1. Modern Emergency Management

Is the current scope of the *Emergency Preparedness Act* broad enough to adapt to a continuously evolving threat and risk environment, and adequately balanced to promote the full spectrum of emergency management activities?

ITAC agrees that critical infrastructure protection and cyber security need to be understood as closely related elements of modern emergency management. For that reason we are very disappointed that the recently named Advisory Council on National Security does not appear to include any clear cyber-security experts. We are also disappointed that the Cyber Security Task Force called for in the *National Security Policy* document has not yet been named.

2. Ensuring Government of Canada Readiness

How should the Minister of Public Safety and Emergency Preparedness report on the Government of Canada's state of preparedness for dealing with emergencies?

ITAC agrees that the Act should be revised to "establish a mechanism to monitor, coordinate, assess and make recommendations about the Government of Canada's state of emergency preparedness". We will be pleased to work with government to make this happen, and would note that we have received tremendous cooperation from PSEPC officials whenever we have invited them to update the ITAC Cyber Security Forum on the department's work in this and other areas.

3. Seamless Emergency Management

How should the Government of Canada address the fact that the Canadian emergency management communities have recognized the need to harmonize with federal emergency response activities?

ITAC agrees that "Emergency services … must be able to work together (and often with international partners) to deal with natural disasters, critical infrastructure disruptions, cyber incidents and terrorist attacks." Companies in our industry, notably the telecom carriers, have a long history of working with first responders in a broad range of emergency situations – both when it is the telecom infrastructure that has been compromised and in other situations when high-quality communication must be protected and facilitated.

4. Effective Partnerships

What kinds of arrangements should be considered to support effective partnerships in the areas of emergency management and critical infrastructure protection? What kind of arrangements should be considered to ensure that stakeholders' systems and approaches are complimentary and compatible?

ITAC agrees that "Critical infrastructure protection must be examined not just in terms of security, but also in terms of its impact on commerce and trade." We also agree that partnerships should be looked to as providing an effective means of involving governments and the private sector as partners on a voluntary basis. A telecom CERT is one initiative that might be considered.

5. Information Sharing

Is there a need for a new authority to protect specific sensitive information related to emergency management/critical infrastructure?

The consultation paper notes, "The Canadian private sector has expressed strong support for the exchange of sensitive critical infrastructure information with the Government of Canada. However, concern has also been voiced about the confidentiality of commercial or proprietary information and its protection from inappropriate release. Such release could harm the competitive position and business reputation of service providers or expose them to liability by inferring negligence or fault."

ITAC agrees that "information on threats, vulnerabilities and critical systems provided by the private sector to the Government of Canada requires protection from unauthorized use". We would point out that there may be additional concerns when information is liable to be shared with entities outside Canada; in some cases, foreign governments have very close links with our members' business competitors, especially national telecom carriers.

As is noted in the consultation paper, public-private collaboration requires trust and openness; all parties must trust that all other parties are fully aware of the rules that have been established – and will follow them scrupulously. While we are not convinced of the need for a new authority, there must certainly be a capable body that is fully aware and respectful of its obligations to protect information.

6. Reliable and Resilient Critical Infrastructure

Can Canada attain an acceptable level of critical infrastructure reliability through a voluntary standards approach?

ITAC agrees that the Act "should be revised to recognize the need for collaboration on standards and best practices in emergency management and critical infrastructure reliability". In fact we are very encouraged by PSEPC's apparent willingness to go the standards route, especially given the department's refusal to incorporate standards in its approach to lawful access to electronic communications. In ITAC's view, approaches based on international standards should be seen as integral elements of Canada's response in both areas.