

The Register of Electors Project

A Report on Research and feasibility

Submitted to
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by the
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Ottawa
March 1996

Table of Contents

Executive Summary5	Elector information20
Acknowledgements7	Privacy21
1. The Register of Electors Project	9	Reducing the electoral calendar ...	21
What is a register of electors?	9	New revision process	22
Elector registration: the current environment9	5. Evaluation of Data to Maintain the Register25
Mandate and scope of the register project	10	Data quality25
Guiding principles	11	Assessing the reliability of data sources for renewal26
2. Experience in Other Jurisdictions ...	13	Keeping the register current	26
The Canadian experience	13	The best data sources26
Lessons learned from other countries	14	Conclusions about reliability	28
Conclusions	14	Accessibility of data sources	28
3. The Business Case	15	Privacy and security28
Aims and approach	15	6. Alliances and Partnerships31
Register development and first event	15	Consultations31
Subsequent events	17	Level of interest31
Other benefits	17	Opportunities for partnerships32
4. The New Business Process	19	7. Proposed Implementation Plan35
Options for building a register	19	Timetable35
Options for a last enumeration	20	The next steps36
The elector registration process by mail20	8. Conclusions and Recommendations39

Executive Summary

A national register of electors is both feasible and cost-effective. A register would be an automated list of all Canadian electors, which could be shared among electoral jurisdictions, maintained and updated using information from existing data sources.

Elections Canada launched the Register of Electors Project to examine the feasibility of setting up and maintaining an automated national register of electors.

This report to the Chief Electoral Officer of Canada describes the purpose and results of that examination; it concludes that a register is both feasible and cost-effective. It also offers a vision of how the register could become a reality, by outlining the steps required to implement the concept and by making recommendations for advancing the project.

A national register of electors would offer several significant benefits to Canadians in a time of severe fiscal restraint and changing social and demographic conditions:

- A national register, properly maintained between electoral events, would eliminate the need for a door-to-door enumeration during a federal electoral event and provide for elector registration at significant cost savings.
- Such a register would allow election administrators to make available to parties and candidates a preliminary list of electors for each electoral district immediately after the call of an election or referendum.
- Existing information technology would allow the contents of a national register to be shared with other Canadian jurisdictions, while safeguarding the privacy of electors, and eliminating the need for the

current duplication of effort and expense of registering electors at the national, provincial, territorial and local levels of government.

Conclusions of the report

The project team came to six main conclusions:

- A national register of electors is both feasible and cost-effective.
- With a register, the minimum election period could be reduced from the current 47 to 36 days.
- The best sources to update information on electors who move, Canadians turning 18, people who die and new Canadians would be Revenue Canada, provincial and territorial driver's license files, provincial and territorial vital statistics files, and files from Citizenship and Immigration Canada. A register could be maintained between electoral events at a targeted reliability level of 80%, the level necessary to begin conducting an electoral event, by importing electronic data from existing sources.
- There is support for the concept of a shared national register among a growing number of provincial and territorial electoral agencies. Furthermore, discussions with potential suppliers of data are very promising. Moving to a shared register would eliminate repeated enumerations of the same electors by different levels of government.
- Legislative changes to the federal elector registration system and to authorize the Chief Electoral Officer to enter into data-sharing arrangements with other jurisdictions are necessary before a register could be implemented. Changes are also necessary to the ***Income Tax Act***.
- The registration of electors at the first electoral event at which a register would be

in place would cost approximately the same as it would using the present registration system - **including** the \$9.3 million estimated cost of developing the new system - provided that Elections Canada finalizes agreements with interested partners in building the register, that a new revision system is implemented, and that a reduced elections calendar is in effect. For each subsequent federal event, cost avoidance in the order of \$40 million could be realized. With each province and territory that decides to participate and share costs, the costs to the taxpayer would be further reduced.

The next steps

To implement a national register of electors ***in time for a possible fall 1997 electoral event***, the project team has identified three key issues that would first have to be addressed:

- new legislation to allow the building and maintenance of a national register of electors would need to be in place by the end of June 1996; amended legislation would allow Elections Canada to shorten the electoral calendar and to streamline the process for revising the lists of electors
- the data required to build the initial register would have to be gathered in the spring of 1997, through partnerships established with key provinces - Ontario, Alberta, British Columbia and Newfoundland - and an elector registration process conducted by mail in those provinces and territories where no such partnerships would be in place, and
- the required systems and procedures relating to the establishment and maintenance of a national register of electors would have to be developed and implemented by the summer of 1997.

Acknowledgements

The project team is indebted to many organizations and individuals for the excellent co-operation that we received throughout the research and feasibility stage of the project. Their constant encouragement and tangible support were crucial to the successful completion of this phase. Team members were continuously impressed by the dedication and enthusiasm shown by so many public servants of both provincial and federal organizations who put in extra effort to assist Elections Canada in its initiative.

We would like to acknowledge formally the assistance of staff in the provincial and territorial motor-vehicle, health, vital-statistics and property-assessment organizations across the country who completed surveys so that we could gain insight into the type and extent of information that is collected. We are further indebted to these same organizations as well as the electoral organizations in Manitoba, New Brunswick, and Newfoundland for providing us with test data for assessing the contribution that various files could make to the maintenance of a register of electors. We wish to thank officials from the Ontario Ministry of Finance and the Chief Electoral Officers and their staff in the provincial and territorial electoral offices who took the time to meet with us to discuss the register, explain their registration procedures, and answer our numerous questions.

We are grateful to the Canadian Council of Motor Transport Administrators for allowing us to address their annual meeting in June 1995 and for opening so many doors. In a similar vein, we appreciated the opportunity to address the Vital Statistics Council for Canada and the Canadian Directors of Property Assessment and to meet their members. We were fortunate in

the assistance we received from the Canadian Federation of Municipalities, and for being able to address the Association of Big City Mayors, and were very encouraged by their support. In particular, we wish to thank the City of Ottawa for the loan of one of their key staff members. Our thanks go to the Canadian Institute for Health Information for facilitating contact with provincial and territorial health departments.

