

# Independent Reporting Mechanism

Results Report:  
Canada 2022–2024

---

Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

## Table of Contents

Executive Summary .....	2
Section I. Key Observations.....	5
Section II. Early Results .....	9
Section III. Participation and Co-Creation .....	19
Section IV. Methodology .....	24
Annex I. Commitment Data .....	26

## Executive Summary

**Canada’s 2022–2024 National Action Plan (NAP) delivered early results, particularly across fiscal transparency and justice reform. Ninety-eight of the 106 activities were either completed or showed substantial progress in their implementation. However, the co-creation and implementation processes revealed opportunities to strengthen civil society engagement and high-level political ownership.**

### Implementation

Canada’s fifth national action plan delivered early results in three commitments.

The two commitments identified in the Action Plan Review as promising – fiscal, financial, and corporate transparency, and justice – saw the most progress.

The fiscal, financial, and corporate transparency commitment saw the enacting of legislation implementing a national, public, and searchable registry of information about beneficial owners of federal corporations. The justice commitment saw the implementation of important foundational work in promoting transparency in the Royal Canadian Mounted Police (RCMP), the country’s national police force. Meanwhile, the open data commitment saw moderate early results.

The three commitments recording progress covered distinct areas. Two commitments shared the common characteristic of building upon commitments from prior action plans. This was the fifth consecutive NAP involving a commitment focusing on making government data easier to access and use, with much weight placed upon delivering information, reports, and analyses, facilitating user engagement with data and information, and managing data standards. It was also the third NAP that included a commitment on fiscal, financial, and corporate transparency. The progress it recorded in the current NAP marked the culmination of work carried out in the 2016–2018 and 2018–2021 action plans, combined with domestic and international political pressure and the political will to enact change. Under the justice theme, police reform was the most notable element with foundational progress also resulting from domestic political pressure and political will.

Eighty-three of the action plan’s 106 activities were completed.<sup>1</sup> This level of progress parallels that which was achieved for Canada’s third (2016–2018)<sup>2</sup> and fourth (2018–2021)<sup>3</sup> NAPs. However, as with previous action plans, there remained a tendency to equate the implementation of activities with the achievement of intended outcomes.

### At a Glance

#### LEVEL OF COMPLETION

**5/5**

**Complete or substantially complete commitments**

#### EARLY RESULTS

**3/5**

**Commitments with early results**

**1/5**

**Commitments with significant results**

#### KEY OBSERVATIONS

- Implementing commitment activities is not synonymous with achieving open government outcomes.
- Civil society champions open government, not just OGP national action plans.
- The perceived role and functions of Canada’s Multi-Stakeholder Forum on Open Government is shifting toward a broader, more strategic function.
- Delivering on ambitious commitments requires sustained societal demands and political will for change.
- Absence of earmarked resources nurtures the advancing of safe, unambitious, low risk commitments.

**Met the minimum requirements during implementation: Yes**

## Participation and Co-Creation

Prior to September 2023, responsibility for overseeing and implementing Canada’s OGP action plans fell under the remit of the Open Government Team of the Treasury Board of Canada Secretariat (TBS), with individual federal departments and agencies being responsible for delivering on the commitments and milestones. As part of an intra-departmental restructuring in the third and fourth quarters of 2023, the Open Government Team was merged with the Access to Information Policy and Performance Division (AIPPD) of the TBS.

In line with public health guidelines in force at the time, the co-creation process took place entirely through online channels between July 2021 and February 2022. The agenda for the fifth NAP was developed with limited iterative dialogue with non-government actors. During the co-creation phase, this dialogue took the form of online public consultations and requests for feedback.<sup>4</sup> Although the MSF was kept up to date about the implementation of commitments and provided opportunities to offer feedback, neither its civil society members nor members of the public were directly implicated in their implementation.<sup>5</sup>

The most notable result arising from the fifth NAP emerged in parallel with, rather than because of, its implementation. Specifically, civil society members of the MSF actively and purposefully turned their foremost attention away from matters of action plan implementation and administration, directing their efforts instead at drawing upon open government tools offered by the Organization for Economic Co-operation and Development (OECD) to advance principles they identified as necessary for ensuring the implementation of open government strategies at home that affect meaningful progress.<sup>6</sup> These efforts, which included publishing a policy brief titled “Success Factors For Open Government Strategies in Canada,”<sup>7</sup> were driven in response to the findings of an internal 2021 evaluation carried out the TBS Internal Audit and Evaluation Bureau which pointed the “need for a strong vision of open government in the Government of Canada,”<sup>8</sup> and by OECD recommendations calling for Canada to develop “a holistic federal open government strategy.”<sup>9</sup>

There was a consensus among civil society MSF members that they: (i) did not view focusing narrowly on implementing action plan commitments as particularly important to affecting meaningful open government progress in Canada; (ii) lacked sufficient knowledge about individual commitments and their intended beneficiaries to meaningfully contribute to their implementation; and (iii) did not possess the requisite skills and competencies to monitor and engage with implementing action plan commitments outside of their areas of expertise. The relative detachment of civil society members from a narrow focus on action plan commitments is similar to the experiences with previous NAPs but with one notable difference. Previously, civil society members of the MSF identified the lack of time and resources, combined with the need to start working on preparations for the next NAP, as a primary reason for their relative lack of focus on commitment implementation. Over the lifetime of the 2022–2024 NAP, civil society members viewed the implementation of action plan commitments and activities as a constituent element of advancing open government in Canada but not as *the* driving factor in realizing open government.<sup>10</sup>

## Implementation in Context

Several factors hindered the implementation of Canada’s fifth NAP. The first was the global Covid-19 pandemic which reportedly delayed the start of certain commitment activities. Second, in the wake of the pandemic, budgetary constraints were imposed by the federal government in the third and fourth quarters of 2023. Among other things, these financial restrictions limited the participation of Canadian representatives in regional and international open government meetings,<sup>11</sup> and were tied to structural changes in government including a discontinuity in the persons holding ministerial and other senior positions. The third was the limited visibility of senior government members championing open government.<sup>12</sup> This has led some civil society and government MSF members to question the level of priority OGP holds for the Government of Canada.<sup>13</sup>

<sup>1</sup> “Search National Action Plan on Open Government Tracker,” Government of Canada, accessed March 2025, <https://search.open.canada.ca/nap5>.

<sup>2</sup> Michael Karanicolas, “IRM End-of-Term Report: Canada 2016-2018,” Open Government Partnership, March 2019, [https://www.opengovpartnership.org/wp-content/uploads/2019/03/Canada\\_End-Term\\_Report\\_2016-2018\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/03/Canada_End-Term_Report_2016-2018_EN.pdf).

---

<sup>3</sup> Daniel J. Paré, “IRM Transitional Results Report: Canada 2018–2021,” Open Government Partnership, 1 May 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/05/Canada\\_Transitional-Results-Report\\_2018-2021\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/05/Canada_Transitional-Results-Report_2018-2021_EN.pdf).

<sup>4</sup> “What We Heard Report,” Government of Canada, 11 January 2024, <https://open.canada.ca/en/content/what-we-heard-report>; “Consultation Data for Canada’s 2022–24 National Action Plan (NAP) on Open Government,” Government of Canada, accessed March 2025, <https://open.canada.ca/data/en/dataset/35fa8dc5-e9c5-4434-8e29-967ee9b90618>.

<sup>5</sup> Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025.

<sup>6</sup> Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025.

<sup>7</sup> Civil Society Members of Canada’s Multi-Stakeholder Forum on Open Government, “Success factors for open government strategies in Canada – A policy brief,” Morris J. Wosk Centre for Dialogue, 10 March 2025, <https://www.sfu.ca/content/dam/sfu/dialogue/ImagesAndFiles/KnowledgePractice/StrengtheningCanadianDemocracy/SuccessFactorsforOpenGovernment-20250314.pdf>.

<sup>8</sup> Internal Audit and Evaluation Bureau, “Evaluation of the Open Government Program,” Treasury Board of Canada Secretariat, 7 June 2021, <https://www.canada.ca/en/treasury-board-secretariat/corporate/reports/evaluation-open-government-program.html>.

<sup>9</sup> “Open Government Scan of Canada: Designing and implementing an open government strategy,” Organization for Economic Co-operation and Development, 27 February 2023, [https://www.oecd.org/en/publications/open-government-scan-of-canada\\_1290a7ef-en/full-report/component-3.html#section-d1e124-0d7fc61da4](https://www.oecd.org/en/publications/open-government-scan-of-canada_1290a7ef-en/full-report/component-3.html#section-d1e124-0d7fc61da4).

<sup>10</sup> Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025.

<sup>11</sup> For example, no Government of Canada representatives attended OGP’s *América Abierta* (Open Americas) meeting in Brasilia, Brazil (December 2024) or the OECD Open Government Working Party meeting in Seoul, Republic of Korea (September 2024). Government representatives did attend the OGP Global Summit in Tallinn, Estonia (September 2023), the 9<sup>th</sup> Meeting of OECD Expert Group on Open Government Data, and the 10<sup>th</sup> Meeting of the Expert Group on Open Government Data in Paris, France (October 2024).

<sup>12</sup> Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025.

<sup>13</sup> Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025.

## Section I. Key Observations

The key observations below offer reflections from Canada’s fifth national action plan cycle. These lessons aim to support Canada’s future action plans and broader open government journey.

### **Observation 1: Implementing commitment activities is not synonymous with achieving open government outcomes.**

The absence of benchmarks against which to assess claimed outcomes is a long-standing concern with Canada’s OGP national action plans.<sup>1</sup> In contravention of Goodhart’s law, targeted activities are all too often presented as indicators of success. For example, Milestone 1.1 of Commitment 1 relating to making climate change information easier to find and understand relies solely on the release of information without benchmarks against which to measure whether these outcomes have been achieved or by whom. Likewise, Commitment 2 and its milestones include 36 success indicators aimed at combatting disinformation, safeguarding fair elections, fostering social inclusion and trust toward public institutions, and protecting on- and off-line civic spaces. These ‘indicators’ are, in fact, simply activities to be completed. They offer no basis upon which to assess whether intended outcomes have or are being realized. These, along with other examples in the action plan, highlight the need for a clearer theory of change and more meaningful metrics to monitor and evaluate results. The benefits of developing baseline indicators for measuring open government changes were also highlighted in the OECD’s *Open Government Scan of Canada*.<sup>2</sup> Relatedly, Canada’s Open Government Tracker is a useful tool for monitoring progress of commitment activities. However, it only reports on implementation progress, not results flowing from implementation. Moving forward, to better report on outcomes generated by commitment implementation, the government could incorporate a results tracking feature in the Open Government Tracker. Doing so would require establishing a clear theory of change and benchmarks against which to measure change, and could, for example, take the form of biannual reporting of post-completion outcomes of activities for a set period. This would have the added advantage of allowing for better recognition of commitment results whose outcomes may not be realised within the two- or four-year OGP cycle, as well as contributing to improving practices and policies, and enhancing the enabling environment for building trust between citizens and the government.

### **Observation 2: Civil society champions open government, not just OGP national action plans.**

During this action plan cycle, civil society MSF members actively and purposefully turned their attention away from matters of commitment implementation;<sup>3</sup> directing their energies instead to influencing a broader agenda of open government in Canada. The objective was to implicate the MSF in accountability, participation, and transparency activities across government beyond just NAP-related activities.<sup>4</sup> Government members of the MSF have been supportive of this new direction and sought to assist their civil society counterparts by arranging meetings with senior government managers and leaders and offering guidance on how best to engage with individuals in senior leadership positions. This support included, among other things, arranging a meeting in the second quarter of 2024 with then-President of the TBS Anita Anand. Based on this shifting perspective about the role and function of the MSF, civil society members drew upon OECD-based tools to develop and advance seven principles they identified as necessary for ensuring open government strategies affect meaningful progress.<sup>5</sup> This document was initially submitted to the government with the hope of informing the content of its then-developing Trust and Transparency Strategy and has since been re-positioned as advice to the government for implementing this strategy.<sup>6</sup> Most recently, the objective is now for it to serve as a basis for facilitating more regular engagement between the MSF and the new TBS President, embedding the seven principles into the forthcoming NAP, and directly implicating the MSF in co-developing a vision and shared reference point of what success looks like moving forward. To facilitate the whole-of-government change envisaged in the Trust and Transparency strategy, the government could increase the frequency of existing dialogues between the MSF and lead OGP commitment implementers, as well as other senior government leaders.

