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The Hon. François-Philippe Champagne
Minister of Innovation, Science and Industry
Government of Canada
Francois-Philippe.Champagne@parl.gc.ca

Dear Minister Champagne,

Re: Consultation on Canadian Guardrails for Generative AI – Code of Practice

We are pleased to provide comments as part of the consultation on the draft Code of Practice for Generative AI Systems, published by Innovation, Science and Economic Development Canada (ISED).

This submission is made on behalf of [AccessPrivacy](#), a thought leadership platform established by the national Privacy and Data Management Team at Osler, Hoskin & Harcourt LLP.

AccessPrivacy hosted an interactive online workshop on August 30, designed to help organizations (a) understand the scope, meaning, and impact of the proposed Code of Practice, and (b) prepare their own submissions for ISED's consultation process.

Over 720 individuals from a breadth of industry sectors registered to attend the workshop, including representatives from retail, health and health research, banking, telecommunications, companies in the AI ecosystem, multiple trade associations, Canadian federal and provincial governmental ministries, privacy regulatory and other regulatory authorities, civil society and academia. Several representatives from ISED registered for the session.

The [recording of the full session is available here](#), for consideration by ISED as part of the consultation.

The workshop consisted of a two-hour discussion, moderated by [Adam Kardash](#), Chair of Osler's Privacy and Data Management team and National Lead of AccessPrivacy, and included comments and insights from AI experts [Dr. Teresa Scassa](#) (Canada Research Chair in Information Law and Policy, University of Ottawa), [Sam Ip](#) (Osler partner, Technology), as well as comments from workshop attendees.

The workshop focused on the themes of the numerous queries and comments Osler has received from its Canadian and foreign-based clients about the proposed Code of Practice for Generative AI, specifically about:

- **the consultation process** (5:50 of the recording);
- **the purpose of the Code of Practice** (18:15 of the recording);
- **the scope of application of the Code of Practice** (31:55) of the recording); and
- **the substance of the Code of Practice** (47:00 of the recording).

The second part of the workshop consisting of comments from workshop attendees begins at 61:30 of the recording.

Thank you in advance for your consideration of the comments and proposals raised in our workshop session.

Sincerely,



Adam Kardash

Chair, Privacy and Data Management
National Lead, AccessPrivacy
Osler, Hoskin & Harcourt LLP