

# **EYES ON EVIDENCE II**

**AN ASSESSMENT  
OF THE TRANSPARENCY  
OF EVIDENCE USAGE IN THE  
GOVERNMENT OF CANADA**

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## An assessment of the transparency of evidence usage in the Government of Canada

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**Evidence for Democracy** is the leading fact-driven, non-partisan, not-for-profit organization promoting the transparent use of evidence in government decision-making in Canada. Through research, education and issue campaigns, Evidence for Democracy engages and empowers the science community while cultivating public and political demand for evidence-based decision-making.



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# Executive Summary

Policy-making is a complex and nuanced process, where policy actors must make sense of constantly evolving information in order to deliver policies that best serve the needs of the people. Putting evidence at the heart of policy-making is critical to not only illustrate the realities of a particular issue, but also to challenge what we might think is common sense when it comes to making decisions.

In recent years, the Government of Canada has repeatedly committed to using the best available science and evidence in its decision-making. And yet, transparency is the persistently missing link, making it difficult to assess what progress has been made in this endeavour, and whether the public can in fact assess the relationship between evidence and policy decisions. Since government policy is in essence a public good, transparency helps ensure the public can understand what considerations lead to a decision, and why.

In *Eyes On Evidence: A framework for evaluating evidence use in Canada* (2021), we adapted a framework from the United Kingdom to evaluate the transparency of evidence underlying policy decisions, and tested the framework on seven federal policies. Now, in this study, we applied the same transparency framework to assess the transparency of evidence use in a total of 100 policies from 10 departments and agencies in the Government of Canada.

## KEY FINDINGS

- » **We applied a transparency framework to assess the transparency of evidence usage in 100 randomly selected policies across ten federal departments and agencies.** Simply put: can the evidence behind policy decisions be found by the lay public? The framework consists of four categories:
  - **Diagnosis:** What do policy-makers know about the issue?
  - **Proposal:** What is the government's chosen intervention, and why was it chosen?
  - **Implementation:** How will the chosen intervention be rolled out, and why was this method chosen?
  - **Testing and evaluation:** How and when will we know if the policy has worked?
- » **Overall, our assessment found that policies scored low on the transparency of evidence usage, meaning that it's very difficult for members of the public to find the evidence behind government policy.** Too often, policies failed to provide a reference or citation for any evidence mentioned, and rarely acknowledged alternative policy options, or any absent, weak or contradictory evidence.
- » **Transparency scores varied across different departments.** The department that received the highest scores was Environment and Climate Change Canada, in part due to detailed regulatory impact statements. The departments which received the lowest scores were Canadian Heritage, and Health Canada. But higher assessment scores do not necessarily require documents to be longer — policies can achieve high transparency scores without being lengthy.

- » **There were some shared shortcomings across departments.** Too often, policies failed to provide a reference or citation for any evidence mentioned. Across all departments, almost all policies scored poorly (i.e., received a 0) in the testing and evaluation section (i.e., to know how and when a policy has worked), and rarely explored the merits of alternative policy options, or acknowledged any absent, weak or contradictory evidence.
- » **The transparency framework is not a perfect measure.** Our framework does not assess the quality of evidence. Additionally, if the evidence behind a policy decision cannot be found, it doesn't mean that the evidence doesn't exist, or that it wasn't considered in the policy-making process.
- » **The commitment to evidence-informed decision-making is inherently political.** In applying the transparency framework, a bigger question emerges: what does it really mean to translate the political commitment to the principles of best available science and evidence in policy-making to the systems, structures and resources of the public service?
- » **Transparency is not the end goal, but instead, is the first step on a path to fostering public trust and realizing the political commitment to evidence-informed decision-making.** The next stage of this project will extend this transparency assessment to the provincial level, as policy-making is distributed across several levels of government jurisdiction. We will also continue discussions with governments across the Canadian federation to better understand what challenges may impact the transparency of evidence usage in policy-making processes.

# Introduction

## 1.1 Background

Policy-making is a complex and nuanced process. In governments across the Canadian federation, policy actors must gather, synthesize and make sense of constantly evolving information from many sources. This often involves measuring risk, gauging impact, and weighing conflicting demands from many stakeholders. This is no easy feat.