**Observation 3: The perceived role and functions of Canada’s Multi-Stakeholder Forum on Open Government is shifting toward a broader, more strategic function.**

The perceived role and functions of the MSF changed throughout the implementation of the current NAP, in part because civil society members viewed OGP action plans as limited drivers of broader government transparency, accountability, and participation. In addition, some members felt they lack the knowledge to fully engage with commitments outside of their domain of expertise.<sup>7</sup> At the same time, some government departments and agencies established (and in some cases already had in place) advisory bodies similar to the MSF to conduct consultative activities in relation to undertakings that were not in any way linked to the 2022-2024 NAP. For example, Public Safety Canada has its National Security Transparency Advisory Group (NS-TAG) comprised of government, civil society actors, and academics mandated to advise on increasing democratic transparency and accountability, internally and externally, among Canada’s national security policies, programs, and activities. Another body established wholly outside the purview of the action plan was the Government of Canada Security and Intelligence Open Government Working Group (GC SIOGWG). Established in the second quarter of 2022, it focuses on strategies for increasing open government activities in departments that traditionally struggle with transparency (e.g., policing, security).<sup>8</sup> These developments, combined with the 2023 report received by the TBS about differences spanning OGP MSFs,<sup>9</sup> helped envision different ways of organizing the forum. One vision that seems to be gaining traction is the notion of implementing a federated structure comprising a core or national MSF body mandated to play an expanded role in promoting accountability, participation, and transparency across government beyond only OGP activities, and separate bodies or working groups with subject-specific mandates relating to OGP and non-OGP activities reporting to the core/national body and vice versa. These working groups would be comprised of civil society and government stakeholders with relevant knowledge about specific issue areas and their intended beneficiaries. Some of these entities might, for example, be organised around specific OGP commitment areas and could work with the lead implementers.<sup>10</sup> Others, as currently is the case, would be involved in open government related activities occurring outside the purview of OGP action plans. Going forward, the government could, in collaboration with civil society actors, examine different MSF models in more detail to assess the feasibility of a federated or ‘spoke-and-hub’ model.

**Observation 4: Delivering on ambitious commitments requires sustained societal demands and political will for change.**

The realised and expected benefits of elevating open government initiatives through support from senior levels of government were evident in the enactment of legislation mandating the creation of a publicly accessible and searchable beneficial ownership registry for federal corporations two years ahead of schedule, and in the foundational steps toward greater openness taken within the RCMP.<sup>11</sup> Canada’s Open Government Team is composed of dedicated and capable individuals, though change across the government requires high-level authority and support. Just as the presence of political will can raise the profile of ambitious open government initiatives and guide them to completion, so too its absence can hinder progress. In the absence of individuals with authority to champion implementing open government initiatives and strategies, and/or specific NAP commitments, those working to co-create and implement both Canada’s OGP national action plans and whole-of-government change risk finding themselves trapped in cycles of working on initiatives that, from the start, risk being set to underperform. Looking forward, and in line with OECD recommendations linking the implementation of an open government strategy with ministerial mandate letters,<sup>12</sup> the government may wish to consider how cabinet-level championing of open government could catalyse moving forward with accountability, participation, and transparency-oriented reforms across government and within the RCMP.

**Observation 5: Absence of earmarked resources nurtures the advancing of safe, unambitious, low risk commitments.**

The contents of Canada’s NAPs are created in accord with existing federal budget funding allocations. In the absence of earmarked funding, government departments are forced to either craft their commitments in an overly vague manner to account for, or to develop the action plan commitments based on, areas for which they have already secured funding. This is not new. Lack of dedicated funding for action plan commitments has been a consistent challenge in Canada’s

OGP process, as highlighted in previous IRM reports and by civil society MSF members.<sup>13</sup> The need to allocate financial and other resources is also highlighted in the OECD’s *Open Government Scan of Canada*.<sup>14</sup> Under-resourcing remained a challenge during this action plan cycle precisely because there continues to be no budget allocations specific to implementing OGP action plan commitments. Evidence of this is recorded in the MSF meeting minutes, including from the 2021 discussions of themes and activities to be incorporated into the fifth NAP through the 2024 MSF meeting minutes discussing the upcoming sixth NAP. The result, as was evidenced in the activities associated with Commitments 1, 2, and 5, is the adoption of ‘safe’ initiatives that present little to no drain on investment. Going forward, the government may consider working toward striking a balance between its ongoing fiscal constraints and the OECD’s recognition of the need for it to invest in open government resources.

<sup>1</sup> See Mary Francoli, “IRM Progress Report: Canada 2012–2013,” Open Government Partnership, 23 October 2015, [https://www.opengovpartnership.org/wp-content/uploads/2019/07/Canada\\_final\\_2012\\_Eng.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/07/Canada_final_2012_Eng.pdf); Mary Francoli, “IRM Progress Report: Canada 2014–2015,” Open Government Partnership, 1 September 2016, [https://www.opengovpartnership.org/wp-content/uploads/2017/05/1.Canada14-15\\_English\\_Final\\_0\\_0.pdf](https://www.opengovpartnership.org/wp-content/uploads/2017/05/1.Canada14-15_English_Final_0_0.pdf); Mary Francoli, “IRM End-of-Term Report: Canada 2014–2016,” Open Government Partnership, 25 May 2017, [https://www.opengovpartnership.org/wp-content/uploads/2017/05/Canada\\_EOTR\\_2014-2016\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2017/05/Canada_EOTR_2014-2016_EN.pdf); Michael Karanicolas, “IRM Mid-Term Report: Canada 2016–2018,” Open Government Partnership, 24 April 2018, <https://www.opengovpartnership.org/documents/canada-mid-term-report-2016-2018>; Michael Karanicolas, “IRM End-of-Term Report: Canada 2016–2018,” Open Government Partnership, March 2019, [https://www.opengovpartnership.org/wp-content/uploads/2019/03/Canada\\_End-Term\\_Report\\_2016-2018\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/03/Canada_End-Term_Report_2016-2018_EN.pdf); Daniel J. Paré, “IRM Design Report: Canada 2018–2020,” Open Government Partnership, 6 July 2021, [https://www.opengovpartnership.org/wp-content/uploads/2021/07/Canada\\_Design\\_Report\\_2018-2020\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2021/07/Canada_Design_Report_2018-2020_EN.pdf); Daniel J. Paré, “IRM Transitional Results Report: Canada 2018–2021,” Open Government Partnership, 1 May 2025, [https://www.opengovpartnership.org/wp-content/uploads/2024/05/Canada\\_Transitional-Results-Report\\_2018-2021\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/05/Canada_Transitional-Results-Report_2018-2021_EN.pdf); Daniel J. Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership, 7 June 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/06/Canada\\_Action-Plan-Review\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/06/Canada_Action-Plan-Review_2022-2024_EN.pdf).

<sup>2</sup> “Open Government Scan of Canada: Designing and implementing an open government strategy,” Organization for Economic Co-operation and Development, 27 February 2023, [https://www.oecd.org/en/publications/open-government-scan-of-canada\\_1290a7ef-en/full-report/component-3.html#section-d1e124-0d7fc61da4](https://www.oecd.org/en/publications/open-government-scan-of-canada_1290a7ef-en/full-report/component-3.html#section-d1e124-0d7fc61da4).

<sup>3</sup> Representatives of civil society, correspondence with IRM researcher, March 2025.

<sup>4</sup> Civil Society Members of Canada’s Multi-Stakeholder Forum on Open Government, “Success factors for open government strategies in Canada – A policy brief,” Morris J. Wosk Centre for Dialogue, 10 March 2025, <https://www.sfu.ca/content/dam/sfu/dialogue/ImagesAndFiles/KnowledgePractice/StrengtheningCanadianDemocracy/SuccessFactorsforOpenGovernment-20250314.pdf>.

<sup>5</sup> The seven factors are: (1) Prioritize all three pillars of open government (participation, accountability, and transparency) with equity and inclusion as cross-cutting principles; (2) Elevate open government programs under senior leadership positions to enable whole-of-government influence (e.g., the Government of Canada could create the post of Chief Open Government Officer, which would be a first among OECD countries); (3) Hold departments, units, and agencies accountable for delivering on open government, for instance, by encoding standards in policy and developing maturity models for learning and evaluation in participation, accountability, and transparency; (4) Use open government to create a coordinated response for democratic resilience across Canada and to reduce fragmentation, both among government departments and agencies and between different levels of government; (5) Invest resources in open government, recognizing both the strong economic business case, as well as the possibility for increased trust in government via meaningful citizen engagement and increased value-for-money through better designed services; (6) Accelerate capacity building and culture change in government by providing recognition to institutional leaders, building upon existing good practices and creating spaces for learning and collaboration; and (7) Grow a community of open government champions across Canada, including civil society organizations, businesses, and all levels of government. See Civil Society Members of Canada’s Multi-Stakeholder Forum on Open Government, “Success factors for open government strategies in Canada – A policy brief,” Morris J. Wosk Centre for Dialogue.

<sup>6</sup> Representatives of civil society, correspondence with IRM researcher, May 2025.

<sup>7</sup> Representatives of civil society, correspondence, with IRM researcher, March 2025.

<sup>8</sup> The meeting agendas and records of decision for this working group are not publicly available. However, a sample of them was shared with the IRM researcher.

<sup>9</sup> Mary Francoli, “Multi-Stakeholder Forum on Open Government - MSF on Open Government Across the Open Government Partnership Lessons and Recommendations for Canada,” Government of Canada, 10 July 2023, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/98a0fddf-8ad5-4248-b7f5-ff5e59691844>.

<sup>10</sup> Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025.

<sup>11</sup> In addition to the completion of RCMP-related NAP activities, further evidence of tentative steps toward openness can be seen in the use of the term ‘transparency’ in leadership responses to questions about the RCMP and its future, along with seeming changes in internal narratives. See Michael Tutton and Keith Doucette, “We need to be more transparent”: RCMP Commissioner Lucki says police must modernize,” City News, 23 August 2022, <https://toronto.citynews.ca/2022/08/23/we-need-to-be-more-transparent-rcmp-commissioner-lucki-says-police-must-modernize/>; “Evidence Number 105,” Standing Committee on Access to Information, Privacy, and Ethics, 27 February 2024, <https://www.ourcommons.ca/Content/Committee/441/ETHI/Evidence/EV12928755/ETHIEV105-E.PDF>.

<sup>12</sup> “Open Government Scan of Canada: Designing and implementing an open government strategy,” Organization for Economic Co-operation and Development.

<sup>13</sup> Paré, “IRM Design Report: Canada 2018–2020,” Open Government Partnership, p. 30; Michael Karanicolas, “IRM Progress Report: Canada 2016–2017,” Open Government Partnership, 24 April 2018,

<https://www.opengovpartnership.org/documents/canada-mid-term-report-2016-2018>; Civil Society Members of Canada’s Multi-Stakeholder Forum on Open Government, “MSF Letter from civil society to government members,” Google Drive, 12 March 2018.

<sup>14</sup> “Open Government Scan of Canada: Designing and implementing an open government strategy,” Organization for Economic Co-operation and Development.

## Section II. Early Results

This section analyses commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

### Table 1. Commitments with Early Results

**Commitment 3:** This commitment contributed to the enacting of legislation implementing a public, searchable registry of information about beneficial owners of federal corporations.

**Commitment 4:** This commitment contributed to introducing important foundational work in promoting transparency in Canada's Royal Canadian Mountain Police.

### Commitment 3: Fiscal, financial and corporate transparency

**Implementers:** Innovation, Science and Economic Development (ISED), Department of Finance Canada (FIN), Treasury Board of Canada Secretariat (TBS).