At the federal level, we are particularly indebted to staff at Statistics Canada and Revenue Canada for their efforts in conducting tests on our behalf and meeting our very tight deadlines. We also thank Citizenship and Immigration Canada for their assistance in our research, and officials of Canada Post Corporation for assistance in defining the options for building the register. We are grateful as well to the Office of the Privacy Commissioner for providing us with a "privacy advisor", who participated in several workshops and offered us sage advice in a very important and sensitive area.

We would also like to acknowledge the helpful contribution made by many individuals and companies in the private sector. They were of invaluable assistance in developing the necessary systems and software to support our research and provided insight and advice in many strategic, operational and costing aspects in this phase.

On the international level, we would like to thank our colleagues in New Zealand, at the Australian Electoral Commission, and at the United States Federal Election Commission for their assistance in giving us a better perspective of the voter registration process in their countries.

We wish to express our gratitude to all the individuals who assisted us in our work during the research and feasibility phase.

The Register of Electors Project

Last, but by no means least, the project team thanks our Elections Canada colleagues, including returning officers, who were always available to provide

expertise, advice, effort and constructive feedback on the team's proposals and working papers. Please accept our thanks, one and all.

1. The Register of Electors Project

What is a register of electors?

A register of electors is a regularly updated database of information relating to persons who are qualified to vote, with links to individual addresses and electoral districts. It is used to produce the preliminary list of electors for an electoral event: a general election, a by-election or a referendum. A register is only effective, however, if reliable data are available to update it regularly and at a reasonable cost. Storing and updating the necessary information is most efficient and economical if the list and the sources of data to maintain its accuracy and reliability are automated (as a computer database). The existence of computer software for managing large amounts of information is therefore essential.

A federal register of electors could be used to produce preliminary electoral lists, thereby eliminating repeated door-to-door enumerations. Opportunities for electors to make revisions to the list during the electoral calendar period would continue to exist. A register could be updated regularly between electoral events, and could be designed with the capacity to be shared with provinces and territories and, potentially, with their municipalities and school boards.

Elector registration: the current environment

A number of factors have combined to make the register of electors a project worth pursuing.

Enumeration outmoded

The status quo in elector registration, in particular the current enumeration process, no longer works efficiently. There is ample evidence - including testimony to the **1991** Royal Commission on Electoral Reform and Party Financing - to the effect

that it has become increasingly difficult for local political party associations and election administrators to find sufficient numbers of qualified people to act as enumerators at electoral events. Similarly, electors' fears for their personal security are making it increasingly difficult for enumerators to gain admittance to the homes of electors in order to gather the required enumeration data. In addition, altered lifestyles and working patterns in recent decades have made it increasingly difficult to find some electors at home either during the day or in the evening.

Duplication of enumerations and costs

The multiplicity of enumerations, whether federal, provincial, territorial or local, is considered unacceptable by taxpayers in these times of severe fiscal restraint. The gathering of the same (or similar) personal information by several different electoral jurisdictions, and the associated costs, are unnecessary and unjustifiable.

Door-to-door enumeration for each election is expensive: the single most costly part of conducting an election. Costs are incurred both at the federal level and by provinces, territories, municipalities and school boards that conduct enumerations, with the same taxpayers bearing the cost in each case.

Voter registration presents an opportunity to take relatively similar processes and harmonize them across the country at several jurisdictional levels, while providing for possible differences in elector qualifications in the various jurisdictions (for example, length of residency and the eligibility of British subjects).

A shorter election period

A strong and recurring message heard over the years and repeated before the Royal Commission on Electoral Reform and Party Financing has urged the shortening of the

electoral calendar. This was achieved on two occasions in the last **15** years by fixing the minimum period at 50 days, then at 47 (in 1993), but as long as an enumeration is required at an election, it is not feasible to reduce the election period any further.

Enumeration is time-consuming. Up to 110,000 enumerators have to be hired and trained and their work monitored, all in the first 19 days after a federal electoral event is called. Electoral lists for each electoral district have to be compiled and checked. The current minimum calendar of 47 days for an election is necessary because of the time required to collect the information on more than 18 million electors in seven days by conducting a door-to-door enumeration, and to produce the preliminary list of electors in a further three days.

A register of electors could permit a further significant shortening of the period.

Existing foundation of automation

The rapid and consistent automation of systems at Elections Canada in the last six years, spurred by the Auditor General's recommendation in 1989 that Elections Canada should make greater use of technology to streamline and facilitate electoral processes, means that a strong foundation for a register of electors is already in place.

During the same period, Elections Canada undertook a prototype project with Elections British Columbia to examine the technical feasibility of constructing a shared computer system to maintain and produce lists of electors for federal, provincial and municipal elections. The project demonstrated the technical feasibility of an address register (a computerized file of all residences), with each address described electronically in such a way that addresses could be sorted by electoral district and polling division. If boundaries between electoral districts or polling divisions

changed, an amended list of addresses could be printed out automatically. A national register of electors would build on this concept, by collecting information about the qualified voters at each of the addresses and linking them to a digitized electoral map.

Elections Canada has also been working with Statistics Canada and Natural Resources Canada to develop an automated geographic information system and to identify areas of mutual interest and possible co-operation. For example, work on a master address list could facilitate both census operations and a national register of electors.

The experiences of Elections Canada in the automated production of the list of electors in returning offices across Canada in 1992 and 1993, the implementation of a national address register based on Elections Canada's electoral geography system, and the interest shown during the course of the project team's research by provincial and territorial counterparts in sharing elector information all point in one direction: a national register of electors.

Mandate and scope of the register project

After the 1993 general election, Elections Canada established a Register of Electors Steering Committee to co-ordinate discussion of a register-based system of elector registration. In late 1994, the Steering Committee assigned a special project team to undertake detailed research and to assess the feasibility of a national register. The research and feasibility phase included examination of the costs and benefits of a register, extensive work on new processes and procedures, evaluation of sources for updating data, consultation with potential partners, and feasibility assessment. The

project team completed this phase in December 1995.

On 14 December 1995, the Chief Electoral Officer of Canada presented the project team's findings to the House of Commons Standing Committee on Procedure and House Affairs. The Committee concurred in the value of moving to a register system, enthusiastically supported the approach proposed for its implementation, and agreed that Elections Canada should immediately prepare a report in the form of draft legislation to begin to develop the administrative mechanisms and systems needed to use a register in the fall of 1997.

