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Canada's Regulatory Obstacle Course

The Cabinet Directive on Streamlining Regulation and the Public Interest

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The 2010 federal budget announced the creation of a new Red Tape commission. Like tax cuts, deregulation is a record that governments love to play over and over again. And in Canada, this song has been repeated many times since the 1980s. In fact, a sweeping overhaul of federal regulation was announced just three years earlier in the 2007 budget. For most budget watchers, the new federal regulatory policy was of passing interest compared to the billions of dollars of taxes and expenditures in budget. But the new Cabinet Directive on Streamlining Regulation (CDSR) could prove to be one of the most profound and long-lasting items in that budget document.[1]

Corporations, the object of regulation, have long had the opportunity to comment on draft regulations and provide input into the development of regulations. While there are legitimate concerns about "regulatory capture" of civil servants by corporate interests, some level of transparency and engagement is required in order to develop effective regulations. In more recent iterations of federal regulatory policy, however, those corporate interests have been written into the heart of the policy-making process. By explicitly building corporate interests as an item to be weighed against the public interest in developing new regulations, the CDSR establishes a framework that is, in fact, hostile to regulation, reflected in numerous obstacles to new and existing regulations.

The CDSR is at odds with the views of most Canadians who simply expect federal and provincial governments to take measures to ensure public health, protect the environment, and make workplaces safe, among other things. They just want the job to get done and place their trust in government to make it so (to a fault, Canadians often assume that someone is keeping a watchful eye over the marketplace). Canadians strongly support existing and new regulation in the public interest, a point supported by new polling done by Environics for the CCPA and summarized in this paper.

The CDSR is pernicious because it attacks the very process by which regulations are developed. As a regulatory policy, it is much more explicit and restrictive than its predecessor, the 1999 *Government of Canada Regulatory Policy*, by introducing new hurdles that must be passed in order for a department to pass a new regula-

tion. The previous *Regulatory Policy* had already been criticized for putting economic objectives on equal footing with the objectives of regulation itself. A 2000 review of federal health and safety programs by the Auditor General criticized attempts by the government to simultaneously balance health and safety regulatory demands with economic objectives, and recommended that:

> The federal government should explain to Canadians and the government's regulatory and inspection community its priorities for health and safety regulatory programs, particularly the balance that the government has reached to protect Canadians and address budget, social, economic and trade objectives. The government should revise its regulatory policy and other policies to reflect this emphasis.[2]

Yet, the government's response has not been to amend the egregious aspects of the previous regulatory policy but to go even further in the wrong direction. Thus, the CDSR is a deeply flawed framework for the development of regulations in Canada, at a time when the recent financial crisis or the longer-term climate crisis demand effective action that is historically the domain of regulation.

Public Opinion and the Public Interest

Regulations are rarely called for unless something goes awry, but over the course of history enough things go wrong that regulations come into existence to protect the public from a repeat of an environmental disaster, a disease outbreak, the exposure of horrible working conditions, and so on. Thus, to the extent that regulation exists at all, it usually is rooted in public support based on real world experience.

Inside government, regulation is contested terrain. As democratic representatives, our governments need to establish rules and regulations to govern commercial activities. As might be expected, businesses are less than enthusiastic about regulations in general, and have a financial interest in opposing actions by governments that affect their international "competitiveness" (they will typically try to pass along any compliance costs to consumers). Conservative columnists and thinktanks tend to see regulation in more black-and-white terms — that is, with revulsion — as a fundamental intrusion into private affairs. This *laissez faire* view plays on common, individual level dislike of being subjected to rules that sometimes do not make sense ("why can't I bring my toothpaste on the plane?"). Moreover, people can forget, and do not have the time (or inclination) to monitor regulatory activities by governments. Over time, business interests can erode away at the foundation of regulations, or evolve around existing regulations (as was the case with the financial crisis).

With the CDSR in hand, the CCPA engaged Environics to poll Canadians about their priorities for regulation. The poll was conducted between April 14 and May 5, 2009, and 2,020 Canadians from across the country interviewed. This is a fairly large sample relative to most polls reported in the media, and as a result we can have a high degree of confidence that results approximate the "real" views of Canadians. It has a margin of error of 2 percentage points, 19 times out of 20. Questions and responses are listed in the Appendix.

