



**Canadian Vehicle
Manufacturers' Association**
Association canadienne
des constructeurs de véhicules

116 Albert Street
Suite 300
Ottawa, ON K1P 5G3

Tel: 416-364-9333
info@cvma.ca
www.cvma.ca

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Standing Committee on Resource Stewardship
c/o Committee Clerk to the Standing Committee on Resource Stewardship
3rd Floor, 9820 – 107 Street NW,
Edmonton, AB T5K 1E7

RSCommittee.Admin@assembly.ab.ca

Re: Personal Information Protection Act Review

Dear Sir/Madam:

The members of the Canadian Vehicle Manufacturers' Association (CVMA), including Ford Motor Company of Canada, Limited, General Motors of Canada Company and Stellantis (FCA Canada Inc.) appreciate this opportunity to provide input to the review of the Alberta Personal Information Protection Act. This is an important endeavour and the CVMA is very interested to engage throughout the process.

As noted in the *'Emerging Issues'* document, there are multiple jurisdictions that have or are in the process of modernizing their respective privacy frameworks. It is paramount that there is jurisdictional alignment across privacy frameworks to provide certainty for governments, consumers and business and to mitigate unintended consequences including increased complexity, costs, and consent fatigue.

The federal government Bill C-27, *"An Act to Enact the Consumer Privacy Protection Act, the Personal Information and Data Protection Tribunal Act and the Artificial Intelligence and Data Act"* proposes significant changes to the current privacy landscape under PIPEDA (Personal Information Protection and Electronic Documents Act). The House of Commons Committee on Industry and Technology (INDU) is taking time to undertake a detailed clause-by-clause review and to consider a number of proposed amendments.

To support certainty for both Canadian consumers and business, it will be important to understand how the federal privacy framework evolves prior to advancing provincial approaches to mitigate potential misalignment. From an automotive industry perspective, privacy frameworks need to be structured in a way that does not stifle innovation, impede the rollout of technologies as required by government, undermine research and development activities, nor add complexity for consumers.

The CVMA strongly recommends Alberta continue with its' review of PIPA but to not move forward with proposed legislation until the federal approach is known and understood. A phased approach that would include an assessment of the federal legislation and consultation on any gaps that could be addressed through provincial updates is encouraged.

We are committed to working with you to ensure Alberta's privacy modernization provides adequate protection of consumer's personal information, addresses the emerging patchwork of privacy laws across the country and enables Canadian businesses to remain competitive.

Please do not hesitate to contact me directly at [REDACTED] or at bkingston@cvma.ca to discuss further.

Yours sincerely,



Brian Kingston
President & Chief Executive Officer