

Digital Policy Hub – Working Paper

# Balancing Stakeholder Interests in Bill C-27

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## Key Points

- On June 16, 2022, the Canadian federal government introduced the Digital Charter Implementation Act (Bill C-27), a piece of legislation that seeks to protect Canadians' privacy and human rights in the digital age. One part of the bill, the Artificial Intelligence and Data Act (AIDA), aims to regulate the development and use of artificial intelligence (AI) systems by companies operating in Canada. Another part of the bill, the Consumer Privacy Protection Act (CPPA), aims to regulate the collection and use of Canadians' personal information by these companies.
- Since Bill C-27 was tabled in Parliament, it has been heavily criticized by technology companies, industrial associations, civil society organizations and other non-governmental actors and stakeholders.
- Both AIDA and the CPPA can be modified to better reflect the interests, and satisfy the demands, of non-governmental actors.

# Introduction

AI is a general-purpose technology that is quickly transforming all sectors of society, from health care and education to finance and commerce. As AI advances and proliferates, governments around the world are introducing legislation to regulate it. One example of such legislation is the Digital Charter Implementation Act (Bill C-27), which was introduced by the Canadian federal government on June 16, 2022 (Smith and Bronskill 2022). Bill C-27 is currently undergoing parliamentary review and has yet to be passed by the House of Commons. The bill consists of three parts: AIDA, the CPPA and the Data Protection Tribunal Act (DPTA). AIDA would require Canadian companies that develop or use AI systems (specifically “high-impact” AI systems) to establish strong AI oversight mechanisms, conduct regular AI risk assessments and inform the public about the design and performance of their AI systems.<sup>1</sup> The act would also create a new federal watchdog agency called the Office of the AI and Data Commissioner, which would ensure that companies comply with AI regulations by auditing their AI management, control and reporting procedures. The CPPA would impose new rules on Canadian companies with regard to the collection, use and sharing of peoples' personal information.<sup>2</sup> These rules would directly impact the development of AI in Canada because personal information is needed to train many AI systems, from chatbots to content moderation systems. Lastly, the DPTA would establish a tribunal to manage complaints from individuals and companies regarding the enforcement of the CPPA.

Since Bill C-27 was first tabled in the House of Commons, it has spurred intense discussion and debate among non-governmental actors and stakeholders, such as large technology companies, industrial associations, civil society organizations and academics. Some of these actors have tried to shape and influence Bill C-27 by lobbying public officials, engaging with the media about the bill and participating in formal

1 See <https://ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act-aida-companion-document>.

2 See <https://ised-isde.canada.ca/site/innovation-better-canada/en/consumer-privacy-protection-act>.

consultations organized by the federal government. These actors have demanded different changes to Bill C-27, given their various social and economic interests. Generally speaking, civil society actors have demanded that the bill be broader and more comprehensive, while industrial actors have demanded that it be more focused and targeted. Government actors have also expressed demands, but not as openly and publicly as their non-governmental counterparts. This paper has four goals: first, to identify the many actors that have contributed to the development of Bill C-27, or have sought to influence the bill; second, to document the different views, policy preferences and demands of these actors based on their written statements and, in some cases, their testimony to the Parliamentary Standing Committee on Industry and Technology; third, to determine which actors' views and preferences are currently reflected (or not reflected) in the bill; and fourth, to recommend ways to make the bill more representative of all actors' views and interests. The analysis presented in this paper covers the original version of Bill C-27, as well as the *AIDA Companion Document*, an addendum to the bill that clarifies and modifies certain elements of AIDA.<sup>3</sup> The analysis also covers the proposed amendments to Bill C-27, which were released by the federal government on October 23, 2023 (Innovation, Science and Economic Development Canada [ISED] 2023).