It is safe to say that public interest regulation has considerable public support, although there is a small minority who subscribe to the *laissez faire* view of regulation. When asked what the main consideration should be when governments develop regulations, three-quarters (77%) of Canadians chose "protecting Canadians' health and safety, working conditions and the environment" compared to 20% who chose "protecting international competitiveness of Canadian business by keeping costs associated with regulations low" (Question 1). In fact, they are highly distrustful of corporations being left to regulate themselves,

with 84% of Canadians believing corporations "will usually put profit before safety" (4b).

Nine in ten Canadians agreed that "the Canadian government needs to do more to protect our environment, health and safety" (4c). Three-quarters agreed that "corporations have too much influence over how government regulations are set" (4a). And four in five (83%) agreed that "the people who actually inspect and regulate industries in Canada should work for government agencies, not for the industries themselves" (4d).

Interestingly, many Canadians see a positive role for regulation of Canadian companies for international commerce. Two thirds (67%) agreed that "strict government standards and regulation help Canadian businesses compete internationally by ensuring that Canadian products are of a higher quality than those of other countries" (2).

Corporate Interests and the CDSR

While the CDSR makes some polite nods towards the notion of protecting the public interest, at almost every turn those good intentions are undermined by "competitiveness" concerns. Even at the outset of the document, in a list of principles dedicated to the government's "Commitment to Canadians", the principle "promote a fair and competitive market economy" is number two on the list. This juxtaposes with number one, "protect and advance the public interest in health, safety and security, the quality of the environment, and the social and economic well-being of Canadians", which itself is made ambiguous by the inclusion of "economic well-being."

Indeed, any reference to protecting the public good in the CDSR is matched by one referring to economic objectives. Given the choice between public interest regulation, which may entail structural or technological change, and a "competitive" corporate sector, there is good reason to believe that the CDSR will tend to favour the status quo.

The CDSR slants the regulatory process in favour of corporate interests by posing a number of tests to the development of new regulations, to be conducted at the departmental level, and subject to centralized second-guessing by Treasury Board. As part of a triaging process, regulatory proposals are to be screened at "an early stage", the criteria for which include four broad factors upon which departments are to assess regulatory proposals:

- potential impact of the regulation on health and safety, security, the environment, and the social and economic well-being of Canadians;
- cost or savings to government, business, or Canadians and the potential impact on the Canadian economy and its international competitiveness;
- potential impact on other federal departments or agencies, other governments in Canada, or on Canada's foreign affairs; and
- degree of interest, contention, and support among affected parties and Canadians. (Section 3.1)

Thus, right up front the need for public interest regulation is pitted against economic considerations, and perceptions that vaguely defined "competitiveness" will be affected could be sufficient to kill a new regulation. Because "competitiveness" is not defined — there is no measure of competitiveness in economics; it is a moral value that has no financial value — the CDSR obsession with "competitiveness" makes regulations in the public interest subject to criteria that are open to interpretation. There is substantial scope for proposed regulations to be second-guessed, watered down or rejected outright in the face of a targeted corporate lobbying effort.

Similarly, impacts on "Canada's foreign affairs" would likely include adverse impacts on the US, China and other foreign investors in

Canada. The final bullet point in Section 3.1 reinforces the previous two, suggesting that major corporate opposition to a proposed measure might be enough to kill it. The CDSR requires that departments and agencies must identify "interested and affected parties…providing them with opportunities to take part in open, meaningful, and balanced consultations *at all stages* of the regulatory process" (Section 4.1, emphasis added). This ensures that the foxes have a clear voice in henhouse security measures.

Putting specific economic interests on an equal footing with public interest considerations, as embedded in this process, will inevitably change the nature of any regulations passed, with "soft" regulations, such as labeling requirements or vaguely-defined "performance measures", preferred over "hard" regulations that ban products or restrict technology options. The Environics poll specifically tested the use of labeling, and found that 72% of Canadians agreed that there needs to be "regulations around product safety that go beyond labeling" (3).

Risk vs Precaution: The Burden of Proof

Two stylized approaches to regulation are "precautionary" and "risk management" approaches. The precautionary approach basically says that in the face of scientific uncertainty err on the side of caution with respect to health and the environment. For example, it is better to forego uncertain health and economic benefits of a new drug than expose people to a potentially harmful substance. This approach places the burden of proof on industry to ensure safety before a product comes onto the marketplace.

The risk management, or risk assessment, approach defers judgment unless risks are sufficiently large, based on a rigorous, scientific demonstration of harm. This places the burden of proof in the opposite place — on the regulator. With this approach it may take decades for enough evidence to accumulate to a point at which strong regulations would be invoked. Even when there is widespread consensus within the scientific community, as in the case of climate change, a handful of well-funded dissenters can stall action for years.

