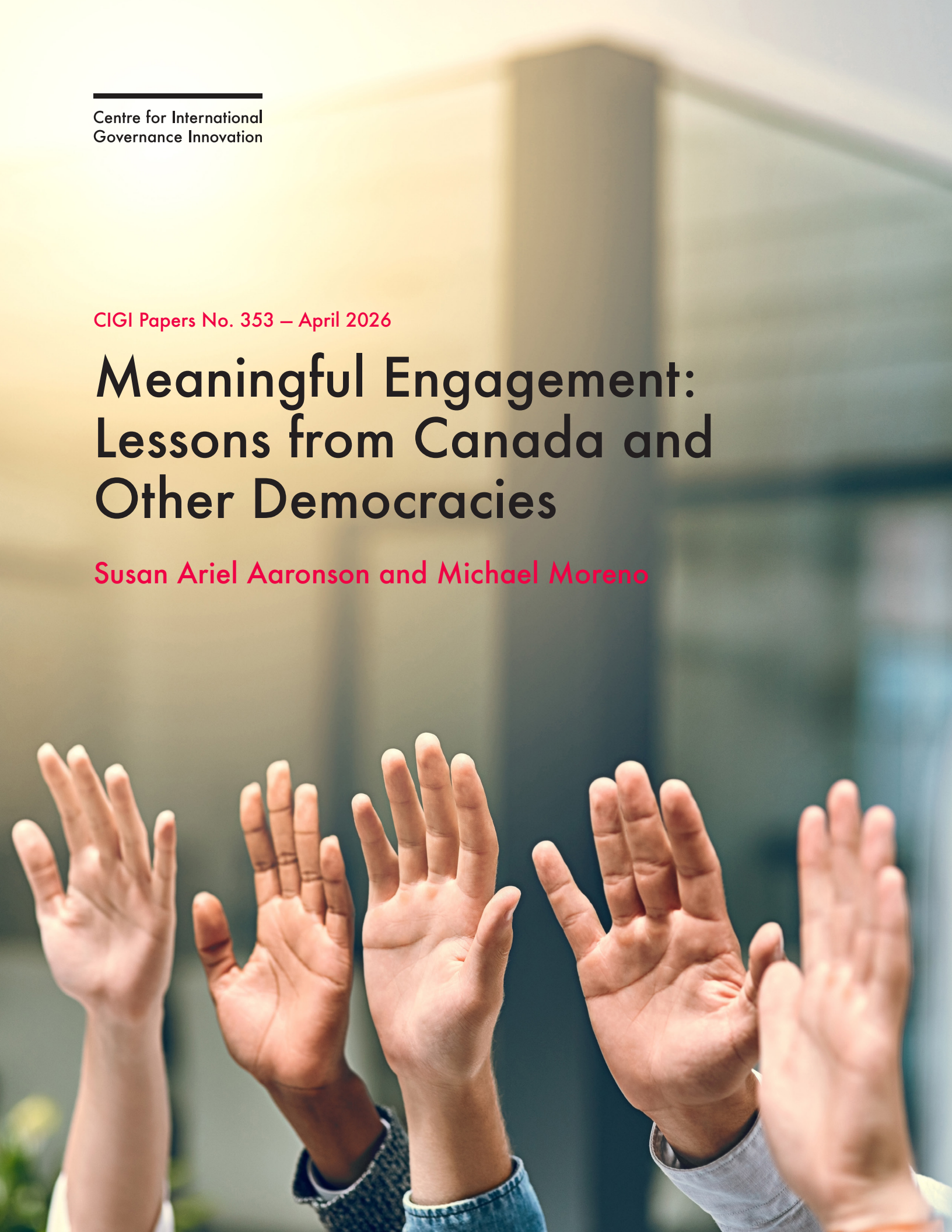
Centre for International
Governance Innovation

CIGI Papers No. 353 – April 2026

Meaningful Engagement: Lessons from Canada and Other Democracies

Susan Ariel Aaronson and Michael Moreno



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67 Erb Street West
Waterloo, ON, Canada N2L 6C2
cigionline.org

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About the Authors

Susan Ariel Aaronson is a CIGI senior fellow, research professor of international affairs at George Washington University (GWU) and co-principal investigator with the NSF-NIST Institute for Trustworthy AI in Law & Society, where she leads research on data and AI governance. She is also a GWU Public Interest Technology Scholar and a Balsillie Tech Scholar. Her research interests relate to the relationship between economic change, human rights and good governance.

Susan directs the Digital Trade and Data Governance Hub at GWU. The Hub was founded in 2019 and educates policy makers, the press and the public about data governance and data-driven change through conferences, webinars, study groups, primers and scholarly papers. It is the only organization in the world that maps the governance of public, proprietary and personal data at the domestic and international levels. The Hub's research has been funded by foundations such as Ford and Minderoo.

Susan directs projects on defining AI protectionism; how governments may incentivize more accurate, complete and representative data sets; and AI overcapacity. She regularly writes op-eds for *Barron's*, *Fortune* and other publications, and has been a commentor on economics for NPR's *Marketplace*, *All Things Considered* and *Morning Edition*, and for NBC, CNN, the BBC and PBS.

Previously, Susan was a guest scholar in economics at the Brookings Institution (1995–1999) and a research fellow at the World Trade Institute (2008–2012). Susan was also the Carvalho Fellow at the Government Accountability Project and held the Minerva Chair at the National War College. She has served on the business and human rights advisory board at Amnesty International and the advisory board of Human Rights under Pressure, a joint German and Israeli initiative on human rights.

In her spare time, Susan enjoys triathlons and ballet.

