



December 10, 2015

Hon. Scott Brison, P.C., M.P.
President of the Treasury Board
90 Elgin Street
Ottawa, Ontario K1A 0R5

Dear Minister:

In October, the Canadian Chamber of Commerce concluded its 86th Annual General Meeting (AGM) in Ottawa. A major highlight of the Canadian Chamber's AGM is the Policy Session. It is during the Policy Session that resolutions submitted by local chambers of commerce and boards of trade from throughout Canada are debated and voted on by accredited delegates. Once approved, these resolutions become policy of the Canadian Chamber for the following three years. In 2015, our delegates issued a clear and decisive national policy mandate that we intend to pursue vigorously with the federal government over the coming months.

Our renewed national policy mandate includes the following issues that fall within your portfolio.

Timely, Reliable, Comparable Government Data for Canada's Businesses

Data is critical to businesses of all sizes to identify new markets and customers, clients at risk, etc. Digital technologies have made it possible for smaller businesses to access and use data in ways that were once only possible for larger companies.

In October 2014, the federal government issued a mandatory Open by Default policy requiring federal departments and agencies to maximize the release of their data and information, subject to applicable restrictions related to privacy, confidentiality, and security.

It is one thing to have "open" access to government data, however, the utility of that data is compromised if it is outdated and its reliability is questionable due to it being difficult and/or impossible to compare with data previously collected, for example comparing 2011 National Household Survey data to 2006 Census data.

Office of the President and Chief Executive Officer | Cabinet du président et chef de la direction

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The Canadian Chamber recommends the federal government:

1. Continue its efforts to collect and present defensible data in a centrally-accessible, consistently formatted manner.
2. Continue working with the provinces/territories and municipalities to release data that is standardized, in open formats, at little to no cost and never more than cost recovery, and without restrictions.
3. Ensure that Statistics Canada has the ability to deliver data that is timely and reliable to meet Canadian business needs.
4. Communicate the representation of private sector, municipalities and NGOs on Statistics Canada's advisory committees, the process for membership rotation and how stakeholders can identify their interest in participating.

I have also written to Minister Bains regarding this resolution.

Alignment of Federal and Provincial Liens Policies

The misalignment of federal and provincial policies regarding liens on derelict properties continues to create hardships for municipalities while slowing recovery and growth.

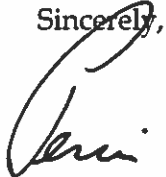
The Canadian Chamber recommends that the federal government:

1. Immediately allow for the removal of federal liens against a property by establishing and maintaining lien policies that are in alignment with those of provincial/territorial governments.
2. Work collaboratively with provincial/territorial governments to establish and maintain a nationally consistent, coordinated approach to removing Crown liens and tax arrears on qualified properties.

I have also written to Ministers Morneau and LeBouthillier regarding this resolution given as its subject also falls within their portfolios.

Copies of the complete texts of these resolutions are attached.

Sincerely,



Perrin Beatty
President and Chief Executive Officer

*Every good wish for success
in your new role, Steve!*



Attachments

Timely, Reliable, Comparable Government Data for Canada's Businesses

Data is critical to businesses of all sizes to identify new markets and customers, clients at risk, etc. Digital technologies have made it possible for smaller businesses to access and use data in ways that were once only possible for larger companies.

In September 2014, delegates to the Canadian Chamber's annual general meeting adopted a policy resolution calling upon the federal government to reinstate the mandatory Long-Form Census in 2016 in the interests of ensuring that businesses and other stakeholders – including municipalities – have reliable, comparable data to make decisions ranging from which markets to promote themselves in to planning (in the case of municipalities) critical infrastructure investments.

In October 2014, the federal government issued a mandatory Open by Default policy requiring federal departments and agencies to maximize the release of their data and information, subject to applicable restrictions related to privacy, confidentiality, and security. As a result, eligible data and information will be released in standardized, open formats, free of charge, and without restrictions on reuse. This follows the federal government's 2013 announcement that it intends to work with provinces, territories, and municipalities to break down barriers to integrated, pan-Canadian open data services. This is no small task given many government programs and services cut across multiple jurisdictions (e.g., health and transportation).

It is one thing to have "open" access to government data, however, the utility of that data is compromised if it is outdated and its reliability is questionable due to it being difficult and/or impossible to compare with data previously collected, for example comparing 2011 National Household Survey data to 2006 Census data.

The federal agency responsible for ensuring "...Canadians have access to a trusted source of statistics on Canada to meet their highest priority needs"¹ is Statistics Canada. *The Statistics Canada Act* "requires that Statistics Canada collect, compile, analyze and publish statistical information on the economic, social and general conditions of the country and its people. It also requires that Statistics Canada conduct a census of population and a census of agriculture every fifth year, and that the Agency protect the confidentiality of the information with which it is entrusted."²

While the federal government's Open by Default initiative is a step in the right direction, businesses of all sizes rely heavily upon the data provided by Statistics Canada. While the 2015-16 Main Estimates for Statistics Canada call for its budget to increase by 28 per cent (\$149.8 million), this is the first increase in the agency's budget since the 2011-12 budget year. All but \$640,000 of this increase is being devoted to the 2016 Census of Population and 2016 Census of Agriculture.³

¹ Treasury Board Secretariat, 2015-16 Main Estimates Parts I and II The Government Expenditure Plan and Main Estimates, page II-259

² Ibid.