The public are widely supportive of precaution, according to the Environics poll. Three-quarters (76%) agreed that "governments should impose stricter safety regulations if they have reasonable cause for concern, even if there is no conclusive scientific proof" (4e).

The CDSR, however, is clearly in the risk management camp. Departments and agencies must demonstrate "through the best available evidence and knowledge that government intervention is needed" (Section 4.2). The CDSR requires extensive documentation in this regard. And while the CDSR makes a nod towards precaution as acceptable "when there is risk of serious or irreversible harm", it does so in a way that is essentially a restatement of the risk management philosophy. The CDSR refers departments and agencies to the federal *Framework for the Application of Precaution in Science-Based Decision Making About Risk*, which narrowly redefines precaution in terms of risk management.

In essence, precautionary approaches are against the spirit of the CDSR due to the hurdles posed by scientific certainty, and how they bias decision-making against effective regulation. The CDSR places pressure on federal departments to use non-regulatory measures wherever possible, and to bring forward regulations only to the extent necessary to achieve objectives. The overall approach is antagonistic to regulation, with departments and agencies responsible for "assessing the effectiveness and appropriateness of regulatory and non-regulatory instruments for achieving policy objectives" (Section 4.4).

In addition, regulations are to be seen as part of a "life-cycle" approach, meaning regular review of regulations and sunset clauses so that any regulations that survive the large hurdles being implemented would be subject to a process where

they are constantly on parole and must continue to justify their existence. Once developed, departments and agencies are "responsible for ensuring that regulation continually meets its initial policy objectives and for renewing regulatory frameworks on an ongoing basis" (Section 4.6).

This approach means all existing regulations will be subject to CDSR scrutiny over time, and could lead to major changes in existing public interest regulations away from the public eye. One such leaked proposal, to hand over food inspection powers to industry, became a major story in the summer of 2008, leading to the firing of an employee who found a classified document on a publicly accessible server, and raised a flag with his union.[3]

Costs and Benefits of Regulation

The CDSR formalizes much of the above in requirements for cost-benefit analysis of proposed regulations. While this may seem straightforward in the abstract, in practice cost-benefit analysis tends to overstate the costs of compliance from businesses while understating the benefits, thereby biasing decision-making away from strong regulation.

The CDSR requires that departments and agencies "identify and assess potential positive and negative economic, environmental, and social impacts on Canadians, business, and government of the proposed regulation and its feasible alternatives" and at a second stage that the chosen option:

- limit the cumulative administrative burden and impose the least possible cost on Canadians and business that is necessary to achieve the intended policy objectives;
- consider the specific needs of small business and identify the least burdensome but most effective approach to addressing these needs;
- ensure that regulatory restriction on competition is fair, limited, and proportionate to what is necessary to achieve the intended policy objectives;
- prevent or mitigate adverse impacts and enhance the positive impacts of regulation on the environment, the health and safety of Canadians, and competitiveness, trade, and investment;
- identify the scope and nature of residual adverse environmental effects after mitigation and enhancement strategies have been considered; and
- identify necessary follow-up measures to track environmental effects over time. (Section 4.4)

Of these six considerations, the first four directly reference perceived impacts on business, and give them equal or better footing than the core objective of protecting the public interest. This is challenging as costs are identifiable in a quarterly financial statement, while benefits can be spread over decades and across a wide population.

Empirical estimates of costs and benefits are very hard to come by, plagued by gaps in data and differences in methodological approaches and assumptions. On the cost side, estimating costs often requires accepting estimates from the very industry being regulated — not an unbiased source of information because companies have an incentive to overstate their estimates. Numbers can be hard for governments to verify, and anticipated costs of complying with regulation are often much higher than the actual costs incurred.

Regulation is perceived to increase costs for business, so we should expect business to argue against regulation (though these costs may be passed along to consumers, workers and investors). In many cases, however, the purpose of regulation is to internalize an externality — as incorporated, or example, into the principle of

"polluter pays" — so from this perspective regulation is not imposing additional costs on business but preventing them from externalizing some of their costs onto third parties, consumers, the environment, or workers. In any event, as long as regulations are applied evenly across all participants a level-playing field can be established that ensures a high standard of responsible behaviour.