#### Context and Objectives

The Basel Anti-Money Laundering (AML) Index suggests that the potential for money laundering, terrorist financing, and other financial crimes in Canada fluctuated modestly between 2016 and 2024.<sup>1</sup> Many domestic and international civil society interests, including Publish What You Pay Canada, Open Ownership, Transparency International Canada, End Snow-Washing Coalition, and Canadians for Tax Fairness have long advocated for the creation of a national beneficial ownership registry.<sup>2</sup>

In Canada, businesses can incorporate federally, which allows countrywide operation, or provincially/territorially, which limits activity to specific provinces or territories.<sup>3</sup> Registry data is managed independently by each province or territory.<sup>4</sup> The federal government has no jurisdiction over how provincial and territorial registries are administered, the data they collect and publish, and how this information is made available.<sup>5</sup> Efforts to encourage the federal government to create a publicly accessible and searchable beneficial ownership registry have been ongoing since at least 2016; involving advocacy from domestic and international civil society actors, international organizations, and other governments.<sup>6</sup> Progress has been delayed by institutional resistance, timing mismatches between OGP cycles and policy processes, and disagreements over the cost-benefit of prioritizing the creation of registries over other public investment priorities. Additional concerns include the perceived value for law enforcement, compliance costs for businesses, and potential privacy risks.<sup>7</sup>

Canada began linking select federal and provincial business registries as a pilot exercise in its third NAP (2016–2018)<sup>8</sup> and committed to making legislative changes in its fourth NAP (2018–2020) requiring federal corporations to maintain accurate and up to date ownership information, and to working with provinces and territories to improve access and coordination under the Agreement to Strengthen Beneficial Ownership Transparency.<sup>9</sup> Building on these efforts, Commitment 3 aimed to establish a publicly accessible beneficial ownership registry, and to promote coordinated implementation and a harmonized approach across jurisdictions.<sup>10</sup> This continued Canada's alignment with international efforts to combat financial crimes.<sup>11</sup>

#### Early Results: Significant

Commitment 3 is assessed as having significant results for its contribution to the enactment of legislation creating a publicly accessible and searchable beneficial ownership registry of federal corporations, which went live on 22 January 2024. One of its key implementation challenges to date, relates to populating the registry database with information about individuals with significant control (ISC).<sup>12</sup> This process is expected to extend into late 2025 because it depends upon businesses filing their annual returns over the course of 2024 and 2025.<sup>13</sup> At the time of writing, the registry is live and searchable, with complete beneficial ownership information available for

some federal corporations.<sup>14</sup> The registry includes a link to the Canada Business Registries database which contains information for corporations registered in seven provinces.<sup>15</sup>

The commitment's three milestones, divided into seven activities, were completed.<sup>16</sup> Milestone 1 included collecting stakeholders' views about specifications for a made-in-Canada solution (Activity 1), passing relevant legislation (Activity 2) and creating the beneficial ownership registry (Activity 3); all of which were expected to be completed by the end of 2023.<sup>17</sup> It is currently still too early to identify any impacts—early or otherwise—emerging from the implementation of the registry, not least because its database is still being populated<sup>18</sup> with ISC information.<sup>19</sup> Additionally, the registry is only for federal corporations, and these entities comprise less than 20% of all companies registered in Canada.<sup>20</sup> At present, Quebec is the only province collecting beneficial ownership information,<sup>21</sup> with British Columbia planning to start doing so in 2025.<sup>22</sup> The government of Ontario has announced its intention to launch a public consultation in 2025 aimed at informing the creation of a beneficial ownership registry.<sup>23</sup> As of December 2023, these three jurisdictions accounted for approximately 75% of Canadian corporations.<sup>24</sup> Until there is pan-Canadian access to beneficial ownership information, the success of efforts to prevent the misuse of corporate structures is likely to remain constrained despite current improvements.

Commitment 3 also included a milestone to engage federal, provincial, and territorial partners to support coordinated implementation and a harmonised approach to beneficial ownership and another to monitor the strategic management of technology and software procurement within the federal government.<sup>25</sup> According to Canada's Open Government Tracker, both were completed.<sup>26</sup> In accord with Milestone 3.2, the federal Minister of Finance and their provincial counterparts continue to work together under the auspices of the Agreement to Strengthen Beneficial Ownership Transparency<sup>27</sup> to discuss implementing a pan-Canadian solution to beneficial ownership transparency nationwide, whereas Bill C-42 which contained statutory provisions enabling the scalability of the federal registry received Royal Assent in November 2023.<sup>28</sup> The completion of Milestone 3.3 was marked by the first set of data of the Application Portfolio Management (APM) system used by 43 departments being made publicly available in December 2024.<sup>29</sup> However, the lack of specific benchmarks against which to gauge change makes assessment of results emanating from the completion of these two milestones challenging.<sup>30</sup>

The open government lens for Commitment 3 was transparency insofar as the implementation of Milestone 3.1, along with the necessary intergovernmental dialogue specified in Milestone 3.2, aimed at augmenting fiscal and corporate transparency for federally incorporated private companies. In terms of the design of the registry, civil society voices and those of other stakeholders were received through public consultations that took place in 2021.<sup>31</sup> These views, along with MSF activities dating back to 2018 informed the registry design features. Although the MSF was kept up to date about the implementation of registry and provided opportunities to offer feedback during this action plan cycle, neither its civil society members nor members of the public were directly implicated in its implementation.

The Executive Director of Transparency International Canada welcomed the registry's launch, describing it as a notable step toward ending financial secrecy practices that have contributed to money laundering in the country. However, they emphasised the need for further harmonization across jurisdictions, urging provinces and territories to align with the federal initiative to prevent any region from becoming a haven for secrecy.<sup>32</sup> Similarly, the Campaign Director of the Beneficial Ownership Project at IMPACT described the registry as a valuable instrument that could contribute to strengthening the integrity of Canada's national economy.<sup>33</sup>

The public information, including the name and address of a growing number of federal corporations with individuals of significant control, is available online, free of charge through a search of the federal registry.<sup>34</sup> Innovation, Science and Economic Development Canada (ISED), the lead department for the beneficial ownership registry, has entered into information sharing agreements with investigative bodies who have been statutorily granted access to the non-public beneficial ownership information. These bodies include the RCMP, the Canada Revenue Agency (CRA), and the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC). It is these investigative bodies who are responsible for identifying and taking action to reduce money laundering, terrorist financing, and other financial crimes in Canada.

At this early stage of implementation, it is unclear if the departments leading this commitment are collecting information to monitor the frequency of registry usage by civil society actors and whether the enhanced beneficial ownership transparency it offers is contributing to the identification of—or reductions in—money laundering, terrorist financing, and other financial crimes in Canada. When asked, both civil society and government members of the MSF indicated they assumed such information was being collected but could not confirm if this was indeed the case.<sup>35</sup> One government representative added that if such information was being collected, it was not yet made public.<sup>36</sup>

## Looking Ahead

Realizing the anticipated results of enhanced beneficial ownership transparency will hinge upon the effectiveness of the new legislation and its enforcement in balancing the long-standing tensions between the benefits of full public access to beneficial ownership information and concerns about the privacy, security, and investment implications of such access.<sup>37</sup> Efforts to strike the right balance for each of these issues remain in play.

In March 2025, the federal government released amendments<sup>38</sup> to the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act, 2000*. This expanded the scope of companies and sectors subject to anti-money laundering and counter-terrorist financing obligations.<sup>39</sup> As of 1 October 2025, Canadian reporting entities<sup>40</sup> will be required, within 30 days, to report material discrepancies between their own records and information contained in the beneficial ownership registry. Contingent upon businesses first developing a code of practice for specifying the conditions for disclosing personal information that must be approved by Privacy Canada, entities subject to the Act will be able to share information with one another to identify and prevent money laundering, sanctions evasion, and terrorist financing.<sup>41</sup> The approach combines an emphasis on discrepancy reporting and integrating the beneficial ownership registry with the co-creating of privacy-disclosure practices albeit excluding civil society participation.<sup>42</sup>

After three OGP action plan cycles and with a publicly accessible and searchable registry now in place, the priority previously given to enhancing beneficial ownership transparency appears to be somewhat waning among civil society and government members of the MSF.<sup>43</sup> Based on the work completed to date in relation to Canada's upcoming sixth OGP national action plan, and considering factors such as the reluctance of federal government and agencies to publicly advance ideas for open government commitments ahead of the April 2025 federal election,<sup>44</sup> ongoing reductions in government operational spending, and the TBS Open Government Team's request to extend the co-development process into early 2026 to facilitate its launch,<sup>45</sup> it remains unclear whether any additional beneficial ownership initiatives will be included.

Given the above assessment, IESD, FIN, and the TBS could consider the following moving forward:

- **Conducting on-going internal monitoring and evaluation** to track the extent to which public (i.e., civil society) oversight and reporting is contributing to reductions in financial crimes. This monitoring could draw on a combination of the recommendations and indicators to be used by the Financial Action Task Force (FATF) in its 2025 evaluation of Canada's framework and systems for combatting money laundering and other financial crimes<sup>46</sup>, as well as the 17 indicators used by the Basel AML Index to assess a country's vulnerability to money laundering and other crimes.<sup>47</sup> Such internal tracking would enable a clearer understanding of whether mechanisms like the publicly accessible and searchable beneficial ownership registry are resulting in measurable reductions in money laundering, corruption, terrorist financing, tax evasion, and other financial crimes
- Ensure that the **monitoring and evaluation results are publicly available** in an easily accessible format.
- **Continue engaging with provincial and territorial counterparts** to support pan-Canadian access to beneficial ownership information and expanding this work to include direct partnership with civil society actors. This partnership could include creating a dedicated body akin to the MSF mandated to oversee both efforts at harmonizing beneficial ownership efforts across federal, provincial, and territorial jurisdictions, as well as Canada's framework and systems for combatting money laundering and other financial crimes more

broadly. Such partnerships would offer an additional channel to further enhance the enabling environment for building trust between citizens and the state.

- **Leverage the Open Gov Challenge** as a strategic mechanism to advance and coordinate beneficial ownership transparency reform.<sup>48</sup> This could help sustain momentum and promote consistent implementation at both national and provincial levels.
- **Use OGP’s peer leaning mandate** to continue conversations with OGP members with live beneficial ownership registries, along with international partners and civil society actors, about successes, ongoing technological and capacity-building challenges, and strategies for advancing and sustaining ambitious beneficial ownership transparency reforms.

## Commitment 4: Justice

**Implementers:** Justice Canada, Royal Canadian Mounted Police (RCMP), International Development Research Centre (IDRC).<sup>49</sup>

### Context and Objectives

Commitment 4 marked an effort to bring openness to an issue area not addressed in previous NAPs. It sought to advance access to information relating to justice, improve legal literacy through the collection and dissemination of justice data and best practices, as well as foster collaboration to advance access to justice. The commitment’s most notable feature was the introduction of open government strategies within the Royal Canadian Mounted Police (RCMP), an organization long known for its closed policing culture and aversion to transparency.

The commitment’s timing and origins coincided with broader societal calls for social justice such as the Black Lives Matter and #MeToo movements of the early 2020s in North America and elsewhere. Its standout element—reforming the RCMP—was the product of long-standing societal demands for reforming the national police force and the federal government’s receptiveness to moving forward with transparency-centred reforms.<sup>50</sup>

The principal enabling factor driving the commitment’s implementation was the timing and findings of the Mass Casualty Commission (2020–2023) which was tasked with investigating the RCMP’s response to a 2020 mass killing that took place in rural Nova Scotia.<sup>51</sup> Established in October 2020, the Commission held public hearings and roundtables throughout 2022 and released its final report in March 2023. Over half of the Commission’s 130 recommendations focused on matters related to the RCMP’s policing culture, including improving accountability mechanisms.<sup>52</sup> Among other things, it found that advice from previous public inquiries into RCMP conduct had not been implemented. Although none of the Commission’s final recommendations are directly reflected in Milestone 4.5, the activities it specifies directly resonate with the Commission’s call for reforming the RCMP’s organizational and policing cultures.

### Early Results: Moderate

The commitment consisted of five milestones divided into 22 activities. Twenty of the 22 activities have been completed. It is assessed as having moderate early results because its standout element, which involved introducing open government reforms within the RCMP (Milestone 4.5), contributed to the publication of the RCMP’s Transparency and Trust Strategy and Action Plan,<sup>53</sup> the creation of an RCMP Open Government Office staffed by three individuals<sup>54</sup> albeit with limited resources to advance openness and transparency across the police force,<sup>55</sup> and the establishment of an RCMP Open Government Working Group comprised of staff from multiple RCMP divisions.<sup>56</sup> A planned open government multi-stakeholder forum comprised of representatives from civil society organizations, other government departments, academia, and community representatives has been delayed.<sup>57</sup> Overall, three of Milestone 4.5’s four activities were completed.

The Transparency and Trust Strategy is an outgrowth of an initiative set out in the RCMP’s 2021 Vision 150 and Beyond modernization plan, which proposed creating and launching an open government section within the force.<sup>58</sup> Released in May 2023, it is structured around a three year action plan consisting of 29 initiatives organized into five pillars (i.e., governance, participation, people/culture, technology, and transparent policing). Both the strategy and the action plan were developed without any direct input from civil society actors but were shared with the MSF for feedback.<sup>59</sup> The RCMP Open Government Office was responsible for tracking and reporting on

Milestone 4.5 and Success Indicator 4.1.5.1. To date, its activities have mainly focused on working with the RCMP's internal communication team to foster greater awareness within the force about open government and to promote its capacity to collaborate with interested entities internally. One such area of collaboration has been the Open Government Office's work with the RCMP's anti-racism unit to analyse datasets prioritised for release and to develop potential policies on police reform.<sup>60</sup> The Open Government Working Group was initially launched in May 2022 and then renamed the Enterprise Transparency Working Group in 2024 with the mandate to strengthen internal collaboration and communication about open government/transparency initiatives. The group's terms of reference do not permit civil society representation, as it is intended solely for internal collaboration. Civil society participation is instead envisioned as a function of the planned multi-stakeholder forum.

