October 20, 2025

BY EMAIL

The Honourable Karina Gould, P.C., M.P.
Chair, Standing Committee on Finance
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6

Dear Madam Chair,

I am writing to share my observations related to Bill C-4, the Making Life More Affordable for Canadians Act, Part 4 of which proposes new requirements regarding the privacy policy obligations of federal political parties. Although the goal of Bill C-4 is to establish a national regime applicable to all parties, the text as proposed presents several operational challenges.

Bill C-4 stipulates that a party's failure to comply with its own privacy policy would now constitute a violation falling under my compliance and enforcement mandate. When a contravention constitutes a violation rather than an offence, only the administrative regime can apply. Without the additional requirements listed below, administrative investigation tools and resources, it may be difficult to fully carry out this new mandate. Furthermore, the requirement to enforce individual party policies instead of monitoring and enforcing the same rules for all would have a significant impact on our operations.

For these reasons, I would like to draw your attention to the recommendations I made related to Bill C-65, the *Electoral Participation Act*, introduced during the 44th Parliament, relating to the protection of personal information:

- Introduce specific tools and powers tailored to administrative investigations, particularly with regard to compelling witness and the preservation and production of documents and other evidence without having to obtain prior judicial authorization. For example, Parliament has made these tools available to certain federal agencies, including the future Foreign Influence Transparency Commissioner and the Canadian Radio-television and Telecommunications Commission.
- Require political parties and their affiliated entities (candidates, nomination contestants, leadership contestants and constituency associations) to retain

relevant documents for a specified period of time and to provide them to me upon request.

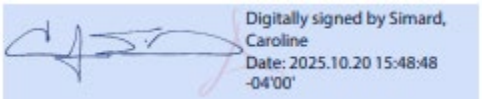
- Consider whether this bill should instead set minimum, rigorous requirements common to all parties, to which compliance and enforcement measures would apply.

In closing, Bill C-4 proposes that registered and eligible parties, as well as “any person or entity acting on the party’s behalf,” be required to comply with the party’s privacy policy. However, it does not explicitly state whether the provisions of the bill would also apply to nomination or leadership candidates or to campaign volunteers for candidates or riding associations. Most people with access to the voters list are candidate volunteers, not employees of parties or party associations. Furthermore, even if candidates and riding associations are registered, these entities do not act on behalf of a party and therefore their activities may not be covered by these new provisions. It would therefore be important to further clarify the scope of the provisions of Bill C-4 in order to avoid legal uncertainty.

Implementing these recommendations would enable me to respond more effectively to this new mandate and achieve the objective of the bill.

Thank you for your time. I remain available to answer any questions the Committee may have.

Sincerely,



Caroline J. Simard
Commissioner of Canada Elections