Michael Moreno is a former AI and data governance researcher at the Digital Trade and Data Governance Hub at George Washington University, where he supported the NSF-NIST Institute for Trustworthy AI in Law & Society.

Before joining the Hub, Michael worked across the public and private sectors, including roles at the US Bureau of Reclamation and at Character.AI.

Michael holds a B.A. in Latin American studies and political science from Macalester College and an M.A. in international affairs from George Washington University.

Executive Summary

Canadian government officials want artificial intelligence (AI) to be deployed responsibly in Canada. This paper examines Canada's consultation process on AI governance and compares it to AI governance consultations in Australia, Colombia and the United States. The authors argue that given the broad societal challenges presented by AI, democratic nations must find ways to meaningfully engage with their citizens on AI governance. While Canadian officials are working to improve the process of seeking public input, Canada and other democracies can do more to inform, involve and collaborate with their citizens on AI governance. The authors recommend that democratic governments, including Canada, take the following actions:

- Build a base of common knowledge about AI to support informed participation.
- Recognize public participation in AI governance as both a policy problem and a marketing problem. Enlist the help of a wide range of civil society groups on outreach.
- Establish an "always-on" portal where citizens can ask questions and provide feedback about AI policies. Designate staff to serve as citizen guides and advocates who could respond to concerns submitted in the portal.
- Designate an ombudsperson at every government department to respond to public concerns over policies and practice related to AI. The ombudsperson should investigate citizen complaints and resolve them.

Overview

On September 26, 2025, Evan Solomon, Canada's minister of artificial intelligence and digital innovation, announced that his agency sought public input on an AI strategy (Innovation, Science and Economic Development Canada [ISED] 2025c). Members of the public would have 30 days (a "sprint") to provide feedback to ISED on key issues such as:

- attracting AI research and talent;
- encouraging broader AI adoption across industry and government;
- scaling Canadian AI champions and attracting more investments;
- building safe AI systems; and
- strengthening public trust in AI.

The Government of Canada stated that it wanted to hear from a wide range of Canadians, inviting "founders, researchers, workers, creators, students, public servants and community voices" to weigh in (ISED 2026, 3). To facilitate broad participation, the government website provided an overview of background materials and offered constituents a few options: provide comments through the dedicated portal, email ISED or respond to a short survey. ISED promised to report on its findings from the consultation in November 2025 and show how it was guided by Canadians (ibid.). Government officials made it clear — public input was essential.

However, not all Canadians believed such an abbreviated process could yield meaningful public input. In October 2025, as the sprint deadline neared, 41 Canadian organizations and 123 citizens sent a short public letter to the minister of industry, the minister of artificial intelligence and digital innovation, and the Government of Canada's AI Strategy Task Force. The signatories acknowledged that Canadian officials needed feedback on their approach to nurturing and governing AI, but they also argued that the process seemed unfair and precooked (Lau 2025).

The letter's signatories claimed to represent "civil society, human rights, and civil liberties organizations, academics, advocates, and representatives of equity-seeking communities" (British Columbia Civil Liberties Association 2025). They rejected "the deeply misguided and wrongheaded approach to public consultation demonstrated by the government's thirty-day 'national sprint' on Canada's artificial intelligence ('AI') strategy....We jointly refuse to participate in and validate what appears to be a disingenuous attempt to claim public legitimacy for an outcome already decided from behind closed doors" (ibid.). Instead, the signatories recommended that the government:

- → Extend the consultation deadline from one month to six months (until February 2, 2026), to allow more time for, and a greater number of, comments.
- → Reconstitute the task force with members better equipped to confront the ongoing threats of AI to people and communities.
- → Rewrite the survey into a more legitimate and unbiased consultation instrument (ibid.).

The letter writers had a point. In a multi-country study of public consultation processes, the Organisation for Economic Co-operation and Development (OECD) found that when such a process is rushed, people cannot participate effectively (OECD 2025b, 35). The Government of Canada released its summary of the AI strategy responses in February 2026, beyond this paper's period of study.

This paper examines Canada's consultation process on AI governance and compares it to those of other democratic governments the authors studied over the past two years — Australia, Colombia and the United States. The authors' objective is not to criticize any government, but to identify systemic challenges that democracies face when seeking public input on AI. The authors then suggest new strategies to build a more effective consultation process.

There are several reasons why democracies should engage with the broader public on AI governance. First, AI is built on various types of data, such as personal data and proprietary data. Users constantly interact with and refine various AI systems as they engage in their day-to-day activities (Sloane et al. 2022). Consequently, users have a major stake in the design and governance of AI. Second, as AI systems evolve and as adoption increases, the public must shape AI to ensure that it reflects societal norms. Third, AI is a complex and frequently changing technological system with far-reaching societal implications. Hence, officials must engage their citizens in collaborative, ongoing and responsive consultations to build and sustain public trust. Otherwise, AI will pose a democracy problem (Stilgoe 2024).

As noted in the authors' earlier case studies,[1] Canadian officials primarily relied on speeches, government websites and formal calls for comment to solicit public input on AI.[2] These approaches failed to generate participation from a broad or diverse cross-section of the citizenry. Canadian authorities, like their counterparts elsewhere, provided background materials, but they did not take sufficient steps to ensure that citizens had the information they needed to understand their stakes in the consultation.

As a result, like in the other countries, respondents included academic researchers, industry representatives and business leaders. These individuals and groups possess technical expertise and/or have a direct stake in AI development and deployment. These individuals and groups can offer valuable insights, but their outsized influence on the process raises concerns about representativeness and balance (Aaronson 2025; OECD 2025b).