## Identifying the Policy Actors

Bill C-27 is being shaped and influenced by various actors in the public, private and non-profit sectors. The most important actor in the public sector is ISED, a federal department that both promotes and regulates economic activity in Canada. ISED drafted Bill C-27 in early 2022 under the leadership of its minister, François-Philippe Champagne, a former businessman with expertise in international trade. After Bill C-27 was tabled in Parliament on June 16, 2022, ISED began the process of amending the bill to clarify certain provisions and address certain stakeholder concerns. Throughout the amendment process, the department consulted with various non-governmental actors, most of whom were from industry (Clement 2023). Some notable actors that were consulted by ISED include Google Canada, Amazon, Cohere, the Canadian Chamber of Commerce and the Business Council of Canada. Another important actor in the public sector is the privacy commissioner of Canada, an agent of parliament who seeks to uphold Canadians' privacy rights. The privacy commissioner is responsible for investigating privacy violations committed by public and private organizations, and for advising policy makers on various privacy policy matters. When Bill C-27 was being developed in early 2022, Canada's then privacy commissioner, Daniel Therrien, provided direct input into the bill (Therrien 2023). On June 22, 2022, Therrien was replaced by Philippe Dufresne, who presented ISED with 15 recommendations to strengthen and improve Bill C-27, particularly its privacy provisions (Dufresne 2023; Office of the Privacy Commissioner of Canada 2023).

Like other major pieces of legislation, Bill C-27 has been reviewed by a parliamentary committee consisting of members of parliament from all major political parties. The committee tasked with reviewing the bill, the Parliamentary Standing Committee on

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<sup>3</sup> See <https://ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act-aida-companion-document>.

Industry and Technology (INDU), contains 12 members: six Liberals, four Conservatives, one New Democrat and Bloc Québécois. Since September 26, 2023, INDU has held 31 hearings on Bill C-27. During these hearings, committee members have discussed the strengths and weaknesses of the bill and have begun developing recommendations to revise and improve it. As part of this process, the committee has received testimony from various civil society organizations, including the Canadian Labour Congress, the Canadian Civil Liberties Association, the Directors' Guild of Canada and the Alliance of Canadian Cinema, Television and Radio Artists. The committee has also heard from various industrial or commercial organizations, most notably the Canadian Chamber of Commerce, the Canadian Bankers' Association, the Canadian Marketing Association, Amazon, Meta Platforms, Inc., Google Canada and Microsoft. Each organization has provided INDU with a written briefing expressing its views (both positive and negative) on Bill C-27. Some organizations have also sent representatives to speak at INDU hearings and answer questions from INDU members. Once the hearings are concluded, the committee will publish a report on the bill taking into account the views and perspectives of different stakeholders.

Before proceeding to the next section, it is important to highlight some key non-governmental actors or organizations that have sought to shape Bill C-27. One notable organization is the Canadian Chamber of Commerce, an industrial association that represents the interests of large businesses across Canada. As noted previously, the Canadian Chamber of Commerce is one of the organizations that testified to INDU and participated in ISED's formal consultation process on Bill C-27. In the fall of 2023, the Chamber established its own AI policy forum and advocacy body called the Future of Artificial Intelligence Council, which brings together a number of high-profile technology companies, including Amazon, BlackBerry, Meta Platforms, Inc., Cohere and Brainbox AI (Canadian Chamber of Commerce 2023a). This forum/body is currently lobbying the federal government to make changes to Bill C-27. Another notable organization is the Canadian Civil Liberties Association, a non-profit dedicated to protecting the civil rights and freedoms of Canadian citizens. Over the past two years, this organization has tried to influence the direction of Bill C-27 not only by testifying to INDU, but also by publishing open letters and conducting public-facing media campaigns (Canadian Civil Liberties Association 2023a; Konikoff 2023). Bill C-27 has also been the subject of vigorous discussion and advocacy among technology-focused think tanks, such as The Dais (based at Toronto Metropolitan University) and the Schwartz Reisman Institute for Technology and Society (based at the University of Toronto).

## Understanding the Actors' Views and Preferences

The Canadian Civil Liberties Association, the International Civil Liberties Monitoring Group and other civil society organizations are generally unhappy with Bill C-27, at least in its current form. In their view, the bill does not adequately protect Canadian society from the potential harms of AI or prepare Canadians to deal with the social and economic repercussions of this potentially highly disruptive technology (Canadian Civil Liberties Association 2023b; Centre for Digital Rights 2022). Many organizations have been highly critical of AIDA, the part of Bill C-27 that specifically regulates AI. One of

their main criticisms is that AIDA relies on a narrow and individualistic conception of “harm.” This point was made clearly by the Canadian Labour Congress in its testimony to INDU:

