



Treasury Board of Canada
Secretariat

Secrétariat du Conseil du Trésor
du Canada

Secretary of the Treasury Board

Secrétaire du Conseil du Trésor

Ottawa, Canada
K1A 0R5

April 26, 2022

Mr. John Williamson
Chair
Standing Committee on Public Accounts
House of Commons
Ottawa, Ontario
K1A 0A6

Dear Mr. Williamson:

Thank you for your letter, dated April 4, 2022, regarding the Oversight of Government Advertising. I appreciate having the opportunity to clarify the basis on which government advertising campaigns are subject to mandatory external reviews.

While the external non-partisan review process is a valuable tool, it is important to reiterate that all Government of Canada advertising is subject to numerous internal checks and balances throughout the planning and approval stages. Public servants in departments, along with those at the Treasury Board of Canada Secretariat (TBS), Public Services and Procurement Canada (PSPC) and the Privy Council Office (PCO) work together to ensure that advertising aligns with government priorities, legislation and policies. Furthermore, all public servants are expected to conduct themselves in accordance with the *Values and Ethics Code for the Public Sector*, including carrying out their duties in accordance with legislation, policies and directives in a non-partisan and impartial manner.

One of the recommendations outlined in the 2019 Spring Report of the Auditor General of Canada entitled *Oversight of Government of Canada Advertising* was that TBS consider a risk-based approach to identify which advertising campaigns should undergo a mandatory external review. As noted in the July 2021 response to the Standing Committee on Public Accounts, TBS considered various factors in determining the extent to which a dollar-based threshold is a reliable indicator of risk. This included different threshold levels, campaigns linked to government priorities as well as audience reach and subject matter. When it comes to audience reach and subject matter, campaigns with larger budgets are typically linked to government priorities and have the broadest reach, and therefore, would have to go through the external review process reducing the risk of partisanship in advertising.

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When the threshold was reduced to \$250,000 in 2020-21, it was intended to capture, at a minimum, 80% of all advertising expenditures. TBS has committed to reviewing the dollar-based threshold annually to ensure this percentage is maintained. A recent analysis of the 2020-21 data indicated that, in fact, the new threshold has brought 96% of expenditures through the external review process. Furthermore, departments can, and do, submit campaigns under the mandatory threshold for a voluntary review. Since the oversight mechanism was established in 2016, a total of 31 campaigns have been voluntarily submitted.

Finally, while there are several internal and external checks and balances in place for advertising, members of the public can submit a complaint online anonymously should they feel that a government ad is partisan. If a complaint is received, it is reviewed, and the findings are posted on Canada.ca. Since our update to PACP in 2021, four complaints have been received. These complaints were reviewed by TBS and PSPC, and none have been upheld.

In closing, TBS remains committed to ensuring there is a robust independent oversight of Government of Canada advertising and to monitoring the effectiveness of the process and adjusting as required. Our view continues to be that a dollar-based threshold for mandatory reviews remains the best way to provide assurance that public funds are not being used for partisan purposes.

I trust this addresses any remaining questions regarding the efficacy of the government's approach to non-partisan advertising.

Yours sincerely,

**Flack,
Graham**

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Graham Flack