The input of the Standing Committee is critical to the success of the register project. From the outset, the project team worked closely with the Committee, consulting them on major activities and incorporating their comments and suggestions into the team's reports and planning. The team based its approach on the Committee's assessment of which areas should be studied, focusing the project's activities where they would be most effective and ruling out ideas the Committee deemed impractical, such as the implementation of elector identification cards.

The scope of the project encompassed four principal components:

- ***the business case component:*** comparing the cost of a register with the cost of door-to-door enumeration, the investment required and how long it would take to recoup that investment, and the advantages and disadvantages of moving to a register system
- ***the new business process component:*** investigating the processes and procedures needed to establish and use a register, and determining their operational effect on Elections Canada, returning officers, other

electoral participants and stakeholders, and the election calendar

- ***the data renewal component:*** investigating existing public- and private-sector data sources for data quality, coverage of the electoral population, and suitability for updating a register, and
- ***the alliances and partnerships component:*** exploring support for a register in other Canadian jurisdictions, and developing roles and responsibilities for those that would participate in building, using and maintaining a register.

The project team's mandate also included preparation of a proposed implementation plan for moving from enumeration to a register, if the business case was strong and the register proved feasible.

Guiding principles

Elections Canada recognized from the beginning that if a register were to find acceptance as a means of resolving problems with door-to-door enumeration and of realizing other benefits, it would have to be more than just feasible and cost-effective. It would also have to preserve certain principles and characteristics of the Canadian electoral system.

To ensure that these requirements were met, the project was guided by the following six principles:

1. The integrity of the electoral process would have to be maintained. Canadians are justifiably proud of their electoral process and confident of its capacity to safeguard their fundamental democratic right to participate in open and free elections. A register system would therefore have to meet the test of maintaining the fairness, transparency and openness of the process, and ensure that everyone qualified to vote had every opportunity to exercise that right.

2. The onus would have to remain on the electoral system to reach out to electors, just as it does through enumeration.

Making sure that it is easy to register to vote is a firmly entrenched feature of Canada's electoral system and one that Canadians value.

3. The information (data) in any such register of electors, together with that obtained during the new revision process, would have to be **at least** as reliable as the most reliable data that is collected through the present door-to-door enumeration process. (The reliability of current registration data varies between more stable, rural regions of Canada and the more highly transient metropolitan regions.)

4. Electors' privacy would have to be respected and the confidentiality of their personal information safeguarded. Electors would have to be assured that the information obtained about them would not be used for any other purpose than electoral.

5. Existing reliable data sources would have to be used, to avoid creating new data banks and adding to the costs already being incurred to gather information and keep it up to date, and to avoid any further imposition on Canadians in gathering personal information which is already held in a number of existing sources.

6. Research would include investigation of the potential for sharing the register's data with other jurisdictions, to reduce further duplication and increase cost-effectiveness.

2. Experience in Other Jurisdictions

The project team's research revealed that most western democracies use permanent voters lists of one kind or another. The registration systems in Great Britain, France, Australia, Germany, Finland, Sweden and the U.S.A. were examined.

Not surprisingly, in countries where registration is compulsory (such as Australia and Germany), or the lists are produced from general population registers (as in the Scandinavian countries), the voters lists tend to be more complete because their coverage of the electoral population is greater. Where registration is voluntary, as in Great Britain, some systems have been criticized as presenting obstacles or deterrents to registration, such as complex, inflexible or inaccessible registration procedures. In France, voter registration is a blend of state involvement and voter responsibility because voter registration is voluntary, but there is close co-operation between local and national authorities in continually updating the list.

As the Royal Commission pointed out, most western countries that maintain permanent voters lists use them for elections at different levels of government. Permanent voters lists in Great Britain, Germany and France are used for local, national and European parliamentary elections. In Australia, the electoral roll is used for national elections, for elections in four states, for referendum elections and for elections to resolve union disputes. The frequent use of the lists increases their cost-effectiveness and provides more opportunities to keep them current and accurate.

Australia provides some basis for comparison of data on cost-effectiveness, because maintaining its permanent electoral roll in

four states and two territories is the responsibility of the Australian Electoral Commission. The costs of voter registration per voter are comparable with those in Canada, even though the administration of the Australian electoral roll relies not only on an extensive permanent bureaucracy, but also on a biennial review that is similar to enumeration in Canada.

The Canadian experience

In Canada, experience with permanent lists has been limited. At the federal level, a system was introduced in the 1930s, but the government quickly abandoned it as too expensive to maintain. At that time there was no opportunity for automation and limited possibilities for easily storing the information.

In Canada today, only the province of British Columbia maintains a permanent voters list system. The system has been in existence since the 1940s and automated for more than a decade. In 1995 a new program was put in place as a result of revised legislation; since September 1995 the British Columbia register has been updated using information in provincial driver's license files, as well as information provided by electors. Newfoundland has a permanent voters list.

In 1995 the province of Quebec passed legislation to institute a permanent list, and collected the information for its creation in a door-to-door enumeration conducted just before the 1995 referendum. The province is currently working on a process that will allow updating of the list (basically using health-insurance data) between electoral events.

Every three years, Ontario's Ministry of Finance uses its property-assessment database as a basis for a mail-out enumeration, from which municipal voters lists are

subsequently produced. Ontario still enumerates for provincial elections, as do the other remaining provinces and territories.

Lessons learned from other countries

Australia and Great Britain have been examining alternatives to their existing systems to maintain their registers exclusively for electoral purposes. The Australian Electoral Commission is considering alternatives to updating their electoral roll, and is having discussions with Australia Post, which is in the process of establishing a national address base.

Registers of electors extracted from existing public data banks such as general population registers are of greater reliability. Finland, Sweden and Germany, for example,

maintain registers that allow sharing of personal data between government agencies.

Conclusions

In the Canadian context, the experiences of British Columbia and Ontario (in municipal elections) have demonstrated that there are other effective and publicly acceptable methods of registering electors besides door-to-door enumeration.

A foundation already exists for sharing the work of building a register or maintaining it between electoral events. Work to make the voter and information requirements more compatible across all Canadian jurisdictions could significantly enhance the potential for joint partnerships.