In its Transparency and Trust Strategy Year-In-Review 2024 self-assessment,<sup>61</sup> the RCMP reported progress on open government efforts, including launching a data release framework,<sup>62</sup> complying with the Privy Council Office's (PCO) Open Government Registry requirements, holding multiple open government training sessions, piloting an online consultation platform, and publishing a dataset with the Canadian Anti-Fraud Centre.<sup>63</sup> It also highlighted ongoing challenges, such as the need to expand its Open Government Office and establish a multi-stakeholder forum, shift internal culture toward greater transparency, and improve data sharing and policy frameworks. The IRM researcher could not confirm whether these reported advancements or challenges had been independently validated by an external third party.

According to the Ending Violence Association of Canada, the force's continued failure to make public information, such as the internal reviews of some 30,000 sexual assault investigations, stands in stark contrast to the pillars and actions set out in the Transparency and Trust Strategy.<sup>64</sup> This said, it merits noting the RCMP operates under legislative and privacy constraints (e.g., *DNA Identification Act, 1998*), limiting, at times, how open it can be with certain information. More recently, the British Columbia Civil Liberties Association (BCCLA) called into question ambiguities in the RCMP's plan for a multi-stakeholder forum; highlighting the unclear roles of co-chairs, concerns about the failure to specify membership numbers, and insufficient support for non-government members.<sup>65</sup>

Commitment 4 also included milestones around the collection and dissemination of justice data, identification and sharing of promising justice practices, and advancing legal literacy and access to justice through collaborations with provincial and territorial partners (Milestones 1, 2, 3 and 4). The information reported in Open Government Tracker suggests many activities among these milestones had been started or completed prior to the launch of the action plan. The lack of specific benchmarks or performance indicators against which to gauge change makes assessment of results and progress challenging.

The open government lens for Milestone 4.5 on developing a multi-year roadmap for open government at the RCMP and Activity 4.1.5.1 on establishing and releasing RCMP inventory of business value data and information touched on the OGP values of transparency and civic participation.

The commitment contributed to making positive, albeit tentative, inroads toward rendering the RCMP's practices and policies more transparent and to enhancing trust building between citizens and the force. According to one government member of the MSF, putting open government foundations in the form of an office with dedicated staff in place at the RCMP has been a "big win."<sup>66</sup> Another government member of the MSF echoed this view; highlighting the RCMP's efforts as a strong example of nascent transparency in an unexpected area, suggesting that public expectations for openness now apply across all government programs. They emphasised that if transparency works for the RCMP, it can be effective elsewhere as well.<sup>67</sup> From November 4<sup>th</sup> to 22<sup>nd</sup> 2024, the RCMP hosted an online consultation focusing on transparency policy engagement.<sup>68</sup> A second online consultation was launched in late January 2025 to seek public input about the strategic plan to establish an RCMP MSF.<sup>69</sup> As per one government MSF member, the fact that the RCMP was engaging with the public in this manner was evidence of 'concrete' results even if such changes were not necessarily quantifiable. At the time of writing, only information about the inputs received from the November 2024 consultation had been made public and the details provided were vague.<sup>70</sup>

Despite embracing the idea of reforming the RCMP, both current and former civil society MSF members were less sanguine about the success of the initiative, stressing that the outcome has yet to be determined.<sup>71</sup> There are at least three factors in play with this assessment. First, Milestone 4.5 focused exclusively on the development of a multi-year roadmap for open government at the RCMP. Matters pertaining to the implementation of the roadmap fell outside of the remit of the fifth action plan. Second, there was no direct civil society involvement in contributing to, or let alone overseeing, the activities set out in the RCMP’s Transparency and Trust Strategy. Third, the force has a long history of resisting civilian oversight.<sup>72</sup>

Although introducing open government reforms to the RCMP is a notable achievement, challenges persist especially due to internal cultural resistance and limited understanding of open government principles.<sup>73</sup> Milestone 4.5 and Success Indicator 4.1.5.1, both identified as promising in the Action Plan Review, were the only two items in this commitment that were not completed. Additionally, the removal of a key transparency metric from RCMP’s 2022–2023 Client and Partner Survey<sup>74</sup> made it difficult to assess progress. As stated by a government MSF member, “the lack of appropriate metrics hinders the ability to demonstrate the value of investments beyond anecdotal evidence.”<sup>75</sup> A government MSF member also noted that vague action plan language, lack of funding, and delays in securing expertise and approvals hindered progress on establishing the RCMP MSF, while civil society members cited limited insight into RCMP operations as a barrier to informed engagement.<sup>76</sup>

Initial efforts to increase transparency within the RCMP are underway. However, it is too early to determine whether these steps will lead to lasting institutional change. Cultural transformation within security institutions is inherently challenging, and concerns persist among RCMP leadership about the potential risks associated with increased transparency.<sup>77</sup> In response, the MSF is focusing on improving open government literacy and implementing cautious information-sharing practices to mitigate perceived risks.<sup>78</sup>

## Looking Ahead

In the wake of the foundational progress made thus far under Milestone 4.5, furthering RCMP reform could be included in the upcoming sixth OGP action plan<sup>79</sup> or simply carried out under the auspices of its Transparency and Trust Strategy and action plan.<sup>80</sup>

Both civil society and government members of the MSF made clear that bringing open government to the RCMP was ill-suited to the OGP’s two-year program cycle. They opined that if the reforms were to be carried forward in the sixth NAP, it would be better suited to the recently introduced four-year action plan cycle option.<sup>81</sup> Regardless, Justice Canada and the RCMP could consider the following moving forward:

- **Continue to monitor and evaluate the implementation of the RCMP’s Transparency and Trust Strategy.** Publish implementation updates at regular intervals and be clear and transparent about inputs received in relation to the action plan and whether or how such inputs are considered and/or used throughout implementation. The RCMP could also involve civil society actors working in the fields of openness and transparency monitoring, including members of the GC SIOWG, in these functions.
- Once established, **ensure that the RCMP MSF comprises a diverse range of actors** from civil society, government, academia, and the private sector. The MSF could be regularly consulted regarding the implementation of the Transparency and Trust Strategy as well as other openness, transparency, and accountability initiatives within the force. It could also play a key role in establishing priorities for releasing RCMP datasets. Consideration could also be given to whether or how to distinguish the MSF from the GC SIOWG.
- **Use OGP’s peer leaning mandate** to engage members of OGP’s Coalition on Justice who are also implementing justice commitments along with other international partners and civil society actors. This could cover successes, ongoing technological and capacity building challenges, and strategies for advancing ambitious justice-oriented reforms.
- **Leverage the Open Gov Challenge** as a strategic mechanism to advance open justice.<sup>82</sup>

- **Use clearer and more specific commitments, milestones, and success indicators** to more effectively guide the RCMP’s Transparency and Trust Strategy, especially given that previous broad statements made advancing the initiative challenging.
- Successfully changing culture within the RCMP will require commitment to open government and transparency at the most senior levels of the force. Therefore, in line with OECD recommendations, the RCMP may **explore elevating its reform agenda** and create the position of Deputy Commissioner for Open Government tasked with overseeing the advancement of transparency across the RCMP.

<sup>1</sup> The Basel Anti-Money Laundering (AML) Index combines 17 indicators and draws on data from 15 available sources including the Financial Action Task Force (FATF), Transparency International, the World Bank, and the World Economic Forum. See “Basel AML Index 2024,” Basel Institute on Governance, accessed May 2025, <https://index.baselgovernance.org>.

<sup>2</sup> “Beneficial Ownership: Transparency, Why It Matters,” Transparency International Canada, 2017, <https://transparencycanada.ca/beneficial-ownership-transparency/why-it-matters>; “Canada passes landmark legislation to fight corruption, money laundering, tax evasion, and terrorist financing,” End Snow-Washing, 2 November 2023, <https://endsnowwashing.ca>; Sasha Caldera, “Campaigning success in Canada leads to new beneficial ownership registers and more,” Open Ownership, 24 April 2025, <https://www.openownership.org/en/blog/campaigning-success-in-canada-leads-to-new-beneficial-ownership-registers-and-more>; [https://oo.cdn.ngo/media/documents/End\\_Snow-Washing\\_graphics\\_web.pdf](https://oo.cdn.ngo/media/documents/End_Snow-Washing_graphics_web.pdf); Alistair MacDonald, Paul Vieira, and Vipal Monga, “The Money Laundering Hub on the U.S. Border? It’s Canada,” Wall Street Journal, 8 August 2018, <https://www.wsj.com/articles/canada-comes-under-fire-for-money-laundering-lapses-1533729600>; Kevin Comeau, “Why We Fail to Catch Money Launderers 99.9 percent of the Time,” C. D. Howe Institute, 7 May 2019, [https://www.cdhowe.org/sites/default/files/attachments/research\\_papers/mixed/Final%20for%20release%20e-brief\\_291\\_web%20%28003%29.pdf](https://www.cdhowe.org/sites/default/files/attachments/research_papers/mixed/Final%20for%20release%20e-brief_291_web%20%28003%29.pdf); Jen St. Denis, “Canada missing 99.9 per cent of money laundering because of weak rules, expert estimates,” Toronto Star, 6 May 2019, <https://www.thestar.com/news/canada/2019/05/06/canada-missing-999-per-cent-of-money-laundering-because-of-weak-rules-expert-estimates.html>; Marco Chown Oved, “Dirty money is driving up Toronto real estate prices, report says,” Toronto Star, 21 March 2019, <https://www.thestar.com/news/canada/2019/03/21/dirty-money-is-driving-up-toronto-real-estate-prices-report-says.html>.

<sup>3</sup> The key difference between the options pertains to issues of name selection and protection, business reach, annual filings, and costs.

<sup>4</sup> See “Provincial and Federal Incorporation: What is the Difference?” Law Depot, 2023, <https://www.lawdepot.ca/resources/business-articles/provincial-and-federal-incorporation/?loc=CA>; “Incorporation FAQ - Canada-Federal,” Law Depot, 2023, <https://www.lawdepot.ca/law-library/business-articles/provincial-and-federal-incorporation/?loc=CA#.XTcf21B7IRO>; “Federal corporations forms and instructions,” Government of Canada, 2023, <https://ised-isde.canada.ca/site/corporations-canada/en/federal-corporation-forms-and-instructions>.

<sup>5</sup> Janene Charles, Trevor Rowles, and Andrew S. Cunningham, “Beneficial Ownership Transparency in Canada: An Evolving Regulatory Landscape,” Stikeman Elliot, 22 March 2023, <https://stikeman.com/en-ca/kh/corporations-commercial-law/beneficial-ownership-transparency-in-canada-an-evolving-regulatory-landscape>; “Canadian Company Data Transparency Index,” Transparency International Canada, 2022, <https://static1.squarespace.com/static/5df7c3de2e4d3d3fce16c185/t/6356f6e16347d101e848872b/1666644962519/TIC-Canadian-Company-Data-Transparency-Index-Report.pdf>.

<sup>6</sup> Government of Canada, “Canada Action Plan 2016–2018,” Open Government Partnership, 18 May 2016, <https://www.opengovpartnership.org/documents/canada-action-plan-2016-2018>; Michael Karanicolas, “IRM Progress Report: Canada 2016–2017,” Open Government Partnership, 24 April 2018, <https://www.opengovpartnership.org/documents/canada-mid-term-report-2016-2018>; Michael Karanicolas, “IRM End-of-Term Report: Canada 2016–2018,” Open Government Partnership, March 2019, [https://www.opengovpartnership.org/wp-content/uploads/2019/03/Canada\\_End-Term\\_Report\\_2016-2018\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/03/Canada_End-Term_Report_2016-2018_EN.pdf); Government of Canada, “Canada Action Plan 2018–2020,” Open Government Partnership, January 2019, [https://www.opengovpartnership.org/wp-content/uploads/2019/01/Canada\\_Action-Plan\\_2018-2020\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/01/Canada_Action-Plan_2018-2020_EN.pdf); Daniel J. Paré, “IRM Design Report: Canada 2018–2020,” Open Government Partnership, 6 July 2021, [https://www.opengovpartnership.org/wp-content/uploads/2021/07/Canada\\_Design\\_Report\\_2018-2020\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2021/07/Canada_Design_Report_2018-2020_EN.pdf); Daniel J. Paré, “IRM Transitional Results Report: Canada 2018–2021,” Open Government Partnership, 1 May 2025, [https://www.opengovpartnership.org/wp-content/uploads/2024/05/Canada\\_Transitional-Results-Report\\_2018-2021\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/05/Canada_Transitional-Results-Report_2018-2021_EN.pdf); Daniel J. Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership, 7 June 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/06/Canada\\_Action-Plan-Review\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/06/Canada_Action-Plan-Review_2022-2024_EN.pdf).