³ Ibid.

For three consecutive federal fiscal years (2012-13, 2013-14 and 2014-15) the budget of Statistics Canada has been cut by \$286.9 million⁴, \$54.1million⁵ and \$15.6 million⁶ respectively. The decreases of the latter two fiscal years is explained as being the result of the Budget 2012 Spending Review which demanded cuts from all departments and agencies as the government worked towards its commitment to eliminate the federal deficit by 2015.

Not only has the elimination of the mandatory long-form census - the core survey to which many other surveys are tied - had serious implications for business people, economists, urban planners and others, cuts to Statistics Canada's budget has resulted in there being fewer resources to provide the analysis and timely delivery of ancillary econometric surveys like the Travel Survey of Residents of Canada (TSRC) and International Travel Survey (ITS), among many others. When these surveys are released, they are often a year or more after the collection of the data which diminishes their usefulness.

Auditor General's 2014 Spring Report

In his 2014 Spring Report, the Auditor General of Canada interviewed non-government users of Statistics Canada data and found, "that Statistics Canada has not consulted them on their needs. For example, a municipal user of the Labour Force Survey informed us of their need for employment data by workplace location, but there was no ongoing mechanism to provide feedback to Statistics Canada on these needs. Without ongoing consultation with users, the Agency's data may become less relevant."⁷ The Auditor General recommended that, "In order to ensure the continued relevance of its data products, Statistics Canada should obtain, document, and analyze ongoing feedback from the full range of its data users."⁸

In response to the Auditor General's Report, the agency committed to "Starting in 2014, Statistics Canada will plan its future consultation activities to ensure that the full range of users – including those from the private sector, municipalities, and non-governmental organizations – are consulted where appropriate, and the results of these consultations are documented and analyzed."⁹

The Auditor General also recommended that there be a formal, routine process to rotate membership of advisory committees to "ensure the Agency is aware of, and responsive to, evolving needs".¹⁰ In response, Statistics Canada committed to "formalize its membership renewal process for subject matter advisory

⁴ Treasury Board Secretariat, 2012-13 Main Estimates Parts I and II The Government Expenditure Plan and Main Estimates, page II-225. Nearly all of the decrease is explained as the result of the winding down of the 2011 Census of Population and National Household Survey, as well as the ending of the major data collection period for the Census of Agriculture.

⁵ Treasury Board Secretariat, 2013-14 Main Estimates Parts I and II The Government Expenditure Plan and Main Estimates, page II-330

⁶ Treasury Board Secretariat, 2014-15 Main Estimates Parts I and II The Government Expenditure Plan and Main Estimates, page II-304

⁷ Office of the Auditor General of Canada, Spring 2014, Chapter 8 Meeting Needs for Key Statistical Data

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.

committees by January 2015 to ensure that the fullest possible range of users are represented on these committees and that the Agency is formally aware of and responsive to evolving user needs.”¹¹

Recommendations

That the federal government:

1. Continue its efforts to collect and present defensible data in a centrally-accessible, consistently formatted manner.
1. Continue working with the provinces/territories and municipalities to release data that is standardized, open formats, at little to no cost and never more than cost recovery, and without restrictions.
2. Ensure that Statistics Canada has the ability to deliver data that is timely and reliable to meet Canadian business needs.
3. Communicate the representation of private sector, municipalities and NGOs on Statistics Canada’s advisory committees, the process for membership rotation and how stakeholders can identify their interest in participating.

¹¹ Ibid.

Alignment of Federal and Provincial Liens Policies

The misalignment of federal and provincial policies regarding liens on derelict properties continues to create hardships for municipalities while slowing recovery and growth.

A lien is a legal claim on the property of another as security against the payment of a debt. Already struggling with a massive infrastructure deficit and the responsibility for funding services downloaded from the provincial and federal governments, Canadian municipalities often face the additional challenge of paying off provincial and federal liens on abandoned properties before they can be sold and redeveloped or made attractive and functional.

Because business liens are attached to a property, rather than to the owner, the municipality's sale of the property is the only recourse available to recoup unpaid taxes on derelict properties. Buildings are often left in such a state of disrepair that they are in violation of provincial building codes, and the amount of the cumulative liens can far exceed the market value of the property. With limited resources at their disposal to pay off the liens and demolish or upgrade the structures, municipalities often leave derelict buildings to further deteriorate and stand as eyesores, impeding future development around them and lowering the value of surrounding properties.

Many provinces have systems in place to allow provincial liens to eventually be waived. There are, however, no similar provisions for federal Crown liens that continue to be tied to a business property. While the federal government has agreed to remove all or part of liens on an ad hoc basis to encourage the redevelopment of contaminated sites, no formal mechanism is in place to have federal Crown liens removed from uncontaminated, derelict properties.

Liens that remain on derelict properties serve as a significant deterrent for individuals who wish to purchase the land for the purpose of redevelopment. With no process whereby properties may be completely freed of federal liens, the propensity for properties that are in a state of disrepair to continue to deteriorate and burden municipalities will surely continue.

Recommendations

That the federal government:

1. Immediately allow for the removal of federal liens against a property by establishing and maintaining lien policies that are in alignment with those of provincial/territorial governments.
2. Work collaboratively with provincial/territorial governments to establish and maintain a nationally consistent, coordinated approach to removing Crown liens and tax arrears on qualified properties.