3. The Business Case

The business case demonstrated that a register offers significant opportunities for cost avoidance. The first electoral event using a register would cost approximately the same as using the present system, including the estimated development costs of \$9.3 million. For each subsequent electoral event, cost avoidance in the order of \$40 million or more is projected.

Aims and approach

One of the primary issues for the project team was examining the business case for a register of electors: that is, to determine whether the initial cost of establishing the register and the continuing costs of maintaining it were justifiable in light of the benefits that were expected from it. The business case research had two aims:

- to determine the cost of establishing and using a register of electors compared to the costs of door-to-door enumeration and revision, and
- to evaluate the cost avoidance and other benefits of establishing and maintaining a register.

The project team developed costing scenarios based on different operational models to build and maintain the register. The team identified the most effective model based on the following conditions:

- before the next electoral event, Elections Canada would propose conducting a national elector registration process by mail, including a joint enumeration with the Ministry of Finance of Ontario (for their 1997 municipal elections) and with Newfoundland and Alberta; it would also propose using the data contained in British Columbia's existing permanent voters list system

- under a register scenario, elections would be conducted using a minimum 36-day calendar as opposed to the current 47-day calendar, and

- the current revision system would be replaced by a new revision process.

The approach to costing also rested on four general premises:

- the base for the business case would draw on cost results obtained during the 1993 general election, where a one-year-old official list of electors produced at the 1992 referendum was used as a preliminary list in all of Canada except Quebec (which ran its own referendum)
- the approach to register costing should be conservative, and whenever appropriate, worst-case options should be explored
- cost projections for subsequent electoral events would be adjusted for annual increases in the consumer price index (2.5%) and for population growth (1.2%), and
- other than partnerships for building the register, only federal-level costs and cost avoidances would be taken into account for the business case.

Register development and first event

The following table shows the results projected for the next electoral event. It compares the costs for key components of the current enumeration-based system to those of the proposed register of electors system in current dollars. The research conducted by the project team concluded that the costs of the current door-to-door enumeration system and of the proposed register of electors would differ by only \$0.8 million at the next electoral event (including \$9.3 million start-up costs). The start-up costs comprise project and management support, and design and construction of the necessary systems to implement the register.

Cost comparison of current registration versus the register system

Next event (\$ current million)

	Current system	Register	Balance
Door-to-door enumeration	61.3		
Current revision process	14.1		
New revision process	(4.9)		
Total			70.5
Development		9.3	
Enumeration by mail		46.9	
Current revision process		47.0	
Subtotal		103.2	
Provincial partners		(13.9)	
36-day calendar		(7.1)	
New revision process		(10.9)	
Subtotal		(31.9)	
Register net cost			71.3
Cost difference			(0.8)

Cost comparison of current registration versus the register system

Subsequent event (\$ current million)

	Current system	Register	Balance
Door-to-door enumeration	68.3		
Current revision process	15.7		
New revision process	(5.5)		
Total			78.5
Register update between events		8.0	
Current revision process		52.6	
Subtotal		60.6	
36-day calendar		(9.1)	
New revision process		(12.2)	
Subtotal		(21.3)	
Register net cost			39.3
Cost difference			39.3

Note: figures may not add up due to rounding.

Subsequent events

With the proposed register system, the cost avoidance for the second electoral event is projected at \$39.3 million, including \$8.0 million to keep the register up-to-date between events. This cost avoidance in the order of \$40 million will also apply to each subsequent event.

There are, therefore, immediate benefits in moving to a register of electors even at the federal level only. With provincial and territorial participation, the cost avoidance to taxpayers would be even greater.

Other benefits

The project team identified other benefits that strengthen the business case for moving to a register of electors, including:

- electoral lists would be available to candidates and political parties earlier in the election calendar
- electoral information would be of higher quality, because preliminary lists of electors would be produced over time and not in the tight time frames currently required during an electoral event, and
- a strong foundation for further development of computer-assisted electoral processes would be built as technologies and public familiarity evolve.

The effects of these benefits are enhanced if the register were to be used by other levels of jurisdiction to conduct their electoral events.

4. The New Business Process

The new business process component of the project determined that the best way to establish a register of electors would be an elector registration process conducted by mail in early spring 1997 while an election or referendum is not in progress. The electoral calendar could be reduced to 36 days, and the process of revising the electoral lists could be easier, more convenient and less costly.

The team reviewed the options for the initial building of a register and the implications of using a register, particularly the implications for the electoral calendar and the process of revising the electoral lists.

Working groups were formed to consider four broad issues:

- the options for building a register: updating an existing list, using existing administrative data sources, or conducting one last enumeration
- the options for reducing the electoral calendar
- streamlining the revision of electoral lists conducted during an electoral event, and
- assessing the effect of a register on the work of the returning officer.

Options for building a register

Three main options for the initial building of a register were considered:

- updating the final voters list from the 1993 federal election
- using existing sources of administrative data or provincial and territorial electoral lists to assemble a register, or
- conducting one last enumeration for the specific purpose of building a register.

The group recommended conducting one last enumeration and dismissed the first two options for the following reasons:

- The 1993 list -which had actually been compiled in 1992 and revised in 1993 - would be four years old by the time the process of building the register could begin. Research conducted by the project team (described in detail in section 5) confirmed that the reliability of data on electoral lists would fall to less than 50% after four years.
- The current provisions of the ***Canada Elections Act*** prohibit re-use of the list after more than one year and do not allow for updates.
- The information collected for the 1993 list was not comprehensive enough to maintain a register. Insufficient identification information was collected: list maintenance would require additional data (such as date of birth).

Building a register from existing administrative data was ruled out, since no single data source or combination of readily available sources was capable of confirming citizenship, which is essential to establishing voter eligibility. This includes the 1996 census data, where citizenship will be identified for only 20% of respondents.

Although seven jurisdictions have conducted elections since the 1993 federal election, electoral lists from four provinces covering 46% of the electorate are either inaccessible because of legislative provisions, or they do not contain the current information presently collected by Elections Canada (such as names, surnames, gender and residential and mailing addresses). Furthermore, no jurisdictions other than British Columbia and Quebec gather the date of birth of electors, which is essential to maintain a register.

