equivalent to shutting down the entire chemical manufacturing sector.<sup>iii</sup> In 2023, more than **2 million Canadians** missed work while waiting for imaging. These delays are not only a barrier to care—they are a drag on national productivity and a source of preventable economic loss.

Radiology is also a powerful economic engine. In 2024, it contributed **\$5.3 billion to GDP** and supported over **71,500 jobs** in hospitals and clinics.<sup>iv</sup> Investments in imaging infrastructure generate ripple effects across sectors: manufacturing, software, real estate, and more.

## Every federal dollar invested in radiology supports jobs, supports innovation, and strengthens the healthcare system.



# People: Strengthening the Radiology Workforce

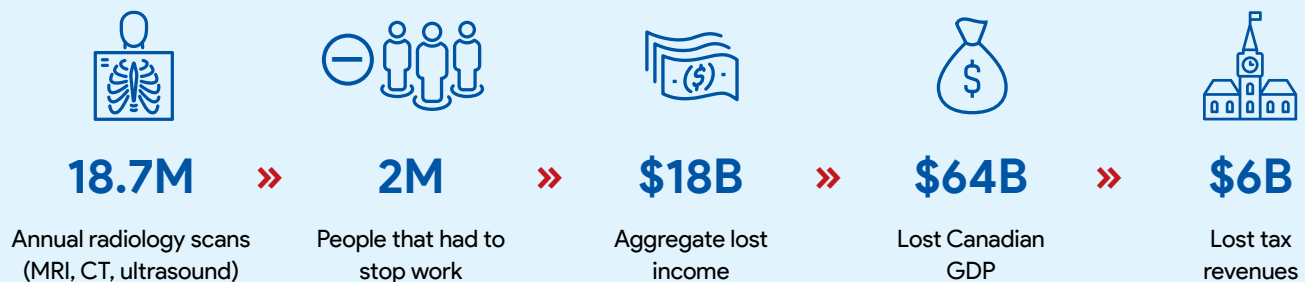
## Recommendation: Allocate \$5 million over five years to support a targeted Health Canada initiative aimed at strengthening the radiology workforce.

This investment will support the recruitment and retention of radiologists, medical radiation technologists (MRTs), and sonographers to reduce diagnostic backlogs, address critical vacancy rates, and build sustainable, high-quality careers in healthcare. By investing in this workforce, Canada can enhance system productivity, improve patient outcomes, and bolster economic resilience.

Radiology is not only a cornerstone of modern healthcare, but also a significant driver of Canada's economy. Yet Canada's imaging system is under intense strain due to persistent shortages. Vacancy rates are high, burnout is widespread, and training pipelines are insufficient to meet demand. These professionals are essential to timely diagnosis and treatment, but their capacity is stretched thin.

The consequences go beyond care delays. In a 2025 Nanos Research survey, **11.4% of imaging patients had to leave the workforce** while waiting for a scan.<sup>v</sup> This resulted in an estimated **\$17.9 billion in lost employment income**, **\$64 billion in lost GDP**, and **\$6.1 billion in lost tax revenues** in a single year.<sup>vi</sup> Imaging bottlenecks ripple across the system, increasing hospital admissions, prolonging illnesses, and compounding costs.

### Excessive wait times meant \$64B in lost GDP in 2023.



The CAR recommends that the federal government:

- Launch a national strategy to recruit and retain radiologists, MRTs, and sonographers, including:
  - Immediate funding for **at least 2,000 new technologists**.
  - Expansion of **training programs** and **bridging pathways** for internationally educated professionals.
  - Workforce support through **mental health investments** and **mobility initiatives**, including the reduction of interprovincial licensing barriers.

**A well-resourced workforce is essential to reducing wait times and restoring productivity. Over 80% of Canadians support federal investment in the education, hiring, and training of imaging professionals, and 6 in 10 support the use of AI to reduce diagnostic backlogs.**

Source: Nanos Survey 2025

# Technology: Enabling Safe, Scalable Innovation

**Recommendation: make a \$50 million investment over 5 years in the Health Artificial Intelligence Validation Network (HAIVN) to ensure the safe, effective integration of AI in healthcare.**

Artificial intelligence (AI) has the potential to transform the Canadian economy, improve the way we work, and enhance the quality of life for all Canadians. Recognizing this, the federal government committed \$2.4 billion to secure Canada's AI advantage and build the economy of the future.<sup>vii</sup> As Minister Solomon has emphasized, scaling AI across sectors is central to Canada's economic strategy,<sup>viii</sup> making it essential to pair innovation with infrastructure. In Canada's healthcare industry, as AI tools enter clinical use, robust validation frameworks are needed to ensure they are effective, equitable, and aligned with our values.

The CAR recommends federal support for the **Health Artificial Intelligence Validation Network (HAIVN)**: an independent, clinician-led body that provides post-market monitoring, clinical oversight, and real-world validation of AI tools in healthcare. HAIVN will assess not only safety and effectiveness, but also the ethical, and clinical implications of AI tools in patient care.

## A federal investment in HAIVN would:

- Strengthen Canada's AI ecosystem and support the growth of a **homegrown health tech sector**.
- Prevent **brain drain and loss of intellectual property** by enabling Canadian clinicians, developers, and researchers to contribute to meaningful AI deployments at home.
- Translate federal R&D investments into **real-world clinical applications**.
- Protect national **data sovereignty** by ensuring AI evaluation and implementation are led by Canadian experts.
- Ensure **workflow integration** that supports care delivery and avoids disruption.

HAIVN builds on Health Canada's role by offering the **post-market infrastructure** necessary for ongoing oversight. It fosters collaboration between innovators, regulators, and clinicians. HAIVN is already backed by national organizations, including the **Canadian Medical Association** and **Canadian Nurses Association**, and has a roster of expert advisors ready to deploy.