Previously, Members of Parliament have described many challenges relating to the use of science and evidence in their work, including having to navigate conflicting findings and managing information overload, all amid time restrictions and limited resources.<sup>1</sup> Similarly, senior public servants have expressed a desire for academics to be more involved in policy processes, and that institutional changes (such as public participation) could help to better integrate science into decision-making.<sup>2</sup>

While several challenges exist, evidence-informed decision-making remains a worthwhile endeavour. We all benefit when governments make policy decisions informed by the best available evidence. Scientific evidence helps illustrate the realities of a particular dilemma, both in present and past states, which can help predict future states and impacts as well. Evidence also challenges what we might think is common sense, and can help policy-makers understand what works, where, why, and for whom.<sup>3</sup>

At the same time, we recognize the limitation of scientific evidence – it is but one way of illuminating the dimensions of an issue. There is, undoubtedly, an appropriate balance

to be struck in accommodating evidence and the range of critical inputs and perspectives needed for robust decision-making.

In recent years, the Government of Canada has emphasized the importance of using scientific evidence in decision-making.<sup>1</sup> For example, under Prime Minister Justin Trudeau's tenure, mandate letters issued to Cabinet ministers in 2015, 2019 and 2021 have all stated a commitment to the "use of science and evidence-based decision-making."<sup>4</sup> Important steps have been taken to mobilize this commitment within the public service, such as the appointment of a Chief Science Advisor (2017) and eight departmental science advisors across the federal government.<sup>5,6</sup> Recently, the 2021 federal budget outlined investments in data capacity to help ensure governments and the public can find and use evidence.<sup>7</sup>

Most notably, the COVID-19 pandemic has spurred encouraging examples of evidence-informed decisions shaping global responses.<sup>8,9</sup> Governments have relied heavily on the best available, and often incomplete, evidence base to make extraordinary decisions with far-reaching consequences. But the pandemic has also illustrated that the public often struggles to understand why certain policy decisions are made, and even more so to decipher the chain of reasoning behind how evidence is used (or not used) along the way. At times, this has led to confusion, mis/disinformation, and in some cases, widespread public disapproval or anger.

Above all, transparency is the persistently missing link. Since government policy is in essence a public good, it is important for policy-making to be as transparent as possible so that

the public can understand what considerations lead to a decision, and why.

Yet, conversations on evidence-informed decision-making tend to devote little focus to the public's ability to understand the relationship between evidence and policy decisions. The complexity of the policy-making process is significant, but does not obscure the need for transparency. If members of the public are to understand the motivations around a policy decision, they must be given the opportunity to understand how decisions are arrived at and how evidence is being used to formulate these decisions. This is especially important in times of increased uncertainty when trust in government decisions is critical.

Without transparency, commitments to evidence-informed decision-making, driven in large measure by the political class, will remain difficult to assess. Here, some of the core questions to consider are: how is scientific evidence used in the policy-making process? How does evidence move through the structures of government, and who is responsible for stewarding it through?

## 1.2 A framework for evaluating evidence use in policy

To address a similar gap in transparency regarding evidence use in policy in the United Kingdom (UK), a transparency framework was developed by the Institute of Government, Sense About Science and the Alliance for Useful

Evidence to evaluate if the evidence contributing to policy decisions could be found by the public.<sup>10</sup> This framework provides a method to test for the transparency of evidence in policy. It can be applied rapidly, does not require subject matter expertise, and allows for comparison between different policy areas.

In a follow-up report, titled *Show Your Workings*, Sense About Science further refined this framework, assessed a set of government policies and provided advice on improving transparency in departments.<sup>11</sup> Next, in 2018, Sense About Science used the framework to complete a spot-check – that is, an assessment of the transparency of evidence behind 94 government policies produced by 12 departments.<sup>12</sup> The 2018 report listed transparency scores publicly, and noted that while there had been some improvement in the transparency of evidence in policy, there was still room for improvement in the availability of testing and evaluation of policy decisions.

In 2021, Evidence for Democracy adapted this framework to evaluate the transparency of evidence underlying policy decisions in the Canadian context (**Figure 1**), and tested the framework on seven specific policies.<sup>13</sup> As in the UK, our adapted framework consists of four categories: diagnosis (what do policy makers know about the issue?), proposal (what is the government's chosen intervention, and why was it chosen?), implementation (how will the chosen intervention be rolled out, and why was this method chosen?) and testing and evaluation (how and when will we know if the policy has worked?). Simply put: can the evidence behind policies be found by the lay public?