<sup>7</sup> Paré, “IRM Design Report: Canada 2018–2020,” Open Government Partnership, p. 30; Paré, “IRM Transitional Results Report: Canada 2018–2021,” Open Government Partnership; Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership.

<sup>8</sup> Karanicolas, “IRM End-of-Term Report: Canada 2016–2018,” Open Government Partnership.

<sup>9</sup> Paré, “IRM Transitional Results Report: Canada 2018–2021,” Open Government Partnership.

<sup>10</sup> Government of Canada, “Canada Action Plan 2022–2024,” Open Government Partnership, 22 September 2022, <https://www.opengovpartnership.org/documents/canada-action-plan-2022-2024>, p. 29.

<sup>11</sup> For comparative information about the progress member states of the European Union are making in implementing laws on public access to beneficial ownership information, see “EU Transparency Registers,” Dentons, accessed March 2025, [www.transparencyregisterlaws.com](http://www.transparencyregisterlaws.com).

<sup>12</sup> Individuals with significant control: (a) own, control, or direct 25% or more of shares individually, jointly or in concert with one or more individuals; (b) have control, in fact, over the corporation without owning any shares; or (3) meet a combination of (a) and (b). See “Individuals with significant control,” Innovation, Science, and Economic Development Canada, 22 January 2024, <https://ised-isde.canada.ca/site/corporations-canada/en/individuals-significant-control#2>.

<sup>13</sup> “How to find information about individuals with significant control,” Innovation, Science, and Economic Development Canada, 22 January 2024, <https://ised-isde.canada.ca/site/corporations-canada/en/how-find-information-about-individuals-significant-control>.

<sup>14</sup> “Search for a Federal Corporation,” Innovation, Science, and Economic Development Canada, 22 January 2024, <https://ised-isde.canada.ca/cc/lqcy/fdrlCrpSrCh.html?lang=eng>.

<sup>15</sup> See “Canada’s Business Registries,” Innovation, Science, and Economic Development Canada, 22 January 2024, <https://ised-isde.canada.ca/cbr-rec/en/search>.

<sup>16</sup> “C03.1.1 - Fiscal, Financial and Corporate Transparency,” Government of Canada, March 2024, <https://search.open.canada.ca/nap5/record/2024-03,C03.1.1>; “C03.1.2 - Fiscal, Financial and Corporate Transparency,” Government of Canada, March 2024, <https://search.open.canada.ca/nap5/record/2024-03,C03.1.2>; “C03.1.3 - Fiscal, Financial and Corporate Transparency,” Government of Canada, March 2024, <https://search.open.canada.ca/nap5/record/2024-03,C03.1.3>; “C03.2.1 - Fiscal, Financial and Corporate Transparency,” Government of Canada, March 2024, <https://search.open.canada.ca/nap5/record/2024-03,C03.2.1>; “C03.2.2 - Fiscal, Financial and Corporate Transparency,” Government of Canada, March 2024, <https://search.open.canada.ca/nap5/record/2024-03,C03.2.2>; “C03.3.1 - Fiscal, Financial and Corporate Transparency,” Government of Canada, December 2024, <https://search.open.canada.ca/nap5/record/2024-12,C03.3.1>; “C03.3.2 - Fiscal, Financial and Corporate Transparency,” Government of Canada, March 2024, <https://search.open.canada.ca/nap5/record/2024-06,C03.3.2>.

<sup>17</sup> Government of Canada, “Canada Action Plan 2022–2024,” Open Government Partnership.

<sup>18</sup> At the time of writing in May 2025, the registry is not yet fully populated and there is no publicly available information about the percentage to which it currently is populated.

<sup>19</sup> According to an ISED representative, as of May 31, 2025, the registry contains ISC information for 80.4% of federal corporations. However, this figure is not publicly accessible and, as such, could not be verified by the IRM researcher. Representative of Government of Canada, correspondence with IRM researcher, June 2025. For details about the information required along with what is and what is not made publicly available and sanctions for non-compliance, see: “Individuals with significant control,” Innovation, Science, and Economic Development Canada.

<sup>20</sup> Niamh Leonard, “Let’s face it, Canada has a problem with financial crime,” *Globe and Mail* 2 February 2024, <https://www.theglobeandmail.com/business/commentary/article-lets-face-it-canada-has-a-problem-with-financial-crime>.

<sup>21</sup> “Registre des entreprises,” [Business register], Government of Québec, accessed March 2025, <https://www.quebec.ca/entreprises-et-travailleurs-autonomes/obtenir-renseignements-entreprise/recherche-registre-entreprises>.

<sup>22</sup> “Money laundering and corporate ownership transparency,” Government of British Columbia, 19 September 2024, <https://www2.gov.bc.ca/gov/content/justice/anti-money-laundering/corporate-ownership-transparency>.

<sup>23</sup> Government of Ontario, *Ontario Budget: A Plan to Protect Ontario*, (May 15, 2025), <https://budget.ontario.ca/2025/index.html>

<sup>24</sup> *Key Small Business Statistics, 2024*, Innovation, Science and Economic Development Canada, <https://ised-isde.canada.ca/site/sme-research-statistics/en/key-small-business-statistics/key-small-business-statistics-2024>. Note: The information provided by Statistics Canada is comprised only of corporations with employees. Corporate registrars can provide information about all corporations (i.e., those with employees as well as those without). Given the importance of shell corporations, the latter is usually favoured in the context of beneficial ownership. According to an ISED representative, when the latter is considered, as of December 31, 2024, the three jurisdictions accounted for 80% of Canadian corporations. However, this figure is not publicly accessible and, as such, could not be verified by the IRM researcher. Representatives of Government of Canada, correspondence with IRM researcher, June 2025.

<sup>25</sup> Government of Canada, “Canada Action Plan 2022–2024,” Open Government Partnership.

<sup>26</sup> “C03.2.1 - Fiscal, Financial and Corporate Transparency,” Government of Canada; “C03.2.2 - Fiscal, Financial and Corporate Transparency,” Government of Canada; “C03.3.1 - Fiscal, Financial and Corporate Transparency,” Government of Canada; “C03.3.2 - Fiscal, Financial and Corporate Transparency,” Government of Canada.

<sup>27</sup> “Agreement to Strengthen Beneficial Ownership Transparency,” Government of Canada, 26 June 2024, <https://www.canada.ca/en/department-finance/programs/agreements/strengthen-beneficial-ownership-transparency.html>.

<sup>28</sup> “C03.2.1 - Fiscal, Financial and Corporate Transparency,” Government of Canada.

<sup>29</sup> “National Action Plan (NAP) - Indicator,” Treasury Board of Canada Secretariat, November 2024, <https://open.canada.ca/data/en/dataset/46fc3f0a-1b34-4585-b993-dfb600805d24>.

<sup>30</sup> Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership.

<sup>31</sup> “Public consultations on strengthening corporate beneficial ownership transparency in Canada: What we heard,” Innovation, Science and Economic Development Canada,” April 20, 2021, <https://ised-isde.canada.ca/site/consultation-strengthening-corporate-beneficial-ownership-transparency-canada/en/public-consultations-strengthening-corporate-beneficial-ownership-transparency-canada-what-we-heard>

<sup>32</sup> “Canada deals a massive blow to money launderers with strong legislation for a publicly accessible corporate beneficial ownership registry,” Transparency International Canada, 23 March 2023, <https://transparencycanada.ca/news/canada-deals-a-massive-blow-to-money-launderers-with-strong-legislation-for-a-publicly-accessible-corporate-beneficial-ownership-registry>.

<sup>33</sup> “Canada passes landmark legislation to fight corruption, money laundering, tax evasion, and terrorist financing,” Transparency International Canada, 2 November 2023, <https://transparencycanada.ca/news/billc42updatesnovember2-2023>.

<sup>34</sup> According to an ISED representative, as of May 31, 2025, the registry contained ISC information for some 477,215 federal corporations. However, this figure is not publicly accessible and, as such, could not be verified by the IRM researcher. Representatives of Government of Canada, correspondence with IRM researcher, June 2025.

- <sup>35</sup> Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025.
- <sup>36</sup> Representatives of Government of Canada, correspondence with IRM researcher, March 2025.
- <sup>37</sup> “Strengthening Corporate Beneficial Ownership Transparency in Canada,” Innovation, Science, and Economic Development Canada, 19 March 2020, <https://www.ic.gc.ca/eic/site/142.nsf/eng/00001.html>; “The Opportunity to Stop Snow Washing in Canada,” Transparency International, <https://transparencycanada.ca/beneficial-ownership-transparency/overview>.
- <sup>38</sup> “Regulations Amending the Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations and the Proceeds of Crime (Money Laundering) and Terrorist Financing Administrative Monetary Penalties Regulations, SOR/2025-67,” Canada Gazette Part II (159: 7), 4 March 2025, <https://gazette.gc.ca/rp-pr/p2/2025/2025-03-26/html/sor-dors67-eng.html>.
- <sup>39</sup> These sectors are factoring companies, cheque-cashing businesses, and financing and leasing entities.
- <sup>40</sup> “Who must report to FINTRAC,” Financial Transactions and Reports Analysis Centre of Canada, 12 October 2023, <https://fintrac-canafe.canada.ca/reporting-declaration/info/re-ed-eng>.
- <sup>41</sup> Vlada Gurvich, “Canada tables new regulations on money laundering and terrorist financing,” Grip, 31 March 2025, <https://www.grip.globalrelay.com/canada-tables-new-regulations-on-money-laundering-and-terrorist-financing>.
- <sup>42</sup> Gurvich, “Canada tables new regulations on money laundering and terrorist financing,” Grip; Tracy Moore, “Canada’s Beneficial Ownership Evolution,” Fenergo, 30 January 2025, <https://resources.fenergo.com/blogs/canadas-beneficial-ownership-evolution>.
- <sup>43</sup> Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025; note that this seeming shift in priority may also be linked to a change in the individual civil society members of the MSF.
- <sup>44</sup> Canada held its 45<sup>th</sup> General Election on 28 April 2025. See “Elections Canada,” Elections Canada, accessed May 2025, <https://www.elections.ca/home.aspx>.
- <sup>45</sup> Mary Francoli, “Multi-Stakeholder Forum on Open Government - MSF on Open Government Across the Open Government Partnership Lessons and Recommendations for Canada,” Government of Canada, 10 July 2023, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/98a0fddf-8ad5-4248-b7f5-ff5e59691844>.
- <sup>46</sup> Financial Action Task Force, ‘The Methodology for Assessing Technical Compliance with the FATF Recommendations and the Effectiveness of AML/CFT/CPF Systems,’ (August 2024), <https://www.fatf-gafi.org/content/dam/fatf-gafi/methodology/FATF-Assessment-Methodology-2022.pdf.coredownload.inline.pdf>; See also, <https://www.fatf-gafi.org/en/countries/detail/Canada.html>
- <sup>47</sup> Basel AML Index, ‘Methodology: What’s behind the Basel AML Index,’ <https://index.baselgovernance.org/methodology>
- <sup>48</sup> See “Open Gov Challenge,” Open Government Partnership, accessed May 2025, <https://www.opengovpartnership.org/the-open-gov-challenge>.
- <sup>49</sup> The IDRC ceased being a lead department on this commitment in 2023.
- <sup>50</sup> Catharine Tunney, “Calls to reform the RCMP have been mounting for years. What are the parties proposing?” CBC News, 15 April 2025, <https://www.cbc.ca/news/politics/rcmp-reform-federal-election-carney-poilievre-1.7509840>; Catharine Tunney and Haley Ryan, “N. S. mass shooting report condemns RCMP failures, calls for dramatic reforms CBC News,” CBC News, 30 March 2023, <https://www.cbc.ca/news/canada/nova-scotia/n-s-mass-shooting-report-condemns-systemic-rcmp-failures-calls-for-dramatic-reforms-1.6795826>; Michael Tutton and Keith Doucette, “‘We need to be more transparent’: RCMP Commissioner Lucki says police must modernize,” City News, 23 August 2022, <https://toronto.citynews.ca/2022/08/23/we-need-to-be-more-transparent-rcmp-commissioner-lucki-says-police-must-modernize/>; Kent Roach, “The RCMP needs comprehensive reform,” Policy Options, 15 August 2022, <https://policypoptions.irpp.org/magazines/august-2022/rcmp-needs-ambitious-reform/>; “Out of sight, but not out of mind: Laying bare the RCMP’s efforts to evade public transparency,” Canadian Association of Journalists, 22 February 2022, <https://caj.ca/out-of-sight-but-not-out-of-mind-laying-bare-the-rcmps-efforts-to-evade-public-transparency/>; Beatrice Britneff, “Complaints about RCMP conduct are mounting. But who holds them accountable?” Global News, 17 June 2020, <https://globalnews.ca/news/7067010/complaints-accountability-rcmp-conduct/>; Susan M. Kootneko, “Police Brutality, Discrimination and Accountability in Canada,” Inspire Law, 12 June 2020, <https://www.inspirelaw.ca/police-brutality-discrimination-and-accountability-in-canada>.
- <sup>51</sup> See “Mass Casualty Commission,” Privy Council Office, accessed May 2025, <https://masscasualtycommission.ca>.
- <sup>52</sup> Mass Casualty Commission, “Final Report: Turning the Tide Together,” Privy Council Office, 30 March 2023, <https://masscasualtycommission.ca/final-report>.
- <sup>53</sup> “Transparency and Trust Strategy Enabled by Open Government,” Royal Canadian Mounted Police, 17 May 2023, <https://open.canada.ca/data/en/dataset/40b50513-1356-4211-ae08-53580dbd32fa/resource/5ccfbb4d-5b57-4f71-9cd9-71f7b44a4404>.
- <sup>54</sup> There are nine positions allocated for the RCMP’s Open Government Office. However, as of January 2024, only three were staffed. It was envisaged that the team would expand to five people by an unspecified date in 2025. See “2022–24 NAP Implementation Tracking, Theme: Justice,” Multi-Stakeholder Forum on Open Government, 30 January 2024, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/3d150c09-63e6-4656-bfd1-f48ad021800c>.
- <sup>55</sup> “C04.5.2 – Justice,” Government of Canada, September 2024, [https://search.open.canada.ca/nap5/record/2024-09\\_C04.5.2](https://search.open.canada.ca/nap5/record/2024-09_C04.5.2); note that the RCMP’s Open Government Office was opened a few months prior to the 2022–2024 action plan commitments being finalized. See “2022–24 NAP Implementation Tracking, Theme: Justice,” Multi-Stakeholder Forum on Open Government, 29 May 2023, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/13cc73a0-9d61-4413-87f8-0fb35156068f>.
- <sup>56</sup> “RCMP launches its Open Government strategy,” Royal Canadian Mounted Police, 18 May 2023, <https://rcmp.ca/en/news/2023/05/rcmp-launches-its-open-government-strategy>; “Transparency and Trust Strategy Enabled by Open Government,” Royal Canadian Mounted Police; “C04.5.2 – Justice,” Government of Canada; “C04.5.3 - Justice,” Government of Canada, December 2024, [https://search.open.canada.ca/nap5/record/2024-12\\_C04.5.3](https://search.open.canada.ca/nap5/record/2024-12_C04.5.3).