Currently, AIDA is intended in part “to prohibit certain conduct in relation to artificial intelligence systems that may result in serious harm to individuals or harm to their interests.” This should be revised to “prohibit conduct that may result in harm to individuals and groups,” and not just serious harm. Currently, AIDA’s focus is on individual harms but not societal risk (e.g. to the environment or Canadian democracy). Considered as a whole, the AI and Data Act is notably inferior to the European Union’s Artificial Intelligence Act, which recognizes the potential for broader society harms. (Canadian Labour Congress 2023, 3)

Perhaps the most egregious problem with AIDA, according to civil society organizations, is that its regulatory scope is limited to the private sector. As the Canadian Labour Congress has pointed out, AIDA’s provisions do not apply to AI systems used by government ministries and agencies at the federal level (Canadian Labour Congress 2023; Vipond 2023). This is problematic since many government ministries/agencies use AI systems that could be considered high impact. For example, Immigration, Refugees and Citizenship Canada is currently using an AI system to assess permanent residency applications and study permit applications (Karadeglija 2024). Similarly, Canada Border Services is using an AI system to predict whether individuals entering Canada are likely to commit crimes (Keung 2023). Civil society organizations believe that these systems could easily violate human rights and cause serious societal harm if they are not regulated under AIDA or a similar law (Canadian Civil Liberties Association 2023b).

Like civil society organizations, industrial or commercial organizations are extremely critical of AIDA, but for different reasons than those articulated above (Canadian Chamber of Commerce 2023b; Meta Platforms, Inc. 2023; Google Canada 2023; Foster 2024). According to these organizations, AIDA’s proposed regulatory framework is too vague and ambiguous, providing little guidance or direction to public and private stakeholders. Under this framework, “high-impact AI systems” would be subject to various regulatory measures, such as monitoring, risk assessment and government auditing. These systems are not clearly defined in the act, however, creating confusion and uncertainty for companies operating in Canada.<sup>4</sup> The Canadian Chamber of Commerce has pointed out that, under AIDA, relatively harmless and benign AI systems may be mistakenly and unjustifiably labelled as “high-impact systems” (Canadian Chamber of Commerce 2023b). Once given this erroneous label, these systems would be subject to unnecessary and burdensome regulations. This misdirected regulation would slow down the development and adoption of AI systems in Canada, undermining the country’s economic productivity and global economic competitiveness. Another concern revolves around the Office of the AI and Data Commissioner, the new watchdog agency that AIDA would create. This agency would have the ability to audit private companies by accessing their internal documents and communications, both remotely and in-person. Some companies view the agency’s proposed audit powers as excessive

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4 In the fall of 2023, ISED amended AIDA to clarify certain terms and provisions in the act (ISED 2023). The amended version of the act identifies seven categories of high-impact systems, including content moderation systems, biometric processing systems and automated policing systems. However, many companies and industrial associations feel that these categories are too broad (Canadian Chamber of Commerce 2023b; Microsoft 2024; Foster 2024).

and highly invasive (Meta Platforms Inc. 2023). Canada's business community has also expressed serious concerns about AIDA's reporting requirements and criminal liability provisions, both of which could supposedly discourage investment in Canada's AI and high-tech sectors (Canadian Chamber of Commerce 2023b; Canadian Bankers' Association 2024).

While AIDA has received considerable attention from non-governmental actors, the CPPA has arguably received even more attention. Before exploring these actors' views on the CPPA, it is important to examine the content of the act itself. As noted in the introduction, the CPPA seeks to regulate the collection and use of peoples' personal information by Canadian companies.<sup>5</sup> Building upon the Personal Information Protection and Electronic Documents Act (PIPEDA), the CPPA would require any company operating in Canada to obtain an individual's consent before collecting and using their personal information, whether that information relates to their ethnicity, sexuality, hobbies, life experiences, political and religious beliefs or consumer preferences. There are certain provisions in the act, however, that would exempt a company from this requirement. For example, section 18(3) of the CPPA would allow a company to collect and use an individual's personal information without their consent if "the collection or use is made for the purpose of an activity in which the [company] has a legitimate interest that outweighs any potential adverse effect on the individual resulting from that collection or use" (Charland, Savoie and van den Berg 2022, 11). Similarly, section 18(2) would allow a company to collect personal information without consent if that information is "necessary for the organization's information, system or network security" or is "necessary for the safety of a product or service that the organization provides" (ibid.). Another notable provision of the CPPA is section 51, which would allow a company to freely collect and use any personal information that is publicly accessible on platforms such as Instagram, LinkedIn, TikTok and Facebook. Through these provisions, CPPA would ensure that Canadian companies have easy and unimpeded access to personal information, which they need in order to carry out research and development activities, including the training of AI systems.