Benefits of regulation can be extremely difficult to quantify in dollar terms, such as the benefit of clean air and water, additional years of life, or better heath. Some commentators argue that it is immoral and impossible to assign dollar amounts to death and reduced quality of life. Ackerman and Heinzerling (2004) argue that estimates of the value of human life are often derived from questionable methodologies, and pit human lives against potential costs to business from complying, thereby putting an artificial constraint against regulation.

Ultimately, regulators may also be too conservative in estimating costs and benefits prior to implementation. A former administrator with the US Environmental Protection Agency found that the agency has consistently over-estimated economic costs to business and underestimated benefits to the public (Reilly 2003). The widely spread beneficiaries of regulation tend to lack the resources to participate in any assessment of costs and benefits, whereas well-endowed corporate interests can bring to bear all sorts of unverified "evidence" in addition to threats or political pressure.

Yet, even with the appropriate caveats about measurement, reviews have shown benefits of regulation to far exceed costs. Responding to requests by Congress in the 1990s, the Office of Management and Budget (part of the Executive Office of the President of the United States) now performs an annual study of the costs and benefits of regulation based on reviews of the academic literature on costs and benefits of federal regulation to the US economy and society, coupled with detailed department-level data. The OMB consistently estimates benefits to regulation several times larger than costs.

No such cost-benefit exercise has been undertaken for Canadian regulations as a whole, although cost-benefit analysis is now part of the process for the development of new regulations. But given the US example, it is likely that in Canada, benefits also greatly exceed costs, even with the difficulties mentioned above in making estimates. The CDSR thus risks the loss of benefits to Canadians far and wide arising from regulation, even when they would, if implemented, exceed the costs for particular companies and industries (these costs would be passed along to consumers in any event).

Domestic vs International

A key feature of the CDSR is to bring Canada's regulatory regime into line with the government's international commitments as reflected in the NAFTA and WTO Agreements (see Lee and Campbell, 2006, for an overview). Departments contemplating new regulations are obliged to consult with International Trade Canada to ensure compliance with these agreements. Regulations must also be designed with an objective of "limiting the number of specific Canadian regulatory requirements or approaches to instances where they are merited by specific Canadian circumstances" (Section 4.4).

The public opinion polling yields an anomalous result on this issue, with support for international trade rules taking precedence over domestic regulation. This is reflective of a paradox in public opinion polling, identified by Wolfe and Mendelsohn (2004), that finds support among Canadians for international trade rules but wariness about "globalization". Thye comment that "Canadians are extremely reluctant to cede sovereignty to international institutions on three issues: standards for social programs, standards for the workplace, and standards for

clean drinking water", and go on to argue that this may represent a form of social compromise where "social security in the form of the welfare state and decent working conditions have been judged to be the key responsibilities of national governments, and so long as these two pillars were protected, states were free to pursue trade liberalization internationally." Another possibility is that the public perceive stronger minimum regulatory standards in other countries, that if embodied in international trade agreements would lead to better regulation in the Canadian marketplace (although this may apply more to advanced countries than developing ones). The relationship between international trade rules and regulation is complicated, and this result (notably one of the weakest in the survey) reflects a benign view of international trade agreements that lacks the important critique made by progressives over the years that these agreements, in practice, are about the creation and codification corporate rights to move across borders with minimal government interference.

Interestingly, while the CDSR makes explicit mention of the WTO and NAFTA, it does not mention other international treaties to which Canada is a signatory. These include treaties such as the Biosafety Protocol, the Kyoto Protocol, the Montreal Protocol, Basel Convention, and the Cultural Diversity Treaty, not to mention numerous United Nations charters. While environmental concerns are at least given a passing mention in the CDSR, cultural objectives are completely absent.

Transparency and Accountability

With the CDSR, regulatory decision-making becomes ever more opaque, with screening of regulations done at the departmental level before anything gets to the cabinet table. There is little opportunity for the public to engage in regulatory decision making; meanwhile, corporate entities can allocate substantial resources at every stage in order to protect their economic interests.

In addition to requirements that departments and agencies thoroughly vet regulatory proposals along the lines stated above, the entire process is centralized through Treasury Board, which has a mandate to "review regulatory proposals, challenge departments and agencies on the quality of regulatory analysis, and advise them when the directions set out in the Directive have not been met" (Appendix A).

Minimally, regulatory decision-making should be transparent to Parliament, with a role of parliamentary committees to ensure the efficacy of regulatory approaches, and that they meet the core public policy objectives. Moreover, public scrutiny should be part of an effective regulatory system.