Options for a last enumeration

Choosing the option of conducting one last enumeration would present three further sets of options, namely, whether or not:

- to conduct the last enumeration inside or outside an electoral event
- to conduct the enumeration by going from door to door or by using a mail-out and mail-back method, and
- to process the resulting information centrally or in the returning offices.

The team concluded that the best approach would be:

- to conduct an elector registration process outside an electoral event
- to use a mail-out and mail-back approach
- to manage the process centrally but process the resulting data regionally, and
- to open returning offices for follow-up, but not for capturing data.

This combination would provide the best results in the context of the quality of the end-product, ease of management and cost considerations.

An elector registration process in early spring 1997 and implemented over a two-month time frame outside of an electoral event would facilitate planning and control over costs. It would open up the potential for partnerships with other jurisdictions and for taking data-sharing needs into account when determining what information to collect and in what form. The spring of 1997 was deemed the best timing since it would allow for all systems and infrastructure to be ready. The redistribution process with 301 electoral districts (effective in January 1997) would be in place, with the new returning officers all appointed and trained, and efforts to conclude data

sharing and partnership arrangements could be completed.

The elector registration process by mail

In reaching their conclusions about procedures for a mail-out and mail-back registration methodology, team members worked closely with Canada Post Corporation to take advantage of their experience and expertise in large-scale operations of this type and the possibilities that electronic mail products represent. They reviewed the experience of the Ontario Ministry of Finance in conducting mail enumeration for over 800 municipalities across the province using the property-tax assessment rolls.

The Ontario experience over three events showed that a mail-out and mail-back approach could be successful and achieve a high rate of return (starting with an average range of between 70% and 75% from the initial mail-out without follow-up) if it were accompanied by an effective media campaign, and if solid follow-up procedures were in place to deal with incomplete responses, non-responses, and addresses missed during the initial mail-out and in high-mobility areas, which tend to have lower response rates.

The additional information needed for a register could be collected more easily by mail than by door-to-door canvassers. The resulting data would be computerized regionally, using a combination of existing imaging technologies (scanning) and conventional keyboard entry, instead of capturing data in 301 returning offices.

Elector information

A further consideration in building a register is what additional information should be collected during the proposed elector registration process by mail. Two issues

emerged as important: the additional or different information needs of potential partners, and the additional information needed for register maintenance and use.

Saskatchewan, Prince Edward Island, New Brunswick and Nova Scotia currently have unique needs, such as collecting the occupation of electors and including British subject status as a qualification for voting.

Information to identify an elector more precisely and to facilitate the maintenance of the register would have to meet several criteria: it would have to be acceptable to Canadians, readily available, and constant over time; it would have to be present in the sources that would be used for updating; it would have to be available for use without difficult or complex legislative change; and it would have to have a low level of duplication (preferably it would be unique).

The use of social insurance numbers was considered, but rejected. Access to SINS is presently limited to the administration of federal social programs, and to those departments that have a legislative basis to use the SIN. In 1988, the unauthorized use of the SIN and concern with the loss of individual privacy was raised in the House of Commons. The House directed the Office of the Privacy Commissioner and the Treasury Board Secretariat to eliminate the unauthorized use of the SIN within the federal government, and in doing so, to set an example to provincial and other levels of government, and to Canadian corporations. In addition, consultations with the Privacy Commissioner's staff revealed public concerns over the use of the SIN as a unique identifier.

Date of birth and name meet all the criteria for identifying information. However, the combination is not unique: more than 10% of Canadians have the same family name

and date of birth as at least one other Canadian, for example. It would be possible to resolve most of this duplication through the use of given names and address information. In addition, links between identifying information on the register and unique identifiers found on administrative data sources (such as driver's license numbers) would be used to facilitate maintenance of the register.

Privacy

Members of the working group were acutely conscious that privacy and consent are sensitive issues in building, using and maintaining databases such as a register. They reviewed how other jurisdictions handle these issues, and consulted with the federal Privacy Commissioner's Office throughout the study. Should register implementation be pursued, it would be important to tell Canadians why the information is being collected at every step of the way, to give assurances that register information would be used and shared with other jurisdictions for electoral purposes only, and to reassure Canadians that the information would be properly protected.

During the proposed elector registration process by mail anticipated for the spring of 1997, Elections Canada would produce a household flyer addressing:

- the privacy and confidentiality of information provided by electors
- Elections Canada's intention to share information with other jurisdictions for electoral purposes only, and
- procedures for Canadians who wish to communicate with the Chief Electoral Officer to obtain further information or to opt out of the register.

Reducing the electoral calendar

To consider whether the calendar could be shortened, a working group broke down the

electoral process into components, and looked at how much time each activity consumed under the existing 47-day calendar. They then compared the results to the time that would be required to carry out the same activities (if they were still needed) using preliminary voters lists generated from a register, rather than assembled through enumeration.

The result was clear: election activities could be completed within a 36-day calendar, a reduction of 11 days. Three implications would follow:

- planning by returning officers would be crucial. Returning officers would have just three days to open an office and recruit and train staff before revision began, rather than the 12 days that are available before enumeration starts under a 47-day calendar. Elections Canada headquarters staff would be required to transmit the preliminary voters lists generated from the register to returning officers immediately after the issuance of the writ, so that they could begin revision and distribute the lists to candidates shortly after the issue of the writs
- nomination day is proposed to be set at 21 days before polling day under a 36-day calendar, and accordingly broadcasters would see the period in which to allocate 6 1/2 hours of time to political parties reduced by one week, and
- the time frame to register and vote would be much tighter for those Canadians living abroad and not already registered on the Elections Canada International Register.

The effect of these implications was thoroughly considered, and the project team concluded that proper planning and effective consultation with concerned parties would result in minimal difficulties being experienced.

New revision process

During an election period, revising the register would in effect shift from Elections Canada headquarters to the 301 returning offices across the country.

In the past, the volume of revisions to the preliminary voters lists has been approximately 3%, mostly adding electors missed during door-to-door enumeration.

In 1993, the volume of revisions rose to approximately 13% because the preliminary list was the year-old final list from the 1992 referendum. Most of the revisions involved electors who had moved.