Many civil society organizations and legal scholars view the CPPA as a deeply flawed and problematic privacy law that would prioritize commercial interests over public interests (Centre for Digital Rights 2022; Canadian Civil Liberties Association 2023b; Right2YourFace Coalition 2023; Scassa 2023; McPhail 2023). In their view, this act would establish a *laissez-faire* and industry-friendly regulatory framework, allowing companies to recklessly exploit Canadians' personal information for profit. Instead of rejecting the CPPA entirely, however, these actors have recommended radical changes to the act. For instance, the Canadian Civil Liberties Association has recommended the removal of sections 18(2) and 18(3), both of which would enable the non-consensual collection and use of personal information by Canadian companies (Canadian Civil Liberties Association 2023b). The organization has also recommended that the act enshrine privacy as a fundamental human right, a recommendation that has been echoed by the Privacy Commissioner of Canada (Office of the Privacy Commissioner of Canada 2023; Therrien 2023). In contrast, industrial or commercial organizations view the CPPA as a fair and reasonable privacy law that would protect Canadians' privacy rights without hurting business interests or stifling technological innovation. According to the Canadian Marketing Association, which represents a number of Canadian-owned and multinational technology companies, the

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5 See <https://ised-isde.canada.ca/site/innovation-better-canada/en/consumer-privacy-protection-act>.

CPPA would introduce “strong and modernized protections for consumers while ensuring that Canadian businesses can leverage data to secure a competitive economic position in the global digital economy” (Canadian Marketing Association 2022, 19). It should be noted that, while industrial/commercial organizations generally approve of the CPPA, some have recommended minor technical revisions to the act (Google Canada 2022; Canadian Bankers’ Association 2023; Canadian Chamber of Commerce 2023c).

## Discussion and Recommendations

The previous section explored how Bill C-27 is viewed by different policy actors, especially by non-governmental actors such as civil society organizations, technology companies and industrial associations. One of the key findings was that most non-governmental actors are deeply unsatisfied with AIDA. Civil society organizations strongly dislike AIDA because of its narrow conception of “harm” and its limited regulatory scope, while technology companies and industrial associations dislike the act because of its vague terminology, onerous reporting requirements, excessive auditing provisions and strong legal penalties. While AIDA has received universal condemnation from non-governmental actors, the CPPA has received mixed a reception. Civil society actors are extremely critical of the CPPA because it allows companies to collect and use Canadians’ personal information without their consent under certain conditions. In their view, the act sacrifices Canadians’ privacy rights in the interest of economic growth and technological innovation. By contrast, industrial actors view the CPPA quite favourably.

Clearly, Bill C-27 is an unpopular and divisive piece of legislation. As noted above, AIDA is almost universally disliked by non-governmental actors, while only industrial or commercial actors like the CPPA. This raises an important question: how can Bill C-27 be improved? How can the bill be more responsive to the interests and demands of citizens, civil society and industry? The following recommendations are intended to ensure that both AIDA and the CPPA reflect a balanced mix of stakeholder interests:

- **AIDA should define and classify “high-impact AI systems” with greater clarity and precision.** Currently, the act identifies seven categories of high-impact systems, including employment screening systems, content moderation systems and biometric processing systems. Each category is very broad, encompassing many technologies with different risk profiles. For example, biometric processing systems encompass facial recognition technologies, speech-to-text technologies, fitness trackers and virtual reality headsets. Some of these technologies are potentially dangerous to individuals and society, and should be subject to monitoring, risk assessment and auditing. Other technologies are totally harmless and should be spared such regulation. It is important that each category be narrowed so as to exclude low-risk technologies that pose no real threat to society. By shrinking the boundaries of these categories, federal regulators would prevent over-regulation or misdirected regulation, which is a major concern of industry.
- **AIDA’s regulatory provisions should not only apply to private companies, but also to the federal government’s own departments and agencies, such as Health Canada, the Canada Border Services Agency, the Department of National Defence and the**



