

April 24, 2024

To: The Honourable François-Philippe Champagne, P.C., M.P., Minister of Innovation, Science and Industry

CC: Joël Lightbound, Chair of the Standing Committee on Industry and Technology
Rick Perkins, Vice-Chair of the Standing Committee on Industry and Technology
Jean-Denis Garon, Vice-Chair of the Standing Committee on Industry and Technology
Members of the Standing Committee on Industry and Technology

RE: Joint call for AIDA to be sent back for meaningful public consultation and redrafting

Dear Minister,

The undersigned organizations and experts are deeply concerned about the development and drafting of the proposed Artificial Intelligence and Data Act (AIDA). Our concerns have only increased as a result of the hasty, confusing, and rushed study of the legislation at the Standing Committee on Industry and Technology (INDU).

This study has revealed the depth of the flaws in both the legislation and the consultation process itself. The flaws in the legislation are demonstrated by both the exceptionally broad scope of the [amendments](#) proposed by your own office on November 28, 2023 and the [Priority Recommendations Package](#) submitted to INDU in early March by several signatories to this letter. The flaws in the process, on the other hand, are evident from the diversity of voices – from the Assembly of First Nations (AFN) to the Canadian Chamber of Commerce – which have recently called for additional consultation before AIDA is passed.¹

We write to amplify these important voices and to add to their number. We call on you to split AIDA from the rest of Bill C-27, and send it back for the full, meaningful public consultation and redrafting it so clearly requires.

The regulation of AI in Canada is of vital importance to the futures of a wide range of organizations and individuals across Canada whose voices have yet to be heard as Bill C-27 marches towards clause-by-clause review. In particular, the AFN stated in its [submission](#) that "the process is flawed because there was no Nation-to-Nation consultation between Canada

¹ See the Assembly of First Nations brief to INDU, dated October 2023 and published to the INDU website on 13 February 2024, and the Canadian Chamber of Commerce's letter to INDU, dated 13 February 2024, published to the INDU website as a brief on 6 March 2024.

and First Nations.” Your letter to INDU of March 12, 2024 offers no indication that such Nation-to-Nation consultation regarding AIDA took place prior to Bill C-27’s introduction in Parliament.

It is no fault of INDU – which had the daunting, perhaps impossible, task of studying both the privacy and AI provisions of Bill C-27 within the logistical confines of the committee process and parliamentary calendar – that its study proved not to be an adequate replacement for the fulsome consultation with Indigenous rights-holders, civil society, the private sector, and other stakeholders that should have taken place prior to AIDA’s introduction.

The signatories to this letter were either not consulted adequately or not consulted at all during AIDA’s development process. Our substantive concerns with AIDA vary, but we all agree that the inadequacy of this consultation process has resulted in a gravely and fundamentally flawed bill that lacks democratic legitimacy.

Accordingly, we urge you to withdraw AIDA from parliamentary consideration, and initiate an in-depth and meaningful consultation process involving a broad range of stakeholders, rights holders, and relevant government agencies, before reintroducing it in revised form. At this juncture, this is the only approach that will ensure that people across Canada get the sound AI legislation they deserve.

Signed:

Organizations:

1. Amnesty International Canadian Section (English-speaking)
2. BC Civil Liberties Association
3. Canadian Arab Federation
4. Canadian Civil Liberties Association
5. Canadian Muslim Public Affairs Council
6. Centre for Digital Rights
7. Centre for Free Expression
8. Communications Program, Glendon College, York University
9. Digital Public
10. Fédération nationale des enseignantes et enseignants du Québec (FNEEQ-CSN)
11. Firearms Institute for Rational Education
12. International Civil Liberties Monitoring Group
13. Inter Pares
14. Just Peace Advocates/Mouvement Pour Une Paix Juste
15. Ligue des droits et libertés
16. Macdonald-Laurier Institute
17. Mines Action Canada

18. National Union of Public and General Employees (NUPGE)
19. NSTP Consulting Corp.
20. OpenMedia
21. Privacy and Access Council of Canada
22. Response Marketing Association
23. Rideau Institute on International Affairs
24. Tech Reset Canada

Individuals:

1. Alessandra Renzi, Associate Professor, Concordia University
2. Alexandra Flynn, Associate Professor, UBC
3. Andrew Clement, Professor emeritus, University of Toronto
4. Azeezah Kanji, legal academic and journalist
5. Bianca Wylie, writer and public technology advocate
6. Dr. Blayne Haggart, Associate Professor, Department of Political Science, Brock University
7. Dr. Brenda McPhail, Public Policy Program, McMaster University
8. Christelle Tessono, Technology Policy Researcher University of Toronto
9. Dr. Colin Bennett, Professor, University of Victoria
10. Daniel Konikoff, University of Toronto
11. Evan Light, Associate Professor, York University
12. Fenwick McKelvey, Associate Professor, Concordia University
13. Jane Bailey, Professor, University of Ottawa Faculty of Law
14. Joanna Redden, Associate Professor, Western University
15. Jonathan Obar, Associate Professor, York University
16. Jonathan Roberge, professeur titulaire, INRS
17. Dr. Kate Milberry
18. Dr. Kate Tillecczek, York University
19. Dr. Kristen Thomasen, Assistant Professor, UBC
20. Leslie Shade, Faculty of Information, University of Toronto
21. Luke Stark, Assistant Professor, Western University
22. Mariette Pilon, avocate, membre du Barreau du Québec
23. Dr. Mary Ott, Assistant Professor, York University
24. Matt Malone, Assistant Professor, Thompson Rivers University
25. Natasha Tusikov, Associate Professor, Department of Social Science, York University
26. Nicole St-Pierre, President, NSTP Consulting Corp.
27. Nkechi E. Agugoesi, Internationally Trained Lawyer
28. Ori Freiman, Digital Society Lab at McMaster University

29. Sara M. Grimes, Professor, University of Toronto
30. Dr. sava sahari singh, York University
31. Sharon Polsky, President of the Privacy and Access Council of Canada
32. Spencer Izen, Researcher, B.C. Freedom of Information and Privacy Association
33. Sun-ha Hong, Assistant Professor, Simon Fraser University
34. Tamir Israel, Technology & Human Rights Lawyer