However, in contrast with the other countries the authors studied, Canadian officials have explicitly acknowledged that existing consultation practices require modernization. At the request of the Treasury Board of Canada, the Morris J. Wosk Centre for Dialogue at Simon Fraser University developed the Maturity Model for Public Participation, a framework intended to help government agencies assess and strengthen their capacity for inclusive and effective engagement.

This paper begins with an overview of Canada's approach to public consultations. It then outlines the methodology and analyzes the authors' findings. The authors then compare Canada to their findings on Australia, Colombia and the United States. The authors conclude with recommendations for rethinking AI consultations to ensure that AI governance is democratically determined.

1 See Aaronson (2025); Aaronson and Moreno (2025); Aaronson and Zable (2023).

2 Global Affairs Canada also employs targeted emails.

Canada's Approach to Participatory Governance

Canada is widely regarded as a global leader in open and participatory government (OECD 2023a).[3] The OECD found that trust and satisfaction with public services facilitate effective governance, and correlate with high rates of compliance with policies, participation in public life and social cohesion (OECD 2023b, 1). Although Canada ranks as having higher levels of trust in the government than many other OECD member states, the country does not have equally high levels of participation in governance. According to the Open Government Partnership, "The OECD's 2024 Trust Survey found that only 40% of Canadians feel that the Canadian political system allows them to have a say in what government does, or that the government responds to input from consultations. Furthermore, the Trust, Information, and Digital Ecosystems Study (TIDES), conducted by the Privy Council Office (Government of Canada), reports that only 12% of Canadians say that people like them have a significant influence on politics."[4] Put differently, Canadians are signalling that they cannot "meaningfully engage"[5] with government officials (OECD 2025b; Wilton 2019; Gubbles and Trew 2023).

Public engagement is meaningful when people are aware of opportunities to participate in consultations, have the information they need to contribute and believe their input will be "used to shape government decisions" (Wilton 2019). The International Association for Political Participation (IAP2) identifies this as a core value. It defines meaningful participation as ensuring that the public has a real, tangible influence on the ultimate decision, providing participants with sufficient information to engage, and informing participants about how their input affected the final decision or issue. Hence, the OECD suggested that the Canadian government must find new ways to encourage broader and more diverse participation in governance (OECD 2023b, 3).

In 2024, the government adopted a Trust and Transparency Strategy. According to Anita Anand, then president of the Treasury Board, "Public trust in government is essential for a healthy and functioning democracy, particularly as we face an unprecedented surge in misinformation and disinformation....We must take additional action to ensure the Government of Canada continues to meet citizen expectations for transparent, accountable, and participatory government."[6] She then announced Canada's Trust and Transparency Strategy, which establishes a whole-of-government framework for strengthening public trust.

The strategy stated, "The public should find it easy to be involved and participate in government decisions and initiatives....An equitable, inclusive and protected civic space is a key enabler of public trust and participatory democracy."[7] To meet this objective, the Board recommended that Canadian officials:

- assess the effectiveness of current practices and identify opportunities for improvement;
- raise public awareness of opportunities to participate in federal government policy and decision making; and
- facilitate access to the data and information resources necessary to support public participation in federal government policy and decision making.[8]

Thus, the Treasury Board worked with the Morris J. Wosk Centre for Dialogue to create the Maturity Model for Public Participation. A maturity model is a reference instrument for assessing an entity's transition toward a given objective (OECD 2023a, 48). It was designed to enhance the capacity of governments and organizations to meaningfully integrate public participation in the development of policies and programs. Governmental agency users are guided through the process of assessing their current public participation capacity and identifying tools and

3 See www.international.gc.ca/world-monde/international_relations-relations_internationales/ogp-pgo/index.aspx?lang=eng.

4 See www.opengovpartnership.org/the-open-gov-challenge/canada-create-a-tool-to-assess-and-improve-public-participation/.

5 "Meaningful engagement" is defined as the government effectively publicizing consultations to reach a broader, more representative audience; ensuring that public participation is continuous and trustworthy rather than episodic; and developing mechanisms to ensure the public feels heard.

6 See www.canada.ca/en/government/system/government-wide-reporting-spending-operations/trust-transparency/government-canada-trust-and-transparency-strategy.html.

7 Ibid.

8 Ibid.

resources to strengthen priority areas, providing a unified approach to planning and implementation.[9]

To date, however, there is no publicly available evidence that the Maturity Model has been operationalized or used by Canadian federal departments or other governments. According to the Treasury Board of Canada Secretariat and the Open Government Partnership, the model is slated for phased testing beginning in 2026 through a multi-year pilot program involving a small number of departments.[10]

The Maturity Model recommends that officials attempt to change their culture to be more supportive of participation, identify barriers to participation and build sustained relationships with community organizations that may not consistently participate in calls for comment (Armos 2025). However, the Maturity Model does not address three fundamental questions:

- how to get the word out to a broader, more representative audience;
- how to ensure that public participation is not a once-a-year occurrence but is constant and trustworthy; and
- how to help the public feel heard (for example, by policy makers showing they are responsive).

Methodology

During 2023–2025, Canadian officials held five consultations related to AI. Canadian officials provided names, descriptors and comments for two of these consultations on artificial intelligence and competition in 2024 and on copyright in the age of generative artificial intelligence in 2023–2024 (ISED 2023a). The details in these papers allow the authors to compare Canada's approach to those of other democracies they studied. Nonetheless, the authors acknowledge that the sample size of two limits the representativeness of their findings.

As the authors responded to reviewer comments, the Government of Canada released its summary of the AI strategy responses in February 2026. The authors believe this consultation is noteworthy and merits a full analysis, but the government responded after their period of study. The consultation received an extraordinary 11,384 total responses. However, 8,221 of these responses were, according to ISED, "in progress" or not submitted, and thus cannot be assessed. The government-reviewed 3,163 were completed submissions. Regarding participation type, 9,313 respondents (82 percent) indicated they were commenting as individuals; 1,911 (17 percent) were responding on behalf of an organization; and 160 (one percent) did not provide an answer (ISED 2026).