**Canadian Security Intelligence Service.** If the act is applied to the public sector, then it would help prevent civil servants from misusing AI systems, whether intentionally or unintentionally. It would also allow civil servants to identify and mitigate any harmful outcomes produced by their AI systems, especially if the act is combined with the Directive on Automated Decision-Making (Treasury Board of Canada Secretariat 2021).

- **Section 18(3) of the CPPA should be heavily modified to protect Canadians' privacy rights.** Let us recall that this provision of the CPPA would allow a Canadian company to collect and use an individual's personal information without their consent if the collection and use of this information advances the company's "legitimate interests" and does not significantly harm the individual. As some civil society organizations have pointed out, this provision contains many gaps and ambiguities and can be easily abused by unscrupulous companies. It is therefore necessary to establish safeguards and restrictions around the provision. Instead of allowing the non-consensual collection and use of *all* personal information, the provision should only allow the non-consensual collection and use of "non-sensitive" personal information.

## Conclusion

Bill C-27 is a landmark piece of legislation that would update Canada's privacy protection laws and introduce regulations that specifically target AI. This paper provided a general overview of the policy ecosystem or policy network surrounding the bill. It identified the various policy actors that have shaped or sought to influence the bill and discussed the different views and preferences of these actors. Particular attention was given to non-governmental actors, such as civil society organizations, technology companies and industrial associations. This focus on non-governmental actors is consistent with growing scholarly interest in collaborative governance, a mode of political decision making and policy making in which people from industry and civil society actively contribute to policy development and implementation (Doberstein 2016; Rocan 2018; Wang and Ran 2023). At the end of the paper, it was argued that Bill C-27 should be modified to better reflect the interests of non-governmental actors, many of whom are deeply critical of the bill. It is important to note that this paper did not explore the complex power relations between civil society and industrial actors, and between governmental and non-governmental actors. Without examining these power relations, it is impossible to fully understand the policy-making process driving and shaping Bill C-27 or make sense of the bill's ongoing evolution. These issues of power will be addressed in a future paper.

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Elia Rasky holds a Ph.D. in political science from York University. He is a Digital Policy Hub post-doctoral fellow with research interests including Canadian politics, global political economy, and