**The CAR is requesting a \$50 million federal investment** over 5 years to support HAIVN as an arms-length, self-sustaining entity, similar in model to Canadian Blood Services. Over time, HAIVN will generate revenue through service partnerships and certification models.

This is a pivotal moment. By acting now, Canada can become a global leader in **safe, values-driven AI in healthcare**, protecting patients, empowering providers, and ensuring innovation serves the public interest.

# Technology: Implementing Clinical Decision Support to Optimize Imaging Access

**Recommendation: support the national integration of Clinical Decision Support (CDS) systems into electronic medical records (EMRs) with a \$50 million investment over 5 years** to ensure patients receive the right test at the right time, reduce unnecessary imaging, and support evidence-based care.

As imaging demand rises, so does the risk of inappropriate or low-value scans. CDS systems embed national imaging guidelines into EMRs, helping clinicians order the appropriate test based on clinical need and established standards.

The CAR recommends that the federal government **spearhead the adoption of CDS systems** across provincial and territorial EMRs. A pan-Canadian CDS initiative would:

- Ensure patients receive **the right test, at the right time**.
- Improve **triage and wait time management**, prioritizing patients based on clinical urgency.
- Promote **evidence-based care** and reduce variation across jurisdictions.
- Enhance **system efficiency**, aligning with federal goals of productivity and cost-effectiveness.

CDS tools are already delivering results in peer countries like the UK and US. We can build on this international momentum with a made-in-Canada approach.

This is a smart digital infrastructure investment: one that supports the federal agenda on AI, efficiency, and healthcare modernization. With federal leadership, Canada can ensure that **every scan counts and every patient benefits**.



# Infrastructure: Modernizing Diagnostic Capacity

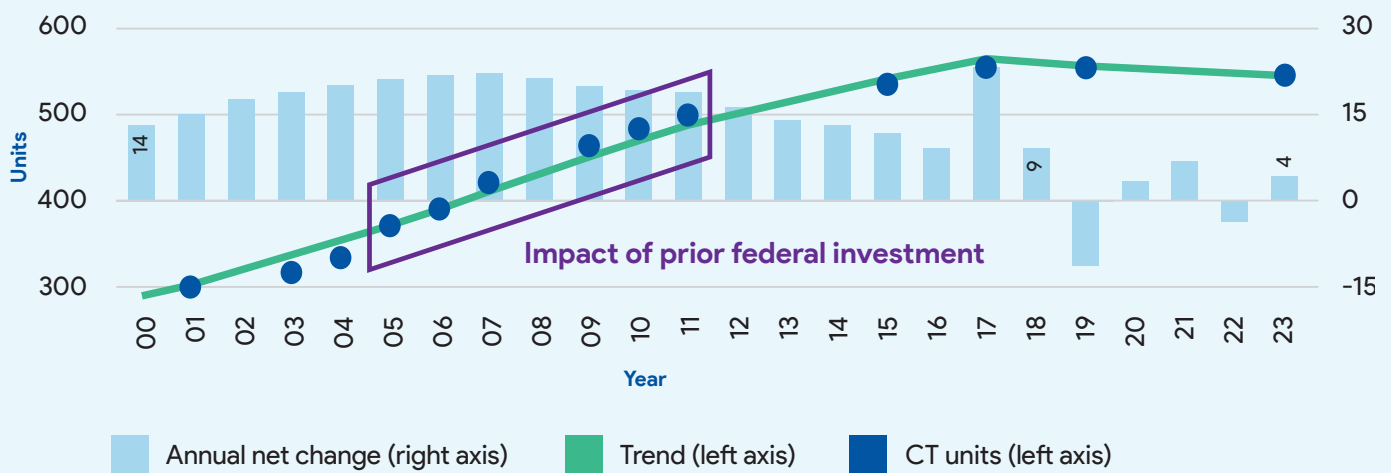
**Recommendation: Guide an independent \$2 billion investment over three years to modernize Canada’s radiology equipment stock.**

This should include streamlining procurement and installation to reduce costs and address critical infrastructure gaps, particularly in underserved communities.

Canada’s radiology infrastructure is aging. As of 2023, **37.2% of MRI units<sup>ix</sup>** and **33.4% of CT units\*** were more than 10 years old and in need of urgent replacement. This proportion has grown, especially in smaller institutions, leading to longer wait times and growing inequities.

**Figure 1: Stagnant Growth Trends in CT Units**

CT Machines, total units and annual net change, 2000–2023 Source: CDA and CIHI



The CAR recommends a **\$2 billion federal investment over three years** to renew Canada’s diagnostic imaging fleet. This includes MRI and CT scanners, ultrasound systems, and other essential tools.

This is not without precedent. In the early 2000s, the federal government made a one-time capital investment in diagnostic imaging infrastructure outside the Canada Health Transfer, recognizing the strategic importance of radiology. A similar investment today would allow Ottawa to act decisively on a national infrastructure issue that bilateral agreements alone cannot address.

This recommendation aligns with the Prime Minister’s 2025 mandate for capital investments that support **productivity, infrastructure renewal, and tangible benefits to Canadians**. Modernizing diagnostic infrastructure is a high-impact investment that stimulates job creation, supports Canadian manufacturing and tech sectors, and strengthens the foundation of a productive economy. By investing in radiology, the government can reduce wait times, improve health outcomes, and unlock economic value, while demonstrating national leadership in a domain that touches every Canadian.

# About the CAR

Since 1937, the CAR has been the national voice for radiologists in Canada, dedicated to imaging excellence and advocating for the highest standard of patient care across the country. We represent 3,000 radiologists who provide vital medical imaging for millions of patients.

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