Conclusion

The CDSR, as outlined above, defines a weakened federal regulatory process in Canada. Since it has only been in place for a relatively small amount of time, it is difficult to assess what impact it has had to date. Furthermore, over time all government regulations already in place, effective or not, will have they day in court before the tribunal of the CDSR.

The CDSR pits the public interest against corporate interests, as a central component of regulatory policy development, and does so in a highly centralized framework that will make it much more difficult to enact effective public policies in the future. The new regulatory policy is anchored in an ideological approach to regulation that places the onus on government to prove harm, not on the corporate sector to prove its products and manufacturing processes are benign. Rather than taking sensible, precautionary measures when there is good reason to expect adverse effects, the federal approach demands compelling evidence of harm before action can

be taken, thus putting at risk health, safety and environmental concerns.

Minimally, the CDSR should be expected to place a 'chill' over the development of new public interest regulation, and to greatly water down any measures that do get considered. Further research is required to analyze the impact of the CDSR on regulatory decision-making in key areas such as public health, environment, agriculture and food, transportation and telecommunications.

Government must state unequivocally that the first obligation of regulation is to protect citizens' health, safety and the environment and restore the primacy of the precautionary principle. It should reject the premise of "balancing" protection against business costs under a risk assessment framework that perverts the precautionary principle. Pragmatic regulatory approaches should always consider compliance costs, but these should never be on a par with, or take precedence over, protection considerations.

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Notes

1 This paper updates a detailed review of federal regulatory policy conducted by Lee and Campbell, 2006. At the time what became the CDSR was in draft form and was known as the Government Directive on Regulating, part of a Smart Regulation Action Plan launched by the previous Liberal government.

2 Auditor General of Canada, 2000, 24.94.

3 Reported by Canadian Press, August 21, 2008, "Tories coy about plan to shift food inspection powers to industry", http://canadianpress.google.com/article/ALeqM5gC9NkqspB-01I8yAAGcJOeLk4IgA

APPENDIX

Environics Focus Canada Polling Questions and Results

1. When governments develop new regulations, what should be their main consideration?

77% Protecting Canadians' health and safety, working conditions and the environment

20% Protecting the international competitiveness of Canadian business by keeping costs associated with regulations low."

3% Do not know

2. Some people say that in order for Canadian businesses to be able to cut costs and compete internationally, government regulations need to be relaxed. Other people say that strict standards and regulation help Canadian businesses compete internationally by ensuring that Canadian products are of a higher quality than those of other countries. Which of these town point of view is closest to your own?

67% Strict standards and regulation help Canadian businesses compete internationally by ensuring that Canadian products are of a higher quality than those of other countries

28% In order for Canadian businesses to be able to cut costs and compete internationally, government regulations need to be relaxed

4% Do not know

3. When it comes to consumer products, some people say that government regulations should be limited to providing people with information through product labels. Other people say that there need to be regulations around product safety that go beyond labeling. Which of these two points of view are closest to your own?

72% There need to be regulations around product safety that go beyond labeling

26% Government regulations should be limited to providing people with information through product labels

2% Do not know

4. Please tell me if you strongly agree, somewhat agree, somewhat disagree, or strongly disagree with each of the following statements about government regulation of business.

a) Corporations have too much influence over how government regulations are set.

41% Strongly agree
35% Somewhat agree
15% Somewhat disagree
6% Strongly disagree
4% Do not know

b) When corporations are left to regulate themselves, they will usually put profit before safety.

57% Strongly agree
27% Somewhat agree
10% Somewhat disagree
5% Strongly disagree
1% Do not know

c) The Canadian government needs to do much more to protect our environment, health and safety.

63% Strongly agree
27% Somewhat agree
7% Somewhat disagree
2% Strongly disagree
1% Do not know

d) The people who actually inspect and regulate industries in Canada should work for government agencies, NOT for the industries themselves.

57% Strongly agree
27% Somewhat agree
10% Somewhat disagree
5% Strongly disagree
2% Do not know

e) Governments should impose stricter safety regulations if they have reasonable cause for concern, even if there is no conclusive scientific proof.

36% Strongly agree
40% Somewhat agree
15% Somewhat disagree
7% Strongly disagree
2% Do not know

f) It is more important for the government to adhere to provisions in international trade agreements signed by Canada than it is to regulate industry.

19% Strongly agree
46% Somewhat agree
21% Somewhat disagree
8% Strongly disagree
7% Do not know

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