## 1.3 Evaluating the transparency of evidence poses bigger questions

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Our transparency framework is not without its limitations. For example, the framework only assesses whether the underlying evidence behind a policy decision can be found. It does not assess the quality of the evidence, if found. In addition, being unable to find the underlying evidence doesn't mean that the evidence doesn't exist, or that it wasn't considered in the policy-making process.

Amid these nuances, one thing is clear: the repeated references to “use the best available science and evidence” in recent mandate letters are in fact political statements. In applying our transparency framework, we are also assessing the alignment between stated political commitments and public service capacity. In other words, we are asking: are government systems, structures and resources equipped to translate the political commitment to “evidence-based decision-making”, and in a format that is accessible to the general public?

## 1.4 Current study

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In this study, we are applying our adapted transparency framework to assess the transparency of evidence usage in policies across the Government of Canada (i.e., from federal departments and agencies), and to highlight best practices in transparency.



		0	1	2	3
<b>Diagnosis:</b> What do policymakers know about the issue (e.g. causes, effects and scale)?	<i>Can you see what evidence has been used and the role it has played?</i>	Not enough for level 1.	Evidence is mentioned, with explanation of how it has been used	As in level 1, but the supporting evidence is linked to the relevant parts of the policy, properly cited, and able to be found.	As in level 2, but the evidence base is also assessed, with consideration of uncertainties and contradictory information.
<b>Proposal:</b> What is the government's chosen intervention and why was it chosen?	<i>Can you see what evidence has been used and the role it has played?</i>	Not enough for level 1	Evidence is mentioned, with explanation of how it has been used	As in level 1 but the supporting evidence is linked to the relevant parts of the policy, properly cited, and able to be found.	As in level 2, but the evidence base is also assessed, with consideration of alternate options, uncertainties, and contradictions
<b>Implementation:</b> How will the chosen intervention be rolled out and why was this method chosen?	<i>Can you see what evidence has been used and the role it has played?</i>	Not enough for level 1	Evidence is mentioned, with explanation of how it has been used	As in level 1 but the supporting evidence is linked to the relevant parts of the policy, properly cited, and able to be found.	As in level 2, but the evidence base is also assessed, with consideration of alternate options, uncertainties, and contradictions
<b>Testing and evaluation:</b> "How and when will we know if the policy has worked?"	<i>Can you see what evidence will be provided and when it will be provided?</i>	Not enough for level 1	Success measures (or process for developing them outlined), with no plans for testing/evaluation (or explanation for why inappropriate)	As in level 1, but with plans for testing/evaluation, including timetable (or explanation for why inappropriate)	As in level 2, with explanation of why these testing/evaluation methods are chosen, with linked evidence properly cited and able to be found.

**Figure 1:** The transparency framework consists of four categories (diagnosis, proposal, implementation, testing and evaluation), and assesses whether the evidence used to inform a policy is clear, as well as how it was used, on a scale from 0-3 based on criteria.

# Methods

## 2.1 Definition of policy

Similar to Sense About Science, we defined a *policy* as a “specific intervention to change the status quo at a level that is intuitively characterised as ‘a policy’ by the public, politicians and the media.”<sup>11,13</sup> This includes both primary and secondary legislation, including bills, regulations, funding announcements, and more.

For the purposes of this research, evidence was defined as any type of data or analysis, including both qualitative and quantitative data.<sup>13</sup> Government documents focus on a variety of sources of evidence, including, but not limited to: academic literature (e.g. peer-reviewed publications), government reports, data collected and analyzed both in and outside the government, and results of consultations (including submissions from stakeholders and results of engagement with Indigenous groups).<sup>13</sup>

## 2.2 Policy collation

Using the Canada Gazette and the news section of each federal department and agency, all eligible policies announced between January 1<sup>st</sup> to June 30<sup>th</sup> 2021 were assembled. In each case, the policy was the point of first announcement. Similar to the UK framework, the transparency framework was developed to evaluate policies upon first announcement. While we are aware that policies are subject to refinement after an initial announcement, the first release of a policy is when the public, as well as the media, stakeholders, and other elected officials, have their first opportunity to examine the policy.<sup>13</sup>

The eligibility of each policy was verified using two independent researchers. Examples of policies that were excluded included calls for proposals (funded proposals, rather than a call for applications for funding, represent a change from the status quo), job appointments (unless for example, a position was created) and report releases (unless accompanied by a change in policy).