Building on the 1993 experience and using it as a framework to streamline revision, the working group concluded that revision should be simplified, more accessible to electors and less costly. They recommended:

- that targeted revision be retained and improved to collect names for the list in areas with large numbers of high-rise buildings with high rates of mobility, in chronic-care institutions, on university campuses, and in new subdivisions; various strategies could be used, including a mail-out and mail-back to target addresses, and setting up registration centres in public areas
- that revision forms also be sent and received by mail or by facsimile; if time does not permit, personal visits would be retained
- that it be easier and more convenient for electors who have moved to transfer their registration from one list to another, or to correct information on the list
- that sittings for revision and the position of revising officer be abolished, and that any objections be handled by the returning officers (in the 1993 election, returning

officers were obliged to hire more than 3,000 revising officers who handled few revisions during sittings, and only some 20 objections were filed across the country), and

- that all deputy returning officers at advance polls be given the authority to accept new registrations, and that the system also be extended to the advance polls.

A register, a new revision process, and a shorter calendar would all affect the returning office organization, including the number and type of staff needed to implement the new revision process, their training needs, their working hours, automation and other technology requirements, and office space and equipment.

5. Evaluation of Data to Maintain the Register

The data renewal component demonstrated the feasibility of keeping a register up to date between electoral events, using a combination of existing public information sources: Revenue Canada and Citizenship and Immigration Canada data, and provincial and territorial driver's license and vital-statistics files.

In researching the data renewal component, the team examined the options for maintaining a register between events, including:

- the most effective way of keeping the register up to date between events
- the types of changes that would affect the information kept in the register and the associated systems
- the benefits and limitations of using various data sources for updating the register, and
- the accessibility of the sources.

Finding answers was crucial, because Elections Canada must be ready to conduct an event at any time, and because some 20% of the information on the voters list changes every year. The following table indicates the major causes of changes to voters list information, and the approximate number of electors affected annually.

Demographic factors that require updating the register

Factor	Approximate annual volume	% of electors
Moves	3,200,000	16%
Turning 18	380,000	2%
New citizens	200,000	1%
Deaths	195,000	1%

Data quality

The quality of information in a register of electors involves three factors:

- coverage: the ratio of the number of elector names in the register to the total number of people qualified to vote
- currency: how up to date the information in the register is, and
- accuracy: the ratio of the number of correctly entered names, addresses, and other elector-specific information to the total number of names in the register.

For data renewal, a good data source would be one that is:

- reliable: it covers the information needed for the register for a high proportion of the electorate, it is up to date, and it is accurate, and
- accessible: its format would be compatible with the proposed register system, there would be no legislative restrictions on its use, and it could be acquired economically.

To determine whether the information in the register, once established, could be kept current, the team's research centred on two areas:

- whether the idea of keeping a register current by updating it with data from existing administrative sources would, in fact, be feasible, and whether the information in the resulting register would be of sufficient quality to meet established standards, and
- which data sources would be most suitable, from the perspectives of coverage, the kinds of information collected, the reliability of information, and access to the information the sources contain.

A reliability target was set at 80%, based on the 1993 experience of successfully conducting an election using an unmaintained

one year-old list that had declined to an average 80% level of reliability.

Assessing the reliability of data sources for renewal

To determine the most suitable data sources, they were assessed by:

- undertaking computer tests of data sources and proposed updating methods from New Brunswick and Manitoba, and examining automated data sources for Newfoundland
- conducting surveys of potential data suppliers to gauge the nature of the data they collected and whether it would be suitable for register purposes, and to determine whether the findings from the computer tests could be replicated across the country, and
- considering the accessibility of data: the rules associated with using data from a particular source, any legislative or administrative impediments to using the data, and the cost.

The tests consisted of updating the voters list from the 1993 federal election, using various combinations of proposed data sources, and comparing the result with the municipal electoral list for the City of Winnipeg compiled from the 1995 Manitoba provincial election, and the 1995 provincial lists of electors in British Columbia. Similar testing was done in New Brunswick.

Keeping the register current

To determine which data source or combination of sources would offer the best means of keeping the register current, the project team examined federal, provincial, and commercial databases:

- at the federal level, the team considered data from Citizenship and Immigration Canada (the only source for information on

new citizens), Revenue Canada (for changes of address, name changes, persons turning 18, and deaths), and the Canada Post Corporation (for changes of address)

- among the provincial and territorial data sources considered were driver's licenses (changes of address, persons turning 18, and deaths), health (changes of address and persons turning 18), vital statistics (the primary source for deaths), and property-assessment data (new addresses), and
- a commercial database of names, addresses and telephone numbers was examined to see whether it could be part of a verification system for the register.

The best data sources

Electors who move

Keeping track of electors who move cannot be done using a single source; it requires a combination of data from Revenue Canada, provided once a year, and from provincial driver's license files, updated regularly throughout the year.

The quality of the data in Canada Post Corporation's change-of-address system was excellent, but coverage of the electorate was incomplete; only some 25% of moves were identified in the testing, highlighting the fact that not everyone who moves makes use of the system.

Canadians who turn 16

For changes due to persons reaching the voting age of 18, provincial and territorial driver's license data, supplemented by Revenue Canada data, proved to be the best source of information.

New citizens

For information on new citizens, the federal Department of Citizenship and Immigration was the only automated source of information on new Canadians.

Deaths

Provincial vital-statistics records were judged the best source for names that should be removed from the register because of the death of electors.

Provincial and territorial sources only

Although provincial and territorial data sources rated reasonably well for tracking people turning 18, deaths of electors, and changes in the master address list for all households in Canada, they rated less well for tracking voter mobility. Projecting the results nationally, the combination of driver's license and health data sources would capture only about 55% of voter mobility. The reliability of a register maintained using these data sources for mobility and the best data sources for other demographic events would be about 70% after five years.

Federal sources only

Revenue Canada data and Canada Post Corporation's change-of-address system produced somewhat better results. The national projection of the reliability of the register maintained using these data sources for mobility, however, fell below the 80% target after five years.

Combination of provincial, territorial and federal sources

If Revenue Canada and provincial driver's license records were used to track mobility, the reliability level of the register is projected nationally to meet the target of 80% over five years.