The sectoral breakdown of respondents was as follows:

- individuals (52 percent);
- firms (20 percent);
- academics/think tanks/university research groups/research institutions and universities (13 percent);
- government (four percent);
- business/trade associations (three percent);
- non-profits/non-governmental organizations (NGOs)/charities (two percent); and
- other (six percent) (ibid.).

The data set provided by ISED (ibid.) was not consistent with the authors' other consultations. Hence, the authors could not fully include it in their analysis.

The authors relied upon the same methodology that they used to assess Australia, Colombia and the United States. This methodology enables the authors to characterize and compare national approaches to seeking public comment (Aaronson and Zable 2023, 7).

The authors' analytical process begins by creating a list of everyone who responded to the call. The authors then conducted a landscape analysis, dividing

9 See www.opengovpartnership.org/the-open-gov-challenge/canada-create-a-tool-to-assess-and-improve-public-participation/.

10 The Maturity Model pilot program is planned to begin in 2026, with the launch of an initial cohort of two–four federal departments that will use the model to assess their public participation capacity, identify priority areas for improvement and develop detailed action plans, supported by ongoing capacity-building activities and evaluation. In 2027, the program is expected to expand to a second cohort of departments, continue evaluation and reflection activities, and produce policy analysis and briefing materials aimed at influencing executive-level decision making. By 2028, the Treasury Board of Canada Secretariat and the Open Government Partnership plan to consolidate lessons learned from two years of pilot implementation, refine the model based on user feedback, disseminate findings through webinars and case studies, and support broader mobilization of public participation tools across government.

the respondents into groupings that reflected their own descriptions as delineated in their comments or on a relevant webpage that might describe their occupation and/or interests. The researchers' analysis is focused less on the comments, per se, and more on the process of obtaining and incorporating those comments into a report on those consultations. The researchers then address five key questions:

- Who participated?
- What materials did the government provide to prepare the public to give informed advice?
- Did policy makers attempt to ensure a broad cross-section of people knew about and could comment on the proposed policy?
- How and when did the government engage with its citizens?
- Did the government provide evidence that it made use of the feedback it received?

The authors next used the IAP2 spectrum to characterize each case study's level of political participation. IAP2 is an international association that provides public participation practitioners around the world with tools, skills and training to advance and extend the practice of public participation (see Figure 1). While the spectrum is used here as a descriptive tool to categorize engagement, the authors recognize that not all decisions are suited to high levels of public participation.

The findings and background data are available on the Digital Trade and Data Governance Hub research website.[11]

Figure 1: IAP2 Spectrum of Public Participation

IAP2 Spectrum of Public Participation

IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

INCREASING IMPACT ON THE DECISION

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Source: Figure reprinted with permission from IAP2.

11 See https://datagovhub.elliott.gwu.edu/deaf-ears-in-canada/.

Summary of Findings from the Consultations

Canadian officials designed these consultations to examine the context for rulemaking or potential policies. The Competition Bureau launched a public consultation (March 20–July 7, 2024) to deepen its understanding of AI market dynamics and potential anti-competitive conduct. Separately, ISED conducted a consultation on copyright in the age of generative AI (October 2023–January 2024) to better understand generative AI's impact on copyright and the marketplace, responding to creators' concerns about uncompensated use of their works and the AI industry's concerns about legal uncertainty. ISED also received about 1,000 responses to the questionnaire. The questionnaire focused on highly technical and legal issues, such as the collection and use of copyright-protected content in training data sets, liability for infringing AI-generated works, and the licensing of text- and data-mining (TDM) activities (ISED 2025a). As a result, the questionnaire was primarily accessible to firms, rights holders, legal experts and other organized stakeholders rather than members of the general public (ibid.).

Who Responded to the Calls for Comment?

To effectively answer the government's questions, respondents needed to address highly technical and legal-use issues. Thus, the published responses to both calls for comment tended to be from organizations with a direct stake in the governance of competition and/or copyright.

In the competition consultation, the authors found it difficult to fully delineate the composition of respondents. The government published 103 written submissions from organizations and expert stakeholders but withheld 1,000 questionnaire responses from individual participants. Therefore, the authors' analysis focuses only on the 103 public submissions.

Please note that respondents were categorized based on how they self-identified in their submission. Individuals were coded as such only when submissions were made in a personal capacity and did not claim to speak on behalf of an institution or organization. Academic experts submitting were categorized under "think tanks/university research groups/research institutions and universities" rather than as individuals. Where ambiguity existed, the authors relied on the submitters' stated affiliations and reviewed professional roles to determine the most appropriate category. Table 1 illuminates who responded to the copyright consultation.

On AI and competition, Canada held a call for comment on competition policy. The Competition Bureau received 28 submissions but only made 25 public. The bureau noted on its website that "each submission received by the Bureau will be published on its website unless the provider requests that it be kept confidential" (Competition Bureau Canada 2024a). Table 2 illuminates who responded to the competition consultation.

The copyright consultation attracted a larger group of respondents. According to the government's "What We Heard Report," approximately 1,000 interested Canadians submitted responses to an online questionnaire, and the government received an additional 103 submissions from organizations and expert stakeholders across various industries, which were made publicly available online (ISED 2025b). The government further noted that most questionnaire respondents were individual creators, although the exact number and sectoral breakdown of these individual participants cannot be independently verified because the questionnaire responses were not published.