The following ten departments and agencies were included in this study: Agriculture and Agri-Food Canada, Canadian Heritage, Environment and Climate Change Canada, Fisheries and Oceans Canada, Global Affairs Canada, Health Canada, Innovation, Science and Economic Development Canada, Natural Resources Canada, Public Health Agency of Canada, and Transport Canada.

## 2.3 Policy assessment

A total of ten policies were randomly selected for each department, resulting in a total sample set of 100 policies (**Appendix**). All policies, and any supporting documents that were released and linked within (such as backgrounders or annexes) were examined and assessed using the criteria from the transparency framework (**Figure 1**). Each policy was assessed by two independent researchers. In the event that a policy assessment received two conflicting scores, a third researcher weighed in to make a final decision.

# Findings

## 3.1 Transparency scores

In this study, we assessed the transparency of evidence usage in a total of 100 federal policies. In the following transparency score tables, the scores for policy assessments for each federal department and agency can be found, as well as the list of the policies assessed (Pages 13-17, Appendix).

**Overall, our assessment found that policies scored low on the transparency of evidence usage, meaning that it's very difficult for members of the public to find the evidence behind government policy.** Too often, policies failed to provide a reference or citation for any evidence mentioned, and rarely acknowledged alternative policy options, or any absent, weak or contradictory evidence.

Our findings also indicate:

- » **Transparency scores varied across different departments.** The department that received the highest scores was Environment and Climate Change Canada, in part due to the detailed regulatory impact statements that accompanied a majority of policy announcements. The departments which received the lowest scores were Canadian Heritage, and Health Canada.
- » **When we searched for the underlying evidence used to understand a policy issue, the results split fairly evenly.** The diagnosis section asks: what do policymakers know about the issue? When we assessed what evidence had been used and the role it had played in this section, 45% of policies received a 0, while 48% of policies received
- a 1. In other words, policies either failed to mention any underlying evidence (a 0), or mentioned evidence but with no citation to track down the source (a 1). Only seven policies received a 2 in this section (i.e., the supporting evidence was linked, properly cited and able to be found).
- » **When we searched for evidence about why an intervention was selected, a majority of policies tended to mention the underlying evidence, but with no supporting source.** The proposal section asks: what is the government's chosen intervention and why was it chosen? Upon assessing the transparency of evidence usage here, 67% of policies received a 1 (i.e., evidence was mentioned, with an explanation of how it has been used). 29% of policies received a 0 in this section, and only four policies received a score of 2.
- » **When we searched for evidence about how (and why) the chosen intervention would be rolled out, a majority of policies scored poorly.** The implementation section asks: how will the chosen intervention be rolled out, and why was this method chosen? Here, 63% of policies received a 0. A third of policies (35%) received a score of 1. Only two policies received a score of 2 (i.e., supporting evidence was able to be found).
- » **Across all departments, policies scored poorly in the testing and evaluation section.** The testing and evaluation sections asks: how and when will we know if the policy has worked? 94% of policies received a 0 in this section. Among the six remaining policies, five policies received a 1, and a single policy received a score of 2.

- » **There were only three policies, across two departments, which scored at least a 1 at minimum in each section.** These policies were:
  - Environment and Climate Change  
Canada's *Canada Gazette, Part I, Volume 155, Number 8: Order Amending Schedule 1 to the Species at Risk Act*
  - Environment and Climate Change Canada's *Recovery Strategy (Amended) and Action Plan for the Piping Plover *melodus* subspecies (*Charadrius melodus melodus*) in Canada [Proposed]*
  - Transport Canada's *Canada Gazette, Part I, Volume 155, Number 25: Regulations Amending the Canadian Aviation Security Regulations, 2012 (Various Amendments)*.
- » **A total of 19 policies, across eight departments, scored poorly (i.e., received a 0 for every section of the transparency framework).** This included policies from Agriculture and Agri-Food Canada (n=3), Canadian Heritage (n=3), Environment and Climate Change Canada (n=2), Health Canada (n=3), Innovation, Science and Economic Development Canada (n=1), Natural Resources Canada (n=2), Public Health Agency Of Canada (n=2), and Transport Canada (n=3).
- » **Policies rarely assessed their evidence base critically.** Across all assessments, there was no policy which received a score of 3 in any of the four sections (i.e., diagnosis, proposal, implementation or testing and evaluation). A 3 indicates that the criteria for a 1 and 2 were met (i.e., evidence is mentioned and properly cited, with an explanation of how it was used), and that there was also consideration of alternate options, uncertainties, and contradictions within the policy.

## Agriculture and Agri-Food Canada

	Diagnosis	Proposal	Implementation	Testing & Evaluation
Program to Develop Leadership Skills and Inspire Careers in Agriculture	0	1	1	0
Minister Bibeau announces support to help spur innovation for Quebec pork producers	0	1	1	0
Food Centre Expansion Will Support Saskatchewan's Value-Added Agriculture Sector	0	0	0	0
Governments Investing in Meat Processors Capacity in Ontario	0	1	1	0
Minister Bibeau announces new programs that deliver full and fair compensation for chicken, turkey and egg farmers	0	1	1	0
Government of Canada invests \$2.6 million to help improve safety of agri-food workers in Nova Scotia	0	0	0	0
Government of Canada highlights Canadian Agriculture Safety Week with up to \$1.4 million investment to boost farm safety	0	1	1	0
Expanding Ontario's Meat Processing Sector	1	1	0	0
Governments of Canada and Saskatchewan make \$9.8 million investment into crop research	0	0	0	0
Regulations Amending the Health of Animals Regulations (Emergency Transit): SOR/2021-114	1	1	1	0

## Canadian Heritage

Introduction of Bill C-32, an Act for the Substantive Equality of French and English and the Strengthening of the Official Languages Act	1	1	1	0
The Government of Canada Announces Funding for the Canadian Sport Centre Atlantic	0	1	0	0
Investing in Arts and Culture in Sherbrooke	0	0	0	0
Government of Canada Highlights More Than \$3.6 Million in Support for Official Languages in British Columbia	1	1	0	0
The Government of Canada Increases Support for the Audiovisual Sector for Production Stoppages Caused by COVID-19	0	0	0	0
The Government of Canada Announces \$3.4 Million in Funding for Official Languages in Alberta	1	1	0	0
The Government of Canada Confirms Almost \$3 Million in Official Languages Funding in Saskatchewan	1	1	0	0
Investment in the Glenaladale Estate in Prince Edward Island	1	1	0	0
Investing in Cultural Infrastructure in Milton	0	0	0	0
Investing in Heritage Spaces in Sudbury	0	0	1	0

## Environment and Climate Change Canada

	Diagnosis	Proposal	Implementation	Testing & Evaluation
Government of Canada releases Policy Statement on future thermal coal mining projects and project expansions	1	1	0	0
Government of Canada announces next step in creation of domestic carbon offset to further support clean growth	0	1	1	0
Government of Canada supports community in conserving habitat of species at risk in southern Quebec	1	1	1	0
Order 2021-87-01-02 Amending the Non-domestic Substances List	0	0	0	0
Canada Gazette, Part I, Volume 155, Number 8: Order Amending Schedule 1 to the Species at Risk Act	2	2	2	1
Publication after screening assessment of the two substances in the Thiophosphate Alkyl Esters Group”	1	1	0	0
Description of critical habitat for the Sable Island Sweat Bee in the Sable Island Bird Sanctuary	2	2	1	0
Ministerial Condition No. 20656	0	0	0	0
Order 2021-112-03-01 Amending the Domestic Substances List: SOR/2021-16	1	1	1	0
Recovery Strategy (Amended) and Action Plan for the Piping Plover melodus subspecies (Charadrius melodus melodus) in Canada [Proposed]	1	1	2	1

## Fisheries and Oceans Canada

Government of Canada invests in partnerships to support freshwater habitat research	1	0	0	0
Canada launches transformative effort to save Pacific salmon	2	1	0	1
2021 Newfoundland and Labrador fisheries decisions	1	0	0	0
Agreement-in-Principle reached between Canada and France for 3Ps cod fishery	0	0	1	0
Government of Canada takes important steps to protect critical habitat of trout in Alberta	2	1	0	0
Quebec Fisheries Fund grants more than \$1 million for 13 projects across the province	0	1	0	0
Extension of Saguenay Fjord Winter Recreational Groundfish Fishery	1	0	0	0
Government of Canada and Province of Nova Scotia invest more than \$44 million in the fish and seafood sector	1	1	1	0
Government of Canada and Province of Prince Edward Island invest more than \$3M in the fish and seafood sector	1	1	1	0
Share and view ideas: Draft Policy on Fisheries Act Permits for Shark Fin Import and Export for Scientific Research	0	1	0	0

## Global Affairs Canada

	Diagnosis	Proposal	Implementation	Testing & Evaluation
Canada announces new assistance for those affected by conflict in Ethiopia's Tigray region	1	1	1	0
Canada sending medical supplies to support COVID-19 response in India	0	1	0	0
Canada renews partnership with Grand Challenges Canada to spur innovations for global health	1	1	1	0
Canada begins public consultations on joining the Digital Economy Partnership Agreement	0	1	0	0
Minister Ng launches public consultations on trade negotiations with United Kingdom	1	1	0	0
Canada announces new funding in continued response to humanitarian crisis in Yemen	0	1	1	0
Minister of Foreign Affairs announces Canada's contribution to the United Nations Peacebuilding Fund	0	1	0	0
Canada announces support to combat land degradation and desertification in developing countries	1	1	0	0
Certain Fees in Respect of the Issuance of Passports (2017 British Columbia Forest Fires) Remission Order: SI/2021-20	1	1	1	0
Order Repealing the United States Surtax Order (Aluminum 2020): SOR/2021-112	1	1	0	0

## Health Canada

Health Canada announces funding for a tobacco cessation project to mark World No Tobacco Day 2021	1	1	0	0
Health Canada announces new measures for use of neonicotinoid pesticide imidacloprid	1	1	0	0
Government of Canada announces \$20 million to help communities respond to increasing opioid-related overdoses	2	1	1	0
Health Canada issues label change authorization for Pfizer-BioNTech COVID-19 vaccine	0	1	0	0
Government of Canada Invests More Than \$3 Million to Virtual Health Care Services in Yukon	0	0	0	1
Proposed Guidelines for Canadian Drinking Water Quality for 4-Chloro-2- methylphenoxyacetic Acid (MCPA)	1	1	0	0
Canada Gazette, Part I, Volume 155, Number 26: Regulations Amending the Food and Drug Regulations (Supplemented Foods)	1	1	0	0
Public consultation on the Canadian Biosafety Standard (CBS), third edition	0	0	0	0
Consultation: Proposed Amendments to the Carriages and Strollers Regulations	0	0	0	0
Consultation on Difenconazole, Proposed Maximum Residue Limit PMRL2021-01	0	0	0	0



## Innovation, Science and Economic Development Canada

	Diagnosis	Proposal	Implementation	Testing & Evaluation
Government of Canada announces new independent regulator for patent and trademark agents	1	1	1	0
Minister Carr and PS Duguid announce Shop Local investment benefiting small businesses across the Prairies	1	1	1	0
Universal Broadband Fund–supported project will bring high-speed Internet to the Wahnapiatae First Nation in Greater Sudbury	2	1	0	1
Government of Canada provides more support to CAN Health Network	0	1	0	0
Government of Canada investing to position Canada as a global leader in cyber security	1	1	1	0
\$19.8 million to provide high-speed Internet access to over 1600 households in Mauricie by September 2022	1	0	0	0
Universal Broadband Fund–supported projects will bring high-speed Internet to Alberta communities	1	1	0	0
Minister Ng announces launch of Highly Affected Sectors Credit Availability Program	0	1	1	0
Notice No. SMSE-005-21 – Release of RSS-182, Issue 6, Amendment of RSS-117, Issue 3, and Amendment of RSS-287, Issue 2	1	1	1	0
Share your views on the proposed change to the refusal and review process for industrial design decisions	0	0	0	0

## Natural Resources Canada

Canada and FCM Invest in Energy Efficiency in Prince Edward Island and Nova Scotia	0	0	1	0
Canada Invests in a Greener Ottawa	0	0	0	0
Canada Invests in Mining Literacy for Young Canadians	1	1	1	0
Canada Invests in Next-Generation EV Charging Networks in B.C.	0	0	0	0
Canada Invests in Innovative Clean Technology at the University of Alberta	0	1	1	0
New Multi-Use Airport Hangar Debuts Innovative Wood Design in Canada	1	0	1	0
Quebec and Canada Invest in Energy Efficiency in Industrial Facilities	0	1	1	0
Canada Raising Awareness for Electric Vehicles in Newfoundland and Labrador	1	1	0	0
Canada Invests in Electric Vehicle Grid Integration Pilot Project in Nova Scotia	0	1	1	0
Canada Invests in New EV Fast Chargers Across British Columbia	0	1	0	0



## Public Health Agency Of Canada

	Diagnosis	Proposal	Implementation	Testing & Evaluation
Government of Canada's first phase to easing border measures for travellers entering Canada	0	0	0	0
Government of Canada invests in Fetal Alcohol Spectrum Disorder Prevention in Atlantic Provinces	1	1	0	0
Government of Canada funds five new projects to encourage vaccine uptake in Canada	1	1	1	0
Government of Canada Announces Funding for COVID-19 Safe Voluntary Isolation Sites in Nova Scotia	1	1	0	0
Government of Canada Announces Funding for COVID-19 Safe Voluntary Isolation Site in Sault Ste. Marie	1	1	0	0
Public Health Agency of Canada to begin COVID-19 testing at land borders on Monday	0	0	0	0
Government of Canada invests \$53 million to address COVID-19 virus variants of concern	1	1	0	0
Minimizing the Risk of Exposure to COVID-19 in Canada Order (Quarantine, Isolation and Other Obligations)	1	1	0	0
Minimizing the Risk of Exposure to COVID-19 in Canada Order (Prohibition of Entry into Canada from the United States)	1	1	0	0
Public consultation on the Canadian Biosafety Standard (CBS), third edition	0	1	0	0

## Transport Canada

Government of Canada providing additional funding to support essential air services for remote communities in Yukon	1	1	0	0
Minister Alghabra marks North American Safe Boating Awareness Week and announces funding to organizations that promote safe boating practices	1	1	0	0
Minister of Transport proposes noise requirements for hybrid and electric vehicles to protect vulnerable road users	2	2	1	0
Government of Canada continues to strengthen measures to protect Southern Resident killer whales	1	0	0	0
Government of Canada announces one-year ban for pleasure craft and cruise vessels	0	0	0	0
Transport Canada introduces additional requirements to allow for the return to service of the Boeing 737 MAX	0	0	0	0
Interim Order No. 3 Restricting Pleasure Craft Navigation Due to COVID-19	0	1	0	0
Canada Gazette, Part I, Volume 155, Number 25: Regulations Amending the Canadian Aviation Security Regulations, 2012 (Various Amendments)	1	2	1	2
Canada Gazette, Part I, Volume 155, Number 24: Regulations Amending the Vessel Operation Restriction Regulations	1	1	1	0
Let's Talk: Modernizing the Marine Transportation Security Regulations	0	0	0	0

## 3.2 Common transparency shortcomings

Our assessment demonstrates that while there were some examples of good practice, there were some shared shortcomings across departments.

» **Sharing your workings, with referencing, is key to higher scores.** Too often, policies would either mention none of the underlying evidence behind the issue or proposed intervention at hand, or would fail to provide a reference or citation for any evidence mentioned. Properly citing and linking evidence is the key to higher assessment scores, and importantly, how the public can begin to explore the rationale behind a policy decision. The transparency framework requires evidence to be cited, linked to the relevant policy, and to be findable. This can be achieved via in-text citations, a reference list, or hyperlinks.

» **The transparency of evidence usage tends to vary by the medium or platform being used to announce the policy. But higher assessment scores do not necessarily require documents to be longer — policies can achieve high transparency scores without being lengthy.**

We found that policies with regulatory analysis statements generally scored higher. For example, Environment and Climate Change Canada received the highest scores, in part due to the detailed regulatory impact statements which accompanied a majority of policy announcements. In contrast, announcements about public consultations, as well as policy announcements in the Gazette were generally brief, and failed to achieve high transparency scores. But here, we stress that length is not a prerequisite of transparency. What is important is a clear chain of reasoning behind how evidence was used in the development of the policy.

» **Almost all policies scored very poorly (i.e., received a 0) in the testing and evaluation section.** We also note that an overwhelming

majority of policies did not mention any such procedures in place (e.g., success measures, or plans for testing/evaluation), let alone cite underlying evidence. Instead, measures for policy compliance were more likely to be stated. Testing and evaluation is important to determine how and when we will know if a policy has worked. Without this information in hand, it is unclear to members of the public how and when the effects of the policy will be observed.

» **Policies rarely explored the merits of alternative policy options, or acknowledged any absent, weak or contradictory evidence.** While properly citing and linking evidence is the first step, it is also important for policy-makers to assess the evidence they are choosing to use. This includes considering alternate policy options, as well as addressing any uncertainties, gaps or contradictions that may be present in the evidence base used to formulate the policy.

» **The transparency framework may benefit from additional refinement.** During this assessment, researchers noted that it was sometimes hard to differentiate between whether aspects of a policy would fall under the proposal or implementation section. This is a cause for ambiguity that will be addressed in future assessments.

Currently, there are a number of best practices on how individuals can use this framework to assess transparency, and how departments and agencies can improve the transparency of evidence usage in their policymaking processes.<sup>11,12,13</sup> We are engaging in discussions with members of the federal departments and agencies in this study to better understand what internal challenges may impact transparency. For example, there may be different standards for communicating about evidence across different departments and agencies, or it may be challenging to decide what is the appropriate level of detail to include in policy announcements. It may also be possible that the transparency of evidence usage fell short in the assessed policies because of extenuating circumstances posed by the COVID-19 pandemic.

## Next Steps

This report is the beginning of a much needed examination of the essential role of transparency in evidence-informed decision-making. Communicating about evidence has been a bumpy road in the context of the COVID-19 pandemic, making this work all the more timely. People around the world and from all walks of life have sought to understand the decisions that have impacted their health and livelihoods. These decisions have often sparked widespread confusion and at times, frustration, due in part to muddy communication around what evidence was used and how it informed these tough choices. The public demand for evidence has never been more in focus.

However, keeping this work at the federal level is insufficient in a federated democracy. In Canada, policy-making is not the sole responsibility of the federal government, but is distributed across federal, provincial, territorial and municipal jurisdictions, as well as Indigenous self-government. In some cases, policy is a shared domain, making it all the more important to understand the evidence being used in different jurisdictions. As a next step, we are turning our eyes to the provincial level.

In this next phase, we will assess the transparency of evidence usage on a subset of provincial governments. As in our study at the federal level, policies selected for the study will each be evaluated for what evidence is available to understand the policy's rationale, proposed intervention and how to assess whether the intervention will be effective. We will also collaboratively explore best practices and ways for governments within the federation to improve transparency.

Future work may also include spot-checks of the transparency of evidence usage at the federal level in alternating years to assess whether progress is being made. Assessments could also be extended towards a municipal level.

It should be noted that this transparency framework does not allow for an assessment of the quality of the evidence used, nor the merits of the policy. As Sense About Science noted in an earlier report, both a "well-founded policy and a poorly founded policy may both score well for transparency."<sup>11</sup> However, transparency is a prerequisite to assessing quality. Transparency of evidence usage in policy decisions is the prerequisite that can move us towards assessing the quality of said evidence in future work.

# Conclusions

When it comes to evidence-informed decision making, transparency is the persistently missing link between political commitments and public service mobilization. Since government policy impacts and is funded by the public, it is important for policy-making to be transparent. This gives the public the opportunity to understand what considerations led to a decision, and why.

In this study, we applied a transparency framework, adapted from the UK to the Canadian context, to assess the transparency of evidence usage in policies across the Government of Canada. Overall, policies did not achieve high scores using the transparency framework, with limited or no transparency of evidence usage behind a majority of policy decisions in the study.

The next stage of this project will extend this transparency assessment to the provincial level. We will also continue discussions with governments across the Canadian federation to better understand what challenges may impact transparency of evidence usage in policy processes.

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# Appendix: List Of Policies Assessed

## 7.1 Agriculture and Agri-Food Canada

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