<sup>57</sup> “C04.5.4 - Justice,” Government of Canada, December 2024, <https://search.open.canada.ca/nap5/record/2024-12.C04.5.4>

<sup>58</sup> “Vision 150 and Beyond: RCMP Strategic Plan,” Royal Canadian Mounted Police, 2024, [https://publications.gc.ca/collections/collection\\_2024/grc-rcmp/PS61-58-2021-eng.pdf](https://publications.gc.ca/collections/collection_2024/grc-rcmp/PS61-58-2021-eng.pdf); “2021–26 Strategic Plan: RCMP Specialized Policing Services,” Royal Canadian Mounted Police, 2021, [https://publications.gc.ca/collections/collection\\_2023/grc-rcmp/PS64-164-2021-eng.pdf](https://publications.gc.ca/collections/collection_2023/grc-rcmp/PS64-164-2021-eng.pdf).

<sup>59</sup> “Transparency and Trust Strategy Enabled by Open Government,” Royal Canadian Mounted Police; Mora Johnson and Millicent Seela Letoya, “Independent Review of the Governance Arrangements of Canada’s Multistakeholder Forum on Open Government,” Government of Canada, 10 July 2023, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/9d6f5b57-fc32-4903-b6a6-a530fa439a0a>.

<sup>60</sup> “2022–24 NAP Implementation Tracking, Theme: Justice,” Multi-Stakeholder Forum on Open Government, 29 May 2023; “2022–24 NAP Implementation Tracking, Theme: Justice,” Multi-Stakeholder Forum on Open Government, 30 January 2024.

<sup>61</sup> “Transparency and Trust Strategy – A Year in Review,” Royal Canadian Mounted Police, 27 May 2024, <https://open.canada.ca/data/en/dataset/679ef203-134d-466c-9ae0-10f03b5d66a3/resource/e67c62b4-d248-440d-a1e1-d85e5d7c4cba>.

<sup>62</sup> “RCMP Release Framework of Data and Information,” Royal Canadian Mounted Police, 31 May 2023, <https://open.canada.ca/data/en/dataset/8e56f67a-4d16-4b53-8e0b-e020f6931f65>.

<sup>63</sup> “Canadian Anti-Fraud Centre Fraud Reporting System Dataset,” Royal Canadian Mounted Police, 10 July 2023, <https://open.canada.ca/data/en/dataset/6a09c998-cddb-4a22-beff-4dca67ab892f>.

<sup>64</sup> Sunny Marriner, “Platform for Change: Ending Violence Association of Canada Recommendations for the RCMP Sexual Assault Investigations Review Committee Program,” Ending Violence Association of Canada, May 2024, [https://endingviolencecanada.org/wp-content/uploads/2024/08/EVA-Canada\\_RCMP-PlatformForChange-Report\\_EN.pdf](https://endingviolencecanada.org/wp-content/uploads/2024/08/EVA-Canada_RCMP-PlatformForChange-Report_EN.pdf).

<sup>65</sup> “Policy Submission: RE: BCCLLA’s submission: Draft RCMP’s Transparency and Trust Multi-Stakeholder Forum Strategic Plan,” British Columbia Civil Liberties Association, 21 February 2025, <https://bccla.org/policy-submission/bcclas-submission-draft-rcmps-transparency-and-trust-multi-stakeholderforum-strategic-plan>.

<sup>66</sup> Representatives of Government of Canada, correspondence with IRM researcher, March 2025.

<sup>67</sup> Representatives of Government of Canada, correspondence with IRM researcher, March 2025.

<sup>68</sup> See “RCMP Transparency Policy Engagement, Royal Canadian Mounted Police,” Royal Canadian Mounted Police, accessed May 2025, <https://www.placespeak.com/en/topic/23870-rcmp-transparency-policy-engagement/#/overview>.

<sup>69</sup> See “Strategic Plan to Establish a RCMP Multi-Stakeholder Forum,” Royal Canadian Mounted Police, accessed May 2025, <https://www.placespeak.com/en/topic/23903-strategic-plan-to-establish-a-rcmp-multi-stakeholder-forum/#/overview>.

<sup>70</sup> “Feedback Transformed into Action: We Asked, Your Voice, Our Actions,” Royal Canadian Mounted Police, 27 February 2025, <https://open.canada.blob.core.windows.net/opengovprod/resources/3b7b96f8-081f-4043-8946-44f3a431c5c0/we-asked-your-voice-our-action.pdf?se=2025-05-26T16%3A06%3A16Z&sp=r&sv=2024-08-04&sr=b&sig=vARL1cNpEIT%2BkcrCWanNfYImBvIgg%2B87ySXikXiX3J0%3D>.

<sup>71</sup> Former representatives of civil society, correspondence with IRM researcher, July 2023; Representatives of civil society, correspondence with IRM researcher, March 2025.

<sup>72</sup> Catharine Tunney, “Head of RCMP’s advisory board resigns, citing frustrations with federal government,” CBC News, 21 December 2023, <https://www.cbc.ca/news/politics/kent-roach-rcmp-board-1.7063945>.

<sup>73</sup> “C04.1.5 - Justice,” Government of Canada, December 2024, <https://search.open.canada.ca/nap5/record/2024-12.C04.1.5>.

<sup>74</sup> “Client and partner survey results, 2021–22: Canadians’ Views of RCMP Policing Services,” Royal Canadian Mounted Police, 2022, <https://www.rcmp-grc.gc.ca/en/reports-research-and-publications/client-and-partner-survey-results/client-and-partner-survey-results-2021-2022/canadians-views-rcmp-policing-services>.

<sup>75</sup> Representatives of Government of Canada, correspondence with IRM researcher, March 2025.

<sup>76</sup> Representatives of Government of Canada, correspondence with IRM researcher, March 2025.

<sup>77</sup> Representatives of Government of Canada, correspondence with IRM researcher, March 2025.

<sup>78</sup> Representatives of Government of Canada, correspondence with IRM researcher, March 2025.

<sup>79</sup> As of late November 2024, four key NAP themes proposed for the sixth action plan appear to have been identified of which one can envision continued RCMP reform potentially being situated. The four themes are: (i) inclusive and meaningful participation; (ii) protecting civic space and democracy in the digital era; (iii) anti-corruption, public confidence and corporate transparency; and (iv) designing inclusive government programs and services. See “2024 MSF Meeting Minutes,” Multi-Stakeholder Forum on Open Government, 29 November 2024, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/3f54b54e-77c4-41c2-b9bb-fe0bd063a048>.

<sup>80</sup> “Transparency and Trust Strategy Enabled by Open Government,” Royal Canadian Mounted Police.

<sup>81</sup> “Criteria & Standards Monthly Call Agenda,” Open Government Partnership, 5 November 2021, [https://www.opengovpartnership.org/wp-content/uploads/2021/11/SC\\_CS-Call-Summary\\_20211105.pdf](https://www.opengovpartnership.org/wp-content/uploads/2021/11/SC_CS-Call-Summary_20211105.pdf); Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025.

<sup>82</sup> “Open Gov Challenge,” Open Government Partnership.

## Section III. Participation and Co-Creation

**Civil society and government members of the MSF recognize and highly praise their collective efforts in promoting open government in the face of persistent challenges in deepening civil society engagement and securing political leadership. Limited co-creation, constrained by structural and budgetary factors, resulted in an action plan shaped largely by existing departmental agendas. Aligning with OECD recommendations, civil society began redefining their role by championing a broader open government agenda extending beyond the action plan.**

Prior to September 2023, responsibility for overseeing and implementing Canada’s OGP process fell under the remit of the Treasury Board of Canada Secretariat’s (TBS) Open Government Team. Under that structure, individual federal departments and agencies—sometimes in collaboration with the TBS—were responsible for delivering on the commitments and milestones. In the context of designing and implementing national action plans, the Open Government Team functioned principally as coordinator and facilitator, serving as an intermediary between civil society members of the MSF and lead commitment implementers from the government side.

As part of an intra-departmental restructuring, in the third and fourth quarters of 2023, the Open Government Team was merged with the newly established Access to Information Policy and Performance Division (AIPPD) of the TBS. Open data activities remained connected to open government activities (i.e., OGP national action plans, other OGP and non-OGP open government policies). Meanwhile, accountabilities moved to the Information and Data Governance team to ensure a greater connection with the federal government’s Data Strategy for the Federal Public Service<sup>1</sup> as well as Policy on Service and Digital.<sup>2</sup> The Executive Director of AIPPD has served as the government co-chair of the MSF since this change was implemented.

Canada has never dedicated funding explicitly to creating and implementing OGP action plans.<sup>3</sup> With OGP activities not being part of any department or agency’s core mandate, commitments have consistently been designed and implemented in accord with the existing operating schedules and annual budgets of their lead implementers. To date, this approach has served to orient thinking about action plan content foremost toward deliverables that can fit with existing departmental initiatives, budgets, operating schedules, and be successfully achieved within the two-year time frame of OGP action plan cycle.

The MSF on Open Government has been a fixture of OGP activities in Canada since its launch in January 2018.<sup>4</sup> It meets quarterly, with one in-person meeting per year. Prior to each quarterly meeting, civil society MSF members meet to plan and strategize. The MSF co-chairs remain in contact throughout the year. Until early 2025, the mandate of civil society members was for a two-year term that was renewable for one additional year.<sup>5</sup> This has since been changed to a four-year term.<sup>6</sup> Civil society members are chosen via a public nomination process and a “committee comprised of two civil society members from the current MSF, elected by civil society members.”<sup>7</sup> During the span of the current action plan cycle, three new members joined as the mandates of previous members came to an end, including the previous civil society co-chair. Lack of gender, race, and linguistic diversity in the MSF has been a challenge since its inception, with its members highlighting that greater emphasis is now being placed on actively addressing issues of diversity, equity, and inclusion.<sup>8</sup>

Information about OGP activities is made publicly available through the National Action Plan on Open Government Tracker portal,<sup>9</sup> which tracks the implementation progress of commitments. Civil society members of the MSF also periodically communicate OGP information to other civil society actors via personal and professional networks and however else they deem fit.