In contrast, the competition consultation received 28 publicly available submissions from a narrower group of domestic and international stakeholders, including individuals, think tanks, academics, industry associations and technology firms (Competition Bureau Canada 2025). Although the copyright consultation received significantly more responses overall, participation remains small as a percentage of the Canadian population. Because the authors' analysis is limited to consultations in which at least some responses were made public, they cannot determine whether the government seeks broad-based public participation or primarily input from directly affected and knowledgeable stakeholders.

Table 1: Canada (Copyright) Respondent Breakdown

Respondent	Percentage of Total	Count
Individuals	13%	13
Firms	9%	9
Think tanks/university research groups/research institutions and universities	12%	12
Non-profits/NGOs/charities	18%	19
Business/trade associations	46%	48
Other	1%	1
Government	1%	1
Total		103

Source: Table by Michael Moreno.
Note: This breakdown is of the 103 responses made public by the Canadian government and does not include the 1,000 questionnaire responses the government said it received.

Table 2: Canada (Competition) Respondent Breakdown

Respondent	Percentage of Total	Count
Individuals	8%	2
Firms	28%	7
Think tanks/university research groups/research institutions and universities	20%	5
Non-profits/NGOs/charities	16%	4
Business/trade associations	28%	7
Other	0%	0
Government	0%	0
Total		25

Source: Table by Michael Moreno.
Note: While the reports state the bureau received 28 submissions, only 25 were officially released.

Demographics of Input Respondents

The copyright and competition calls for comment were led by different federal institutions and had significantly varied results and participant composition. ISED offered the public several different ways of providing feedback on potential revisions to Canadian copyright policy. First, ISED provided an online questionnaire, which the authors did not include in their analysis as the responses were not made public. ISED also organized virtual round tables, where the public could respond to a published discussion paper (ISED 2025b). The authors could only analyze written submissions that were published online by ISED. Of the 103 submissions, business/trade associations made up 46 percent; non-profits/NGOs/charities, 18 percent; think tanks/university research groups/research institutions and universities, 12 percent; individuals, 13 percent; firms, nine percent; government, one percent; and other, one percent. However, since the government published only the organizational and expert-stakeholder submissions, the authors cannot determine the exact number of participants and the sectoral breakdown of the other individuals who participated in the consultation. In addition, 62 stakeholders participated in seven round tables that brought together representatives from cultural and technology industries, public interest groups, Indigenous communities, legal practitioners and scholars (ISED 2025b). However, the government released no further participant information, preventing the authors from assessing who attended. Therefore, the authors could not determine who participated and if this was a representative sample.

The Competition Bureau only provided the public with the ability to comment in response to its discussion paper published online. The Competition Bureau Canada (2025) received 28 submissions from a mix of domestic and international stakeholders; however, the Canadian government published only 25. Of the 25 submissions, firms and business/trade associations made up 28 percent; think tanks/university research groups/research institutions and universities, 20 percent; non-profits/NGOs/charities, 16 percent; and individuals, eight percent. This respondent breakdown reveals a more specialized and expert-driven process, with fewer opportunities for broad public engagement.

In both examples, the government received input only from those directly affected by the potential issues, such as creators, copyright holders, lawyers and so forth.

What Materials Did the Government Provide to Prepare the Public to Give Informed Advice?

For each consultation, Canada provided its citizens with materials to ensure they had sufficient knowledge to comment on related AI policies. ISED released a paper titled "Consultation on Copyright in the Age of Generative Artificial Intelligence," which outlined the purpose of the consultation: to examine how recent advances in generative AI affect Canada's creative industries, evaluate the economic implications of these technologies, and determine whether amendments to the Copyright Act are needed to protect creators while fostering innovation (ISED 2023a).

Additionally, the consultation paper presented 21 questions and grouped the major consultation themes into three categories:

- TDM and the training of machine-learning models;
- the increasing capacity of AI systems to generate or assist in the production of creative outputs, including text, images and music; and
- the use and commercialization of AI systems and the liability for any infringement that occurs (ibid.).

The government also issued a press release with supporting materials to help the public understand the consultation's objectives. The release included key quotes from the ministers of ISED and of Canadian Heritage, who emphasized the need to balance innovation with creator protection in the age of AI (ISED 2023b). It also summarized the consultation's link to ongoing legislative efforts, such as Bill C-27 and the proposed Artificial Intelligence and Data Act (ibid.). To further guide participants, the page listed related products — including the "Consultation on Copyright in the Age of Generative Artificial Intelligence" webpage and updated it with the "What We Heard Report" — and supplied associated links to previous initiatives such as the 2021 consultation on a modern copyright framework,

Canada's Digital Charter and the Voluntary Code of Conduct on Responsible Development and Management of Advanced Generative AI Systems (ibid.). Finally, the government included contact information for staff at ISED and the office of the minister of Canadian Heritage, ensuring that interested stakeholders could request clarification or submit additional input (ibid.).

The Competition Bureau Canada (2024a) released a discussion paper titled "Artificial intelligence and competition" in 2024, to help stakeholders prepare informed submissions. The paper emphasized the bureau's commitment to engaging Canadians on emerging digital economy issues and organized its inquiry around three central questions:

- how competition is developing in AI markets;
- how the bureau can protect and promote competition within them; and
- how it can prepare to address potential competitive harms arising from AI technologies (Competition Bureau Canada 2024b).

To guide responses, the document included eight targeted questions. The bureau explained how to submit feedback — either through an online form or by mail — and explained in its transparency policy that all submissions would be published online unless confidentiality was requested (ibid.). Supporting resources included related products such as the discussion paper itself and contact information for the bureau's Digital Enforcement and Intelligence Branch and media relations team, ensuring that stakeholders had both substantive context and practical guidance for engagement (Competition Bureau Canada 2024a).