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## Works Cited

- Canadian Bankers' Association. 2023. "CBA Recommendations – Bill C-27 CPPA." Submission to Standing Committee on Industry and Technology. October 24. <https://cba.ca/cba-recommendations-on-bill-c-27-consumer-privacy-protection-act>.
- – –. 2024. "Briefing Document – CBA Recommendations: Bill C-27 *Artificial Intelligence and Data Act*." Submission to Standing Committee on Industry and Technology. January 6. [www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12912951/br-external/CanadianBankersAssociation-AIDA-e.pdf](http://www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12912951/br-external/CanadianBankersAssociation-AIDA-e.pdf).
- Canadian Civil Liberties Association. 2023a. "CCLA Demands Action on Facial Recognition Technology and the Growing Power of Artificial Intelligence." Press release, June 21. <https://ccla.org/press-release/ccla-demands-action-on-facial-recognition-technology-and-the-growing-power-of-artificial-intelligence>.
- – –. 2023b. "Submission to the Standing Committee on Industry and Technology regarding Bill C-27, An Act to enact the Consumer Privacy Protection Act, the Personal Information and Data Protection Tribunal Act and the Artificial Intelligence and Data Act and to make consequential and related amendments to other Acts." September 12. <https://ccla.org/wp-content/uploads/2023/09/Bill-C-27-Submission-to-INDU-CCLA.pdf>.
- Canadian Chamber of Commerce. 2023a. "The Future of AI Council Launches As AI Comes Under Global Scrutiny." News release, November 20. <https://chamber.ca/news/the-future-of-ai-council-launches-as-ai-comes-under-global-scrutiny/>.
- – –. 2023b. "Artificial Intelligence and Data Act (AIDA)." Submission to the Standing Committee on Industry and Technology. November 23. [https://chamber.ca/wp-content/uploads/2024/01/Canadian-Chamber-of-Commerce-Bill-C-27-Amendments-Response-Letter\\_FINAL.pdf](https://chamber.ca/wp-content/uploads/2024/01/Canadian-Chamber-of-Commerce-Bill-C-27-Amendments-Response-Letter_FINAL.pdf).
- Canadian Labour Congress. 2023. "The Artificial Intelligence and Data Act (AIDA)." Submission to the Standing Committee on Industry and Technology. November. [www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12711885/br-external/CanadianLabourCongress-e.pdf](http://www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12711885/br-external/CanadianLabourCongress-e.pdf).
- Canadian Marketing Association. 2022. *Canada's Privacy Law Priorities: Better Protections for Canadians + Innovation for Economic Growth*. October. [https://thecma.ca/docs/default-source/default-document-library/report\\_privacy-law-priorities-2022.pdf](https://thecma.ca/docs/default-source/default-document-library/report_privacy-law-priorities-2022.pdf).
- Centre for Digital Rights. 2022. *Not Fit For Purpose—Canada Deserves Much Better: Centre for Digital Rights' Report on Bill C-27*. October 8. <https://centrefordigitalrights.org/files/document/2023-10-13/263-091316.pdf>.
- Charland, Sabrina, Alexandra Savoie and Ryan van den Berg. 2022. "Legislative Summary of Bill C-27: An Act to enact the Consumer Privacy Protection Act, the Personal Information and Data Protection Tribunal Act and the Artificial Intelligence and Data Act." Publication No. 44-1-C27-E, Library of Parliament. July 12. [https://lop.parl.ca/sites/PublicWebsite/default/en\\_CA/ResearchPublications/LegislativeSummaries/441C27E](https://lop.parl.ca/sites/PublicWebsite/default/en_CA/ResearchPublications/LegislativeSummaries/441C27E).
- Clement, Andrew. 2023. "Preliminary analysis of ISED's C-27 list of 300+ Stakeholder consultation meetings." December 6. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4658004](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4658004).
- Doberstein, Carey. 2016. *Building a Collaborative Advantage: Network Governance and Homelessness Policy-Making in Canada*. Vancouver, BC: UBC Press.