### Action Plan Co-Creation

The agenda for Canada’s fifth national action plan was developed through limited iterative dialogue with non-government actors. In line with public health guidelines in force at the time, the co-creation process took place entirely through online channels from July 2021 to February 2022. The various related activities were announced ahead of time via multiple online and social media channels (e.g., Government of Canada website, Twitter (now X), and LinkedIn). In terms of the

strengths and limitations of the action plan development process, and as noted in the preamble of the 2022-2024 national action plan document, both civil society and government members of the MSF expressed some dissatisfaction with the process.<sup>10</sup> This dissatisfaction was linked, in part, to the fact that both sides are learning by doing.<sup>11</sup> The principal strength of the process was the back-and-forth dialogue that developed in tandem with developing the action plan and which saw government members of the MSF reporting back to their civil society counterparts—at their behest—about progress being made on their inputs and requests.<sup>12</sup>

Whereas the themes and commitments were broadly adopted in a co-creative manner through public outreach and consultations with the civil society members of the MSF,<sup>13</sup> the accompanying 19 milestones and 106 activities identified as success indicators were primarily deliverables that fit into the lead implementers' existing government activities and initiatives. Several MSF members reported that some of the priorities identified by civil society members of the MSF in 2021 were not pursued because no lead departments or agencies would carry them forward.<sup>14</sup>

### Participation during Implementation

Aside from the mandated shift to online interactions during the Covid-19 pandemic, practices of engagement, dialogue, and joint decision-making among members of the MSF and non-government stakeholders during the implementation of the NAP did not differ in any substantive sense from any previous action plans since 2018. Three series of implementation meetings were held in November 2022,<sup>15</sup> May 2023,<sup>16</sup> and January 2024.<sup>17</sup> At these meetings, civil society MSF members were updated about implementation progress and provided opportunities to ask questions about the progress of the commitments, offer suggestions for ways forward, and identify civil society connections with whom commitment leads could potentially connect. Additionally, commitment leads were encouraged to work with the MSF as well as their own stakeholders and civil society connections in implementing their commitments. The Open Government Team did not specifically arrange any additional civil society involvement.<sup>18</sup>

In previous action plan cycles, civil society MSF members were updated about, but largely detached from, action plan implementation due to a lack of time and resources.<sup>19</sup> With two-year program cycles, their focus shifted almost immediately to the next action plan once implementation started. The key innovation in participatory practice during the implementation of this action plan was that civil society members of the MSF actively and purposefully turned their attention away from commitment implementation.<sup>20</sup> Despite viewing action plan commitments as important constituent elements of advancing open government in Canada, these stakeholders did not consider them nor OGP action plans as the key factors driving the expansion of accountability, civic participation, and transparency across government.<sup>21</sup> Some individuals reported lacking sufficient knowledge about individual commitments and their intended beneficiaries as well as the requisite expertise to monitor and contribute to commitment implementation.<sup>22</sup> In line with this view, some prior and current civil society members declined to speak with the IRM researcher on the grounds that they had nothing to share about action plan implementation.

The civil society members' engagement in commitment implementation appears to have been largely limited to participation in the November 2022, May 2023, and January 2024 meetings. Some civil society members with whom the IRM researcher spoke relayed feeling there was somewhat of a mismatch between the time allotted for the implementation meetings and the amount of materials to cover.<sup>23</sup> This perception was tempered with a recognition that individual civil society MSF members were volunteering their time while maintaining professional lives outside the MSF and therefore did not necessarily have time for more frequent or longer meetings.<sup>24</sup>

Civil society MSF members found the Open Government Team<sup>25</sup> to be comprised of very dedicated, hard-working public servants who are actively working to promote open government within the government. Nonetheless, they also noted that these staff lack the authority and institutional support to effectuate whole-of-government change.

In May 2024, the TBS released its *Government of Canada Trust and Transparency Strategy*,<sup>26</sup> which was developed in response to a 2021 internal evaluation carried out by the TBS Internal Audit and Evaluation Bureau.<sup>27</sup> The evaluation called for a “whole-of-government blueprint to strengthen public trust in federal institutions.”<sup>28</sup> Additionally, it also built on recommendations from the OECD's 2023 *Open Government Scan of Canada* which calls for Canada to develop “a holistic

federal open government strategy.”<sup>29</sup> The timing of this internally developed strategy for which no civil society input was sought coincided with the shifting perspective of the role of the MSF, and its desire to have a greater impact and influence on the broader agenda of open government.<sup>30</sup> In January 2024, hoping to inform the development of the government’s Trust and Transparency Strategy,<sup>31</sup> civil society members of the MSF submitted a ‘Success Factors’ memo to the TBS advancing seven principles they deemed necessary for ensuring open government strategies affect meaningful progress in Canada.<sup>32</sup> According to civil society members of the MSF, the Trust and Transparency Strategy is too high level and lacks key elements identified by the OECD as important to an open government strategy, including the need to outline major initiatives and projects, provide guidelines for achieving objectives, allocate adequate resources, and having “a dedicated section on monitoring and evaluation.”<sup>33</sup> The Success Factors document has now been refined and repositioned as advice to the government for implementing the Trust and Transparency Strategy. The goal is to achieve this by engaging with the new President of the TBS, incorporating relevant commitments into the upcoming OGP national action plan, and collaborating through the MSF to define a shared vision of success that can guide future efforts.<sup>34</sup>

The IRM uses the OGP Participation and Co-Creations Standards to assess countries’ participatory practices throughout the action plan cycle.<sup>35</sup> Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.<sup>36</sup>

**Table 2. Compliance with Minimum Requirements**

Minimum requirement	Co-creation	Implementation
<b>1.1 Space for dialogue:</b> MSF meetings took place quarterly. In 2023, it met four times (January, April, July, and October) and then in 2024 another four times (February, twice in April, and November), Three meetings per year took place virtually and one was conducted in person. Information about the MSF’s basic rules is publicly available online. <sup>37</sup>	Yes	Yes
<b>2.1 OGP website:</b> The federal government maintains a publicly available website dedicated to the country’s participation in OGP. All five of Canada’s action plans to date are also available. <sup>38</sup>	Yes	Yes
<b>2.2 Repository:</b> The Open Government Tracker is an online tool available without barriers to access and linked (to varying extents) to evidence which is regularly updated. <sup>39</sup> There are, however, notable variations across commitments in the level of detail provided in individual updates.	Yes	Yes
<b>3.1 Advanced notice:</b> See the Action Plan Review. <sup>40</sup>	Yes	Not applicable
<b>3.2 Outreach:</b> See the Action Plan Review. <sup>41</sup>	Yes	Not applicable
<b>3.3 Feedback mechanism:</b> See the Action Plan Review. <sup>42</sup>	Yes	Not applicable
<b>4.1 Reasoned response:</b> See the Action Plan Review. <sup>43</sup>	Yes	Not applicable
<b>5.1 Open implementation:</b> The government met with civil society stakeholders on the MSF during implementation of the action plan. Members had the opportunity to comment in these meetings. <sup>44</sup> The first series of implementation meetings took place in November 2022, <sup>45</sup> followed by a series of meetings in May 2023 <sup>46</sup> and a third series in January 2024. <sup>47</sup>	Not applicable	Yes

<sup>1</sup> “2023–2026 Data Strategy for the Federal Public Service,” Treasury Board of Canada Secretariat, 13 March 2024, <https://www.canada.ca/en/treasury-board-secretariat/corporate/reports/2023-2026-data-strategy.html>.

<sup>2</sup> “Policy on Service and Digital,” Treasury Board of Canada Secretariat, 2 December 2024, <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32603>.

<sup>3</sup> Daniel J. Paré, “IRM Design Report: Canada 2018–2020,” Open Government Partnership, 6 July 2021, [https://www.opengovpartnership.org/wp-content/uploads/2021/07/Canada\\_Design\\_Report\\_2018-2020\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2021/07/Canada_Design_Report_2018-2020_EN.pdf).

<sup>4</sup> For a detailed account of the formation and launching of Canada’s OGP MSF, see Paré, “IRM Design Report: Canada 2018–2020,” Open Government Partnership; for information and resources about the MSF, see: “Multi-Stakeholder Forum on Open Government,” Government of Canada, 22 May 2025, <https://www.canada.ca/en/government/system/government-wide-reporting-spending-operations/trust-transparency/about-open-government/multi-stakeholder-forum-open-government.html>.

<sup>5</sup> This amendment was confirmed at the February 2025 meeting of the MSF. However, the minutes of the meeting are not yet publicly available.

- <sup>6</sup> See “Multi-Stakeholder Forum on Open Government – MSF Terms of Reference,” Treasury Board of Canada Secretariat, 12 February 2025, <https://open.canada.ca/data/en/dataset/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/cbbf2b58-d580-47be-8555-3076d5642bdf>.
- <sup>7</sup> For data on resources about the MSF including terms of reference and meeting minutes, see: “Multi-Stakeholder Forum on Open Government,” Treasury Board of Canada Secretariat, 18 January 2023, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48>.
- <sup>8</sup> See “Multi-Stakeholder Forum on Open Government,” Government of Canada; “Multi-Stakeholder Forum on Open Government,” Treasury Board of Canada Secretariat.
- <sup>9</sup> See “Search National Action Plan on Open Government Tracker,” Government of Canada, accessed March 2025, <https://search.open.canada.ca/nap5>.
- <sup>10</sup> Government of Canada, “Canada Action Plan 2022–2024,” Open Government Partnership, 22 September 2022, <https://www.opengovpartnership.org/documents/canada-action-plan-2022-2024>.
- <sup>11</sup> Multi-Stakeholder Forum on Open Government, “2021 MSF Meeting Minutes,” Government of Canada, 7 September 2023, <https://open.canada.ca/data/en/dataset/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/9fe11fe0-7f00-4369-8dbd-a8ba75c86de7>.
- <sup>12</sup> Daniel J. Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership, 7 June 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/06/Canada\\_Action-Plan-Review\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/06/Canada_Action-Plan-Review_2022-2024_EN.pdf), p. 4.
- <sup>13</sup> See “Consultation Data for Canada’s 2022–24 National Action Plan (NAP) on Open Government,” Government of Canada, accessed March 2025, <https://open.canada.ca/data/en/dataset/35fa8dc5-e9c5-4434-8e29-967ee9b90618>; “What We Heard Report,” Government of Canada, 11 January 2024, <https://open.canada.ca/en/content/what-we-heard-report>.
- <sup>14</sup> Former representatives of civil society, correspondence with IRM researcher, July 2023; Representatives of civil society and Government of Canada, correspondence with IRM researcher, March 2025.
- <sup>15</sup> “Multi-Stakeholder Forum on Open Government – May 2023 – 2022–24 NAP Implementation Tracking Meetings,” Government of Canada, 9 February 2024, <https://open.canada.ca/data/en/dataset/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/1d048a37-054a-4e89-85f3-08dee46aea47>.
- <sup>16</sup> “Multi-Stakeholder Forum on Open Government – May 2023 – 2022–24 NAP Implementation Tracking Meetings,” Government of Canada.
- <sup>17</sup> There is no record available online about an implementation meeting for Commitment 3. See “Multi-Stakeholder Forum on Open Government - January 2024 – 2022–24 NAP Implementation Tracking Meetings,” Government of Canada, 23 July 2024, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/3d150c09-63e6-4656-bfd1-f48ad021800c>.
- <sup>18</sup> Representatives of Government of Canada, correspondence with the IRM researcher, March 2025.
- <sup>19</sup> Paré, “IRM Design Report: Canada 2018–2020,” Open Government Partnership; Daniel J. Paré, “IRM Transitional Results Report: Canada 2018–2021,” Open Government Partnership, 1 May 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/05/Canada\\_Transitional-Results-Report\\_2018-2021\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/05/Canada_Transitional-Results-Report_2018-2021_EN.pdf).
- <sup>20</sup> Representatives of civil society, correspondence with IRM researcher, March 2025.
- <sup>21</sup> Mora Johnson and Millicent Seela Letoya, “Independent Review of the Governance Arrangements of Canada’s Multistakeholder Forum on Open Government,” Government of Canada, 10 July 2023, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48/resource/9d6f5b57-fc32-4903-b6a6-a530fa439a0a>.
- <sup>22</sup> Representatives of civil society, correspondence with IRM researcher, March 2025.
- <sup>23</sup> Representatives of civil society, correspondence with IRM researcher, March 2025.
- <sup>24</sup> Representatives of civil society, correspondence with IRM researcher, March 2025.
- <sup>25</sup> Recall that Canada’s Open Government Team was formally disbanded in September 2023. However, many of the individuals where were either members of or affiliated with the team’s work continue to be actively involved in open government related work within the Canadian government.
- <sup>26</sup> “Government of Canada Trust and Transparency Strategy,” Treasury Board of Canada Secretariat, 23 August 2024, <https://www.canada.ca/en/government/system/government-wide-reporting-spending-operations/trust-transparency/government-canada-trust-and-transparency-strategy.html#toc0>.
- <sup>27</sup> “Evaluation of the Open Government Program,” Treasury Board of Canada Secretariat, 7 June 2021, <https://www.canada.ca/en/treasury-board-secretariat/corporate/reports/evaluation-open-government-program.html>.
- <sup>28</sup> “Government of Canada Trust and Transparency Strategy,” Treasury Board of Canada Secretariat.
- <sup>29</sup> “Open Government Scan of Canada: Designing and implementing an open government strategy,” Organization for Economic Co-operation and Development, 27 February 2023, [https://www.oecd.org/en/publications/open-government-scan-of-canada\\_1290a7ef-en/full-report/component-3.html#section-d1e124-0d7fc61da4](https://www.oecd.org/en/publications/open-government-scan-of-canada_1290a7ef-en/full-report/component-3.html#section-d1e124-0d7fc61da4).
- <sup>30</sup> Representatives of Government of Canada, correspondence, March 2025; also see Johnson and Letoya, “Independent Review of the Governance Arrangements of Canada’s Multistakeholder Forum on Open Government,” Government of Canada.
- <sup>31</sup> Representatives of civil society, correspondence with IRM researcher, May 2025.
- <sup>32</sup> Civil Society Members of Canada’s Multi-Stakeholder Forum on Open Government, “Success factors for open government strategies in Canada – A policy brief,” Morris J. Wosk Centre for Dialogue, 10 March 2025, <https://www.sfu.ca/content/dam/sfu/dialogue/ImagesAndFiles/KnowledgePractice/StrengtheningCanadianDemocracy/SuccessFactorsforOpenGovernment-20250314.pdf>.
- <sup>33</sup> “Open Government Scan of Canada: Designing and implementing an open government strategy,” Organization for Economic Co-operation and Development.
- <sup>34</sup> Representatives of civil society, correspondence with IRM researcher, May 2025.
- <sup>35</sup> “OGP Participation and Co-Creation Standards,” Open Government Partnership, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards>.