However, each of the consultations required a significant understanding of competition and copyright policies, and Canadian citizens who lacked such knowledge may have been reluctant to participate. As with the three other country consultations that the authors studied, they found that most of the respondents did not answer all the questions.

Did Policy Makers Try to Ensure a Broad Cross-Section of People Knew About and Could Comment on the Proposed Policy?

Canadian policy makers relied on government websites to solicit and collect public feedback. The relevant agencies also turned to news releases (Competition Bureau Canada 2024a; ISED 2023b) and social media posts on Facebook (Competition Bureau Canada 2024c; ISED 2023c) and LinkedIn (ISED 2023d) to publicize the call for input. However, these efforts generated minimal engagement, with posts receiving little visible interaction (Competition Bureau Canada 2024c; ISED 2023c). OECD research shows that policy makers struggle to connect with, encourage and receive feedback from a diverse and representative sample of respondents on complex digital policy issues (OECD 2025b).

In the copyright consultation, officials released the call for comment on October 12, 2023, and accepted submissions until January 15, 2024 (ISED 2023b). The process combined an online questionnaire with a series of seven virtual, invitation-only round-table discussions intended to broaden participation across stakeholder groups and areas of expertise (ISED 2025b). According to government statements, round-table invitees represented a range of stakeholders, including participants from the cultural and technology industries, public interest groups, legal practitioners, scholars and Indigenous communities (ibid.). Officials conducted two of the seven sessions in French, while the others were held in English. The government encouraged participants to speak freely under conditions of non-attribution (ibid.). Despite these steps, officials acknowledged limited input from Indigenous participants (ibid.) and did not disclose detailed participant demographics, preventing the authors from assessing the inclusiveness of the process.

The Competition Bureau's consultation followed a similar structure, using an online feedback form and offering the option to submit comments by mail. The bureau opened the comment period from March 20 to July 7, 2024. The bureau received only 28 submissions, primarily from specialized stakeholders such as industry associations, technology firms and academics (Competition Bureau Canada 2025).

Taken in sum, the failure to broadly market these two calls led to a small number of respondents relative to Canada's population of 39 million.

How and When Did the Government Engage with Its Citizens?

Table 3 outlines the time frames for each consultation.

Did the Government Provide Evidence That It Used the Feedback It Received?

In Canada's copyright and AI consultations, the government released a "What We Heard Report" summarizing who participated, the key concerns raised, and areas of consensus and disagreement (ISED 2025b). The report highlighted, for example, the cultural industries' emphasis on consent and compensation for creative works used in AI, contrasting with technology industries' calls for clarification around text and data mining (ibid.). The report also described how the government would consider options for balancing copyright protection with innovation and noted proposed amendments to the Artificial Intelligence and Data Act that partially addressed stakeholder concerns (ibid.). However, the government did not explicitly indicate how the consultation directly influenced current or future policy decisions, leaving the actual impact of public feedback unclear.

Similarly, the Competition Bureau Canada (2025) released a "What We Heard Report" on its AI consultation. The government acknowledged receiving input on market evolution, firm competitiveness, partnerships and regulatory engagement (ibid.). The bureau stated that these insights would inform its approach to promoting competition (ibid.). Yet the consultation report provided no concrete examples of actions taken or planned in direct response to participants' feedback.

In summary, the authors found that while the Canadian government published what it heard from citizens, it failed to demonstrate how public feedback shaped policy decisions.

In both the copyright and competition consultations, the Canadian government took steps to inform and consult the public, but it did

Table 3: Overview of Public Consultation Timelines

Consultation	Date	Phase	Key Event/Action	Documents/Output
Consultation on copyright in the age of generative artificial intelligence	October 12, 2023	1	Call for comment was opened and consultation document was released on government website and social media.	Consultation documents were released, along with other background and supporting documents.
	Unknown	2	Seven virtual round-table discussions were held.	No further information about the round tables was published.
	January 15, 2024	3	Call for comment was closed.	—
	February 2, 2025	4	Response to the public was published.	"What We Heard Report" was released.
Public consultation on artificial intelligence and competition	March 20, 2024	1	Call for comment was opened and discussion document was released on government website and social media.	Consultation documents were released, along with other background and supporting documents.
	July 7, 2024	2	Call for comment was closed.	—
	January 27, 2025	3	Response to the public was published.	"What We Heard Report" was released.

Source: Table by Michael Moreno.

little to involve, collaborate with or empower stakeholders throughout the process (see Table 4).

Through online portals, news releases and targeted outreach, both consultations informed and consulted Canadians by soliciting comments from a range of stakeholders, including industry groups, creators, academics and members of the public. The government then acknowledged this input through "What We Heard" reports summarizing participation levels and key themes (Competition Bureau Canada 2025; ISED 2025b). However, neither consultation demonstrated genuine responsiveness. While both departments summarized what they heard, they did not explain how public input shaped policy outcomes or specific next steps. The process remained one-directional, with the government collecting feedback but not integrating it transparently into decision making. Nor did it empower participants to influence the direction or implementation of future AI or copyright policy.

→ developing mechanisms to ensure the public feels heard.[12]

Canada generally makes available relevant information on policies, programs, services and decisions in a complete, accurate and timely manner, while protecting privacy, security and confidentiality. However, because agencies typically do not provide a substantive response explaining how public comments were considered and whether they affected policy outcomes, citizens lack the information needed to judge or challenge those decisions. Moreover, while it may not be feasible or desirable for all Canadians to directly shape AI policy, current mechanisms offer limited opportunities for meaningful public input or influence (OECD 2023a, 50).