- Dufresne, Philippe. 2023. "Evidence." House of Commons Standing Committee on Industry and Technology. 1st Sess., 44th Parl., Meeting No. 90. October 19. [www.ourcommons.ca/DocumentViewer/en/44-1/INDU/meeting-90/evidence](http://www.ourcommons.ca/DocumentViewer/en/44-1/INDU/meeting-90/evidence).
- Foster, Nicole. 2024. "Evidence." House of Commons Standing Committee on Industry and Technology. 1st Sess., 44th Parl., Meeting No. 109. February 7. [www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12872520/INDUEV109-E.PDF](http://www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12872520/INDUEV109-E.PDF).
- Google Canada. 2022. "Brief presented to the Standing Committee on Industry and Technology (INDU) on the Consumer Protection and Privacy Act (CPPA) within the Digital Charter Implementation Act (Bill C-27)." [www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12951089/br-external/GoogleCanada-ConsumerAndPrivacyAct-e.pdf](http://www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12951089/br-external/GoogleCanada-ConsumerAndPrivacyAct-e.pdf).
- – –. 2023. "Brief presented to Canada's House of Commons Standing Committee on Industry and Technology on the AI and Data Act, as part of the Digital Charter Implementation Act (Bill C-27)." [www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12951103/br-external/GoogleCanada-AIAndDataAct-e.pdf](http://www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12951103/br-external/GoogleCanada-AIAndDataAct-e.pdf).
- Karadeglija, Anja. 2024. "Federal government use of AI in hundreds of initiatives revealed by new research database." CBC News, April 11. [www.cbc.ca/news/politics/federal-government-used-ai-1.7170307](http://www.cbc.ca/news/politics/federal-government-used-ai-1.7170307).
- Keung, Nicholas. 2023. "How AI is helping Canada keep some people out of the country. And why there are those who say it's a problem." *Toronto Star*, June 2. [www.thestar.com/news/canada/how-ai-is-helping-canada-keep-some-people-out-of-the-country-and-why-there/article\\_ea4dc715-debf-50e1-94c2-fda48a91dd09.html](http://www.thestar.com/news/canada/how-ai-is-helping-canada-keep-some-people-out-of-the-country-and-why-there/article_ea4dc715-debf-50e1-94c2-fda48a91dd09.html).
- Konikoff, Daniel. 2023. "Evidence." House of Commons Standing Committee on Industry and Technology. 1st Sess., 44th Parl., Meeting No. 94. November 2. [www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12684242/INDUEV94-E.PDF](http://www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12684242/INDUEV94-E.PDF).
- McPhail, Brenda. 2023. "Evidence." October 26. House of Commons Standing Committee on Industry and Technology. 1st Sess., 44th Parl., Meeting No. 92. [www.noscommunes.ca/documentviewer/en/44-1/INDU/meeting-92/evidence](http://www.noscommunes.ca/documentviewer/en/44-1/INDU/meeting-92/evidence).
- Meta Platforms, Inc. 2023. "Canada Bill C-27 (AIDA) – Proposed Amendments." February. [www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12948163/br-external/MetaPlatformsInc-e.pdf](http://www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12948163/br-external/MetaPlatformsInc-e.pdf).
- Microsoft. 2024. "Submission to INDU Committee regarding Part 3 of Bill C-27 (Artificial Intelligence and Data Act)." March 1. [www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12952958/br-external/Microsoft-e.pdf](http://www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12952958/br-external/Microsoft-e.pdf).
- Office of the Privacy Commissioner of Canada. 2023. "Submission of the Office of the Privacy Commissioner of Canada on Bill C-27, the *Digital Charter Implementation Act, 2022*." April. [www.priv.gc.ca/en/opc-actions-and-decisions/submissions-to-consultations/sub\\_indu\\_c27\\_2304/](http://www.priv.gc.ca/en/opc-actions-and-decisions/submissions-to-consultations/sub_indu_c27_2304/).
- Right2YourFace Coalition. 2023. "Joint letter on Bill C-27's impact on oversight of facial recognition technology." <https://ccla.org/wp-content/uploads/2023/11/Open-letter-on-Bill-C-27.pdf>.
- Rocan, Claude M. 2018. "Introduction." In *Building Bridges: Case Studies in Collaborative Governance in Canada*, edited by Claude M. Rocan, 1–21. Ottawa, ON: Invenire.
- Scassa, Teresa. 2023. "Evidence." House of Commons Standing Committee on Industry and Technology. 1st Sess., 44th Parl., Meeting No. 92. October 26. [www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12657725/INDUEV92-E.PDF](http://www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12657725/INDUEV92-E.PDF).

- Smith, Marie-Danielle and Jim Bronskill. 2022. "Privacy bill sets out rules on use of personal data, artificial intelligence." CBC News, June 16. [www.cbc.ca/news/politics/privacy-bill-artificial-intelligence-1.6490665](http://www.cbc.ca/news/politics/privacy-bill-artificial-intelligence-1.6490665).
- Therrien, Daniel. 2023. "Evidence." House of Commons Standing Committee on Industry and Technology. 1st Sess., 44th Parl., Meeting No. 91. October 24. [www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12645342/INDUEV91-E.PDF](http://www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12645342/INDUEV91-E.PDF).
- Treasury Board of Canada Secretariat. 2021. "Directive on Automated Decision-Making." March 29. <https://publications.gc.ca/site/eng/9.899938/publication.html>.
- Vipond, Siobhán. 2023. "Evidence." House of Commons Standing Committee on Industry and Technology. 1st Sess., 44th Parl., Meeting No. 93. October 31. [www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12671203/INDUEV93-E.PDF](http://www.ourcommons.ca/Content/Committee/441/INDU/Evidence/EV12671203/INDUEV93-E.PDF).
- Wang, Haunming and Bing Ran. 2023. "Network governance and collaborative governance: a thematic analysis on their similarities, differences, and entanglements." *Public Management Review* 25 (6): 1187–211. <https://doi.org/10.1080/14719037.2021.2011389>.