---

<sup>36</sup> “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, 2022, [https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements\\_20220531\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf).

<sup>37</sup> For data on resources about the MSF including terms of reference and meeting minutes, see: “Multi-Stakeholder Forum on Open Government,” Treasury Board of Canada Secretariat, 18 January 2023, <https://open.canada.ca/data/en/info/cd94b0b3-c328-4468-958e-ccd7bd140b48>.

<sup>38</sup> “National Action Plan on Open Government,” Government of Canada, 14 February 2025, <https://www.canada.ca/en/government/system/government-wide-reporting-spending-operations/trust-transparency/about-open-government/national-action-plan-open-government.html>.

<sup>39</sup> “Search National Action Plan on Open Government Tracker,” Government of Canada, accessed March 2025, <https://search.open.canada.ca/nap5>.

<sup>40</sup> Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership, p. 4.

<sup>41</sup> Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership, p. 4.

<sup>42</sup> Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership, p. 4.

<sup>43</sup> Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership, p. 4.

<sup>44</sup> “Multi-Stakeholder Forum on Open Government,” Treasury Board of Canada Secretariat.

<sup>45</sup> “Multi-Stakeholder Forum on Open Government – May 2023 – 2022–24 NAP Implementation Tracking Meetings,” Government of Canada.

<sup>46</sup> “Multi-Stakeholder Forum on Open Government – May 2023 – 2022–24 NAP Implementation Tracking Meetings,” Government of Canada.

<sup>47</sup> There is no record available online about an implementation meeting for Commitment 3. See “Multi-Stakeholder Forum on Open Government - January 2024 – 2022–24 NAP Implementation Tracking Meetings,” Government of Canada.

## Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.<sup>1</sup>

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

### Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.<sup>2</sup> The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

### Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected through desk research, interviews, et cetera, the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.
- **Moderate Results:** According to the evidence collected through desk research, interviews, et cetera, the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

- **Significant Results:** According to the evidence collected through desk research, interviews, et cetera, the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Daniel J. Paré and was externally expert reviewed by Brendan Halloran. The IRM methodology, quality of IRM products, and review process is overseen by the IRM’s International Experts Panel (IEP).<sup>3</sup> For more information, refer to IRM webpage<sup>4</sup> or the glossary of IRM and OGP terms.<sup>5</sup>

---

<sup>1</sup> For definitions of OGP terms, such as co-creation and promising commitments, see “OGP Glossary,” Open Government Partnership, accessed May 2025, <https://www.opengovpartnership.org/glossary>.

<sup>2</sup> The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “Potential for Results” and “Early Results” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

<sup>3</sup> “International Experts Panel,” Open Government Partnership, accessed May 2025, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>.

<sup>4</sup> “IRM Overview,” Open Government Partnership, accessed May 2025, <https://www.opengovpartnership.org/irm-guidance-overview>.

<sup>5</sup> “OGP Glossary,” Open Government Partnership.

## Annex I. Commitment Data<sup>1</sup>

<b>Commitment 1: Climate change and sustainable growth</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> <li>● <b>Early results:</b> No Notable Results</li> </ul>
<p>This commitment focused on joining “levels of governments, businesses, and citizens in improving our collective understanding of climate change and its impacts on ecosystems” and helping “inform decision-making and build climate change resiliency, which will contribute to the implementation of the National Adaptation Strategy.”<sup>2</sup> The commitment was comprised of four milestones divided into 13 activities aimed at making information related to the cumulative effects of climate change and sustainable growth easier to find and understand, improving information on energy use and GHG emissions, making climate change science more open and accessible, and providing climate data and information to support adaptation decision making and help build resilience to climate change. Twelve of the 13 activities were completed, with Activity C01.2.3 recording limited progress.<sup>3</sup> Data gaps and resource constraints were main reported barriers during implementation.<sup>4</sup> The commitment resulted in online tools, data release, education and training, and pilot projects. These activities constituted an incremental positive step in providing opportunities for Canadians who possess the necessary resources, capacities, and skills to access and make purposeful use of information about climate change and its impacts on ecosystems. In the absence of indicators explaining why or how the released information was considered important, as well as data on how and by whom it is being used, Commitment 1 is assessed as having no notable results.</p>	
<b>Commitment 2: Democracy and civic space</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> <li>● <b>Early results:</b> No Notable Results</li> </ul>
<p>This commitment aimed to combat disinformation, safeguard fair elections, foster social inclusion and trust toward public institutions, as well as inclusively protecting on- and off-line civic space.<sup>5</sup> Built upon Commitment 6 from the previous NAP, the commitment comprised four milestones divided into 26 activities aimed at addressing the rising spread of disinformation and its consequences, safeguarding Canadian electoral and democracy processes by combatting foreign threats, taking steps toward strengthening trust, inclusion, and social cohesion, and advancing digital inclusion with a focus on shaping global norms, empowering multi-stakeholder engagement, and boosting communication and outreach.<sup>6</sup> Eighteen of the 26 activities were completed, three others recorded substantial progress, and five limited progress.<sup>7</sup> No explanations are provided in the Open Government Tracker as to why progress was hampered for Activities C02.2.4, C02.2.5, and C02.2.6.<sup>8</sup> Meanwhile, Activity C02.1.03 was halted due to the Covid-19 pandemic and C02.1.02 due to insufficient applications.<sup>9</sup> Despite taking positive steps, this commitment lacked a clear logic model linking it to the specified milestones and success indicators.<sup>10</sup> Its connection to open government—defined as improving transparency, promoting citizen participation in public affairs, and strengthening accountability mechanisms—was ambiguous. As such, it is assessed as having no notable open government results.</p>	
<b>Commitment 3: Fiscal, financial and corporate transparency</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Substantial</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> <li>● <b>Early results:</b> Significant</li> </ul>

This commitment is assessed in Section II.	
<b>Commitment 4: Justice</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> <li>● <b>Early results:</b> Moderate</li> </ul>
This commitment is assessed in Section II.	
<b>Commitment 5: Open Data for Results</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> <li>● <b>Early results:</b> Moderate</li> </ul>
<p>This commitment aimed to make the government “manage data and information in an open and strategic manner, build a more mature open government and open data ecosystem, and focus on disaggregated data.”<sup>11</sup> There were 38 activities grouped under three milestones comprising the commitment. Of these, 26 activities were completed and the remaining 12 achieved substantial progress.<sup>12</sup> The commitment resulted in the creation of some online tools and frameworks, data release, education and training, and pilot projects. The most notable of these activities were: (1) the establishment of an Open Data Advisory Group comprised of government officials, civil representatives, academics, and open data experts to contribute to advancing open government and open data initiatives;<sup>13</sup> (2) the work with Indigenous governments and organizations in creating a Policy on External Data Sharing;<sup>14</sup> along with (3) the release of data from the Canadian Survey on Disability and related work.<sup>15</sup> Together, the commitment’s activities constituted an incremental positive step in providing opportunities for Canadians who possess the necessary resources, capacities, and skills to access and make purposeful use of open data resources. However, it largely continued ongoing practices without indication of enhancing the enabling environment to build trust between citizens and the state. Based on evidence available at the time of assessment, the commitment is assessed as having moderate early results.</p>	

<sup>1</sup> Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments’ short titles may have been edited for brevity. For the complete text of commitments, see Government of Canada, “Canada Action Plan 2022–2024,” Open Government Partnership, 22 September 2022, <https://www.opengovpartnership.org/documents/canada-action-plan-2022-2024>,
3. For more information on the assessment of the commitments’ design, see Daniel J. Paré, “IRM Action Plan Review: Canada 2022–2024,” Open Government Partnership, 7 June 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/06/Canada\\_Action-Plan-Review\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/06/Canada_Action-Plan-Review_2022-2024_EN.pdf).

<sup>2</sup> See Theme 1 Commitment in Government of Canada, “Canada Action Plan 2022–2024,” Open Government Partnership.

<sup>3</sup> See “Commitment 1 - Search National Action Plan on Open Government Tracker,” Government of Canada, accessed March 2025, <https://search.open.canada.ca/nap5/?page=1&sort=indicators+asc&commitments=C01>

<sup>4</sup> “C01.2.3 - Climate Change and Sustainable Growth,” Government of Canada, December 2024, <https://search.open.canada.ca/nap5/record/2024-12,C01.2.3>.

<sup>5</sup> See Theme 2 Commitment in Government of Canada, “Canada Action Plan 2022–2024,” Open Government Partnership.

<sup>6</sup> See Theme 2 Commitment in Government of Canada, “Canada Action Plan 2022–2024,” Open Government Partnership.

<sup>7</sup> See “Commitment 2 - Search National Action Plan on Open Government Tracker,” Government of Canada, accessed March 2025, <https://search.open.canada.ca/nap5/?page=1&sort=indicators+asc&commitments=C02>.

<sup>8</sup> “C02.2.4 - Democracy and Civic Space,” Government of Canada, March 2023, <https://search.open.canada.ca/nap5/record/2023-03,C02.2.4>; “C02.2.5 - Democracy and Civic Space,” Government of Canada, March 2023, <https://search.open.canada.ca/nap5/record/2023-03,C02.2.5>; “C02.2.6 - Democracy and Civic Space,” Government of Canada, March 2024, <https://search.open.canada.ca/nap5/record/2024-03,C02.2.6>.

<sup>9</sup> “C02.1.02 - Democracy and Civic Space,” Government of Canada, December 2024, <https://search.open.canada.ca/nap5/record/2024-12,C02.1.02>; “C02.1.03 - Democracy and Civic Space,” Government of Canada, December 2024, <https://search.open.canada.ca/nap5/record/2024-12,C02.1.03>.

<sup>10</sup> Most of the success indicators for this commitment are activities, not measurements.

<sup>11</sup> See Theme 5 Commitment in Government of Canada, “Canada Action Plan 2022–2024,” Open Government Partnership.

<sup>12</sup> See “Commitment 5 - Search National Action Plan on Open Government Tracker,” Government of Canada, accessed March 2025, <https://search.open.canada.ca/nap5/?page=1&sort=indicators+asc&commitments=C05>.

<sup>13</sup> “C05.2.02 - Open Data for Results,” Government of Canada, December 2024, <https://search.open.canada.ca/nap5/record/2024-12,C05.2.02>.

<sup>14</sup> “C05.2.08 - Open Data for Results,” Government of Canada, December 2024, <https://search.open.canada.ca/nap5/record/2024-12,C05.2.08>.

<sup>15</sup> “C05.3.08 - Open Data for Results,” Government of Canada, December 2024, <https://search.open.canada.ca/nap5/record/2024-12,C05.3.08>.