For example, as noted in the introduction, without significant advance notice and broad outreach, a 30-day sprint is unlikely to attract diverse participation. Moreover, the government did little to facilitate participation in its

Table 4: Applying the IAP2 Spectrum of Political Participation (Canada)

Consultation	Inform	Consult	Involve	Collaborate	Empower
Canada — Copyright	√	√			
Canada — Competition	√	√			

Source: Table by Michael Moreno.

Conclusions and Recommendations

The authors found that Canadian officials worked hard to be transparent and accountable to their citizens. However, like the other countries studied, Canada has yet to achieve meaningful participation, defined as the government effectively:

→ publicizing consultations to reach a broader, more representative audience;

→ ensuring that public participation is continuous and trustworthy rather than episodic; and

12 These criteria can be found in the Trust and Transparency Strategy:

- Transparency: The government makes available relevant information on policies, programs, services and decisions in a complete, accurate and timely manner — while protecting privacy, security and confidentiality — so the public can access, understand and monitor the activities and decisions of government. In short, the public has ready access to information they want and need.
- Accountability: The public can exercise its right to hold the government to account for its activities, performance and decisions through timely access to information. In other words, the public should be able to see and to question how their government is being managed.
- Participation: The public can influence the activities and decisions of the government through meaningful and targeted consultation and engagement. That is, the public should find it easy to be involved and participate in government decisions and initiatives. (See www.canada.ca/en/government/system/government-wide-reporting-spending-operations/trust-transparency/government-canada-trust-and-transparency-strategy.html)

decisions and initiatives. As the letter writers stated, the process looked pre-cooked.

Canadian officials solicit public comment but face challenges in ensuring input comes from a diverse range of stakeholders. Consultation processes are not always widely publicized, which can limit participation by the general public. As a result, while highly organized or motivated groups — such as industry stakeholders or content creators — are often heard, less organized or diffuse groups tend not to submit public comments. As a result, many Canadians who may be affected by AI are not involved in the development of AI policies.

The authors then attempted to compare what they learned about Canada with their other case studies published in earlier CIGI papers (see Table 5; Aaronson and Zable 2023; Aaronson 2025; Aaronson and Moreno 2025). Tables 6 and 7 provide further detail on each government's process and its limitations.

The process of seeking public comment on AI governance in Canada was similar to that of Australia, Colombia and the United States (Aaronson and Moreno 2025). None of these governments know yet how to encourage a broader cross-section of their people to participate in the consultative process. Table 7 illustrates key problems with that process.

Policy makers in Canada and other nations recognize that the traditional process of seeking feedback is not working well. Based on advice from the OECD and the Open Government Partnership, policy makers have experimented with new approaches to seeking public opinion. These new approaches, including citizen assemblies, alignment assemblies,[13] crowdsourcing, using AI to find consensus and utilizing influencers, have many positive features (OECD 2022), but they are often costly and difficult to scale up. The OECD (2025b, 30) now recommends that governments develop systems to gather insights about stakeholders' preferences and concerns, particularly by strengthening their ability to systematically collect, process and respond to large volumes of public input across consultations, digital platforms and administrative processes.

Moreover, these new approaches do not solve the three broad problems mentioned earlier. In this vein, the authors offer several suggestions to the Government of Canada (which has made meaningful participation a key goal) and other democracies. Policy makers should:

- **Work to build a base of common knowledge about AI.** Create or find readings that Canadians can review together in town halls, civic institutions, churches and so forth. Senior government officials and prominent Canadians could work together to encourage discussions based on well-researched books about AI issues, such as *The Alignment Problem: Machine Learning and Human Values* by Brian Christian; *Co-Intelligence: Living and Working with AI* by Ethan Mollick; or *The Worlds I See: Curiosity, Exploration, and Discovery at the Dawn of AI* by Fei-Fei Li (2023). In so doing, those who participate will be part of a new community and feel empowered. Such a process may also build trust in Canada's AI governance.

- **View public participation in AI governance not just as a policy problem but also as a marketing problem.** Find ways to market the call for participation on a wide range of platforms and within community organizations. Frame the call as asking for help to serve the Canadian (or other governmental) people. Create a culture of enthusiasm for public participation as well as institutions to support such participation among government agencies. For example, in 2019, France created the Centre of Citizen Participation under the Inter-Ministerial Directorate for Public Transformation. The centre does three things to encourage political participation in France: it acts as a centre of expertise, a physical space and a community of practice for all public servants. The centre provides public officials with knowledge resources, examples and templates to organize a participatory mechanism as well as ready-to-use digital tools. It also houses a portal for participatory opportunities at the national level. According to the OECD, the portal allows citizens to easily find opportunities and monitor the impact of their participation. It also allows public authorities to provide feedback and communicate about their participatory opportunities. As a physical space, public authorities can use it to organize

13 See www.cip.org/alignmentassemblies.

Table 5: Applying the IAP2 Spectrum of Political Participation (Canada and Other Case Study Countries)

Consultation	Inform	Consult	Involve	Collaborate	Empower
Canada — Copyright	√	√			
Canada — Competition	√	√			
United States	√	√			
Colombia	√	√			
Australia	√	√			

Source: Table by Michael Moreno.

Table 6: Did the Countries Achieve Meaningful Engagement?