Other data sources examined

The other data sources examined had various drawbacks. Provincial health-insurance data covered most of the electorate, but often contained out-of-date address information and was more difficult to access because of legislative restrictions. Property-assessment records provided owner

information for each assessable address, but information on each individual living at each address was not available. The commercial databases were not suitable because of missing or out-of-date information or because information was collected on households, not individuals.

The team reached two broad conclusions:

- it was clear that no single data source could meet all the requirements for keeping the register at the reliability target, and
- a combination of data from federal, provincial and territorial public data sources produced the best result in keeping the register accurate and up to date.

The following table summarizes the best data sources for each of the main causes of changes in a register:

Best sources to update the register

Cause of change	Source
Moves	Revenue Canada and provincial and territorial driver's licenses
Turning 18	Provincial and territorial driver's licenses and Revenue Canada
New citizens	Citizenship and Immigration Canada
Deaths	Provincial and territorial vital statistics

The project team concluded that maintaining a register of electors by updating it regularly from existing data sources would be feasible, and that it would achieve the level of reliability required to safeguard Canadians' right to vote and to ensure effective election operations.

Conclusions about reliability

The research showed that without regular updating, the reliability of the register would decline by about 20% in the first year and slightly more than 60% over five years.

The following graph shows the forecast reliability of data over five years using updated information from Revenue Canada and provincial and territorial driver's license files, and the decay in reliability with no updates over the same period.

Accessibility of data sources

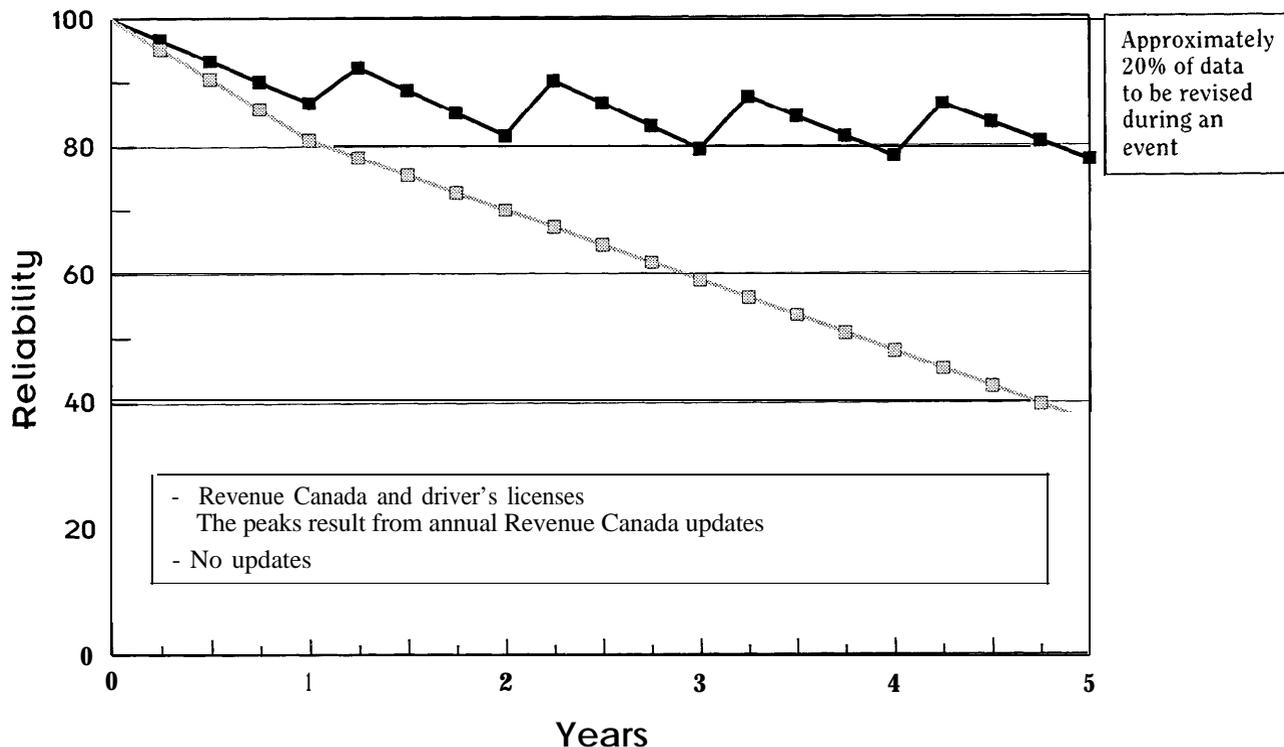
The feasibility and cost-effectiveness of the register is conditional on obtaining data on mobility annually from Revenue Canada as soon as possible after tax returns are filed, and on obtaining data from provincial and territorial driver's licence files at regular intervals.

The team had preliminary discussions with Statistics Canada on the possibility of using their agency to obtain information on deaths from provincial and territorial vital-statistics registrars. Elections Canada has also approached Statistics Canada to explore whether it would be possible to obtain name and address information collected during the census to improve register reliability. Discussions between Elections Canada and Statistics Canada will continue to explore the potential for co-operative work, which could result in savings for both agencies.

Privacy and security

Safeguarding register information would be essential, both to ensure that no unauthorized access to or use of the register would be possible, and to protect valuable assets. Statutory provisions restricting the use of

forecast reliability



electoral information to electoral purposes would remain. Agreements to share data with other electoral agencies would be dependent on comparable statutory safeguards.

Maintaining the register between events would require physical and electronic measures to protect the confidentiality of register information, and to ensure that it would be used only for electoral purposes. The project team's cost estimates include security measures to protect data, software and equipment from unauthorized access, destruction or tampering. These could

include restricted premises to house the hardware for the register, and security features in the software to prevent unauthorized or accidental access to the data as well as tracing unauthorized use.

To maintain event-readiness, a contingency plan would be in place to provide backup in case the system was damaged or destroyed by fire, power failure or a similar occurrence. The plan would include a backup computer and off-premises storage of backup software and data to ensure that the register would be available for use on short notice.

6. Alliances and Partnerships

Consultations have indicated that there are potential partners ready to help build a register, either by supplying data from existing permanent lists or by conducting one last joint registration process. The majority of provincial and territorial authorities consulted have indicated that data could be made available to maintain a register through administrative agreements rather than changes to legislation. There are clear indications that momentum for sharing information in a common register is increasing, and that interest is high.

