

Liberal Party of Canada

350 Albert Street, Suite 920, Ottawa (Ontario) K1P 6M8

Parti libéral du Canada

350, rue Albert, Suite 920, Ottawa (Ontario) K1P 6M8

May 30, 2024

VIA E-MAIL

RSCommittee.Admin@assembly.ab.ca

Garth Rowswell Standing Committee on Resource Stewardship c/o Committee Clerk 3rd Floor, 9820 - 107 Street NW Edmonton, Alberta T5K 1E7

Dear Mr. Rowswell:

Re: Written Submissions for PIPA Review

I am writing in response to the request for submissions regarding the review of Alberta's *Personal Information Protection Act*, SA 2003, c.P-65 (PIPA).

As the Committee considers changes to this legislation, it is imperative to recognize the fundamental differences between federal political parties and private enterprises, as well as the unique role that political entities play in our parliamentary democracy.

Federal political parties operate with fundamentally different mandates than private enterprises. Unlike businesses that gather information to profit consumers, federal political parties act in the public interest. Their primary purpose is to communicate with the public and increase voter participation in support of parliamentary democracy. This essential role requires regulations that reflect their distinct character.

Moreover, federal political entities are essentially collections of volunteers, unlike large private enterprises or government departments with extensive resources. Privacy regulation is a highly specialized and complex area, and it will be particularly challenging for federal electoral district associations, volunteers, and smaller federal political parties to navigate these regulations in the same manner as large profit-driven corporations.

It is crucial that federal political parties not be subject to conflicting legislation from various regulators. Subjecting federal political parties to different privacy regulators in 13 different provinces/territories would create a patchwork of rules and regulations contrary to a fundamental purpose of federal elections: fair and uniform access to and communication with the Canadian electorate in every part of the country. Simplifying the regulatory landscape by designating a single regulator for federal political parties facilitates compliance and ensures a consistent and knowledgeable approach to addressing issues within the context of election law.

While the protection of personal information is of utmost importance, the regulatory framework must account for the unique nature and operational realities of federal political parties.



Jessica Cardill
Senior Director, Legal Affairs and Party Services
Liberal Party of Canada