Country	Did the Government Use Diverse Methods to Reach a Broad Citizenry (Not Just Stakeholders)?	Did the Government Provide Information in an Easy-to-Understand Format for Atypical Respondents?	Did the Government Establish Mechanisms to Demonstrate Responsiveness to Public Input?	Did the Government Achieve Meaningful Engagement?
Canada	Used speeches, government websites, surveys and limited dialogues; outreach reached organized stakeholders.	No; consultation materials were technical and assumed prior policy and AI knowledge.	Partially; government published "What We Heard" report summaries.	No.
Australia	Relied primarily on government websites, formal submissions, expert round tables and advisory bodies.	No; consultation materials were technical and assumed prior policy and AI knowledge.	Partially; government published "What We Heard" report summaries and cited specific feedback that informed decisions, including the creation and role of an AI advisory board.	No.
Colombia	Relied primarily on government websites, social media and public workshops.	No; consultation materials were technical and assumed prior policy and AI knowledge.	No evidence that public input influenced final policy outcomes.	No.
United States	Relied on speeches, government websites, Federal Register notices, and dialogues with affected and expert stakeholders.	No; consultation materials were technical and assumed prior policy and AI knowledge.	No evidence that public input influenced final policy outcomes.	No.

Source: Table by Michael Moreno.

Table 7: What Is Wrong with the Consultative Process in Democracies?

Problem with the Process	Why It Matters	Proposed Alternative	Pros of Alternative	Cons of Alternative
Objective of call is unclear — do policy makers want lots of comments, or do they want lots of people with expertise to comment?	Objective will shape approach to seeking comments.	Policy makers should make clear what outcomes they want from the consultative process.	—	—
No shared common knowledge and experience to foster collaboration. Governments must write documents that explain the issue and enable citizens to comment effectively.	Policy makers must know how to write primer-level documents or broadly marketed private publications. Citizens must have the will to read such documents and review them critically.	Democratize access to information by creating tiered materials with short summaries, infographics, videos and detailed documents. Provide materials in multiple languages, primers (in writing and short videos), and AI literacy programs on TikTok for all ages.	Enhance understanding at all levels.	Expensive and time-consuming.
Officials rely on platforms not widely known or accessed by non-policy sophisticated audiences; cannot get a representative sample.	Without such a broad sample, process is failing democracy. Special interests have too much influence, while marginalized voices are excluded.	Bring the government (consultation) to the people by going beyond marketing in traditional platforms to multiple platforms. Move away from 30-day "sprints" to constant, ongoing consultations. Targeted outreach through community groups, ethnic newspapers and partnering with non-profits and influencers.	More people will hear about the call for comments and can respond.	Expensive.
Governments inform and consult but do not collaborate with their citizens on finding mitigating strategies to address public concerns.	Some who collaborate do not feel heard.	Always-on strategy by establishing a dedicated portal or stakeholder council for ongoing dialogue (not just one-off notices). Mandate responsiveness and transparency.	—	Expensive and time-consuming
Need a mechanism to ensure people are heard.	If people do not feel heard, this can yield distrust.	Ombudsperson's office on AI to ensure public concerns are heard and policy makers follow up.	Public can challenge government decisions through always-on representative and process.	Expensive.

Source: Table by Susan Ariel Aaronson.

meetings or any other activities with citizens and stakeholders. Finally, the centre has ongoing communities of practice on a wide range of topics such as collective intelligence and public participation (OECD 2023a, 42). Since it began, the centre has innovated with mobile debates (in markets, on trains); debate caravans; kits for local initiative meetings; and in the use of virtual reality tools (Casillo 2023).

→ **Establish a portal at ISED where citizens can ask questions and provide feedback about AI policies and designate staff to serve as citizen guides and advocates, who could respond to concerns submitted in the portal.** Canada has a model for this: from April 27 to June 27, 2022, the Government of Canada invited stakeholders to share their views on existing regulatory barriers impeding trade domestically and internationally through the "Let's Talk Federal Regulations" consultation platform. Regulatory stakeholders were invited to identify opportunities to align and cooperate on regulations with other governments.[14] Writing for the Canadian Centre for Policy Alternatives, Joseph Gubbles and Stuart Trew (2023) reported that the "Let's Talk Federal Regulations is not widely advertised beyond posts to the Canada Gazette and government social media accounts, and through emails to people on existing regulatory policy stakeholder lists. However, anyone who finds their way to the platform can register to participate (with the option to register anonymously), and anyone can read the ongoing discussions without registering." The Treasury Board stated that "once a project is closed, the results of the discussions are analyzed and used to draft a 'roadmap' for implementing the regulatory reform. Some projects commit to posting a summary of the feedback and discussions, which nonetheless remain publicly visible after the project has closed" (ibid.). The Canadian government has published some of these summaries, although one cannot get a sense of how interactive these discussions were (Treasury Board of Canada Secretariat 2024). The government could continue such experiments.

→ **At every relevant government agency or department, designate an ombudsperson to respond to public concerns over the agency's policies and practices related to AI.** The ombudsperson should investigate citizen complaints and resolve them and identify and report on broader, recurring problems within the agency to recommend policy and procedural changes.

In sum, over the past three years, the authors have examined several democracies and found that although policy makers go through the motions of consultation, they are not achieving meaningful engagement. While individuals do participate in these processes, consultation designs tend to favour organized stakeholders, such as industry groups, academics and rights holders, whose technical expertise and institutional resources position them to engage more effectively than the average citizen. Canada's acknowledgment of this gap, reflected in initiatives such as the Maturity Model for Public Participation, is a promising step, but recognition alone is insufficient without concrete implementation and accountability.

As AI systems become more deeply embedded in economic life, public services and social interactions, policy makers will struggle to sustain legitimacy if they do not ask for, enable, listen, value and respond to the concerns of their citizens.

14 See https://open.canada.ca/data/dataset/ac8fcb8a-472c-43a9-bde6-0cdb07c6b721.

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67 Erb Street West
Waterloo, ON, Canada N2L 6C2
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