Alliances or partnerships with other electoral jurisdictions would offer several potential benefits:

- opportunities to share the effort and cost of shifting from an enumeration-based to a register-based system of voter registration
- maintaining the register at the desired reliability target by using administrative sources to update information, including revised electoral lists generated from the various jurisdictions, and
- a real opportunity for increasing cost avoidance through sharing information and more frequent use by multiple jurisdictions.

Sharing processes and information would also allow for a more transparent and simplified process, helping to eliminate voter confusion and frustration with the current duplication.

Consultations

An important part of the project's research involved consultation with provincial and territorial Chief Electoral Officers and their staff on issues ranging from the very gen-

eral - the principle of moving from enumeration to a register - to the very specific: the details of provincial and territorial elector registration requirements, data collection and list production methods. Team members and Elections Canada executives also met a number of senior government officials to discuss broader issues, including the extent of legislative change needed to enable provinces and territories to participate in the building of the register and to supply data for its maintenance, and the timing for such change to occur.

The consultations included discussions with a variety of provincial and territorial officials:

- to determine the level of interest in establishing partnerships to build and share information generated by the register and related automated systems
- to assess the compatibility of electoral law among jurisdictions as it relates to voter qualifications and electoral list content
- to explore timing issues and the existence of actual or anticipated windows of opportunity, and the need for and nature of any follow-up action required, and
- to assess the reliability of provincial and territorial data sources for register maintenance and to determine their accessibility.

The project team conducted an extensive review of provincial and territorial privacy and/or access to information legislation, electoral legislation, and other legislation covering the various data sources.

Level of interest

Many provincial and territorial officials acknowledge that enumeration is increasingly problematic. The difficulties encountered at the federal level are no less common at the provincial and territorial levels, particularly in large urban centres.

Similarly they recognize that a register could contribute to the resolution of many of these problems. Pressures to reduce public expenditures and introduce streamlined processes are felt equally at the provincial, territorial and federal levels. Interest has also been expressed by provincial and territorial electoral officials in providing an automated list of electors to political parties and candidates.

Opportunities for partnerships

Co-operation in building a register

The Chief Electoral Officer of British Columbia has already stated that it would provide the database which flows from the 1996 provincial election, which would allow Elections Canada to build a register for that province. The Chief Electoral Officer of Newfoundland and Ontario's Ministry of Finance (responsible for municipal elections) are interested in entering partnership relationships with Elections Canada to conduct a joint elector registration drive outside an event in the spring of 1997.

Co-operation in maintaining the register

The project team held extensive consultations through formal meetings with several organizations, including the Canadian Council of Motor Transport Administrators (motor-vehicle registrars), the Vital Statistics Council for Canada (vital-statistics registrars) and the Canadian Directors of Property Assessment. Subsequent surveys were conducted involving more than 75 provincial and territorial officials who were being considered as potential data suppliers for maintaining a register. The surveys provided information on database content and its accessibility.

At the provincial and territorial levels, the laws and regulations governing driver's licences and vital statistics would require

changes in only three jurisdictions in order to permit sharing of information: the Northwest Territories (legislative) and Nova Scotia and Manitoba (both regulatory). In the other jurisdictions, access to data to update the register could be obtained through administrative agreements that could be concluded shortly after the passage of federal enabling legislation.

Sharing electoral lists versus sharing a register

It is important to make a distinction between the two basic possibilities which exist for sharing electoral registration information: jurisdictions may agree to share the lists which flow from their own enumerations or voter registration processes, or they may agree to share the information contained in a federal register.

Sharing electoral lists among jurisdictions

Most provinces and territories have indicated a willingness to supply their final voters lists after each election to assist in updating the register. Using provincial and territorial lists to refresh the federal list and vice versa could be an important part of maintaining a register.

Three provinces already have legislative authority to share lists with Elections Canada: British Columbia, Manitoba and Quebec. Nova Scotia, New Brunswick, Yukon and the Northwest Territories interpret their laws as allowing them to provide data to Elections Canada. The Chief Electoral Officers of Alberta, Saskatchewan, Prince Edward Island, Newfoundland and Ontario, as well as officials from the Ontario Ministry of Finance (responsible for conducting municipal enumerations in that province), are open to the possibility of sharing information, although their current statutes prevent the sharing of elector information.

Co-operation in sharing data

British Columbia, Quebec, Newfoundland and New Brunswick have demonstrated their willingness to share a register with Elections Canada.

The provinces of Quebec and Newfoundland have enacted legislation that would permit the sharing of data with the Chief Electoral Officer of Canada. However, the legislation from neither province is not yet in effect. The New Brunswick government has publicly stated its intention to move toward a permanent list and its interest in working with Elections Canada. Newfoundland has expressed a desire to take full advantage of Elections Canada registration systems to maintain its permanent list.

Alberta is looking at the merits of moving toward a common register after its next general election. The province of Manitoba is also considering establishing a permanent list. Elections Canada sits on both the Steering Committee and the Working Group for Manitoba's Permanent Voters List Study being conducted by the province's Department of Urban Affairs.

Other opportunities

The project team's consultations identified other areas of collaboration that might be seen as interim steps toward a common register, particularly in the areas of geographic information systems, digitized mapping, and Elections Canada's Automated Production of Lists of Electors system (ECAPLE). Elections Canada has already invested in automation for six years, and a number of provinces and territories have either taken advantage of or have been exploring the possibility of sharing Elections Canada's expertise and systems. Alberta and New Brunswick have expressed an interest in establishing common polling divisions, which would constitute a further step toward electoral compatibility; Prince Edward Island and Elections Canada have already done so. Provincial Chief Electoral Officers in Alberta, Nova Scotia and Prince Edward Island have expressed a desire in the short term to use an adapted version of Election Canada's ECAPLE system to automate their electoral list in their next enumeration.

7. Proposed Implementation Plan

At the end of the project implementation phase, Elections Canada would have in place:

- a computerized repository for data on electors at Elections Canada headquarters, linked to national cartographic information indicating electoral boundaries; the repository would contain the residential and mailing addresses, names and personal identifying information of qualified electors, all at pre-established and measurable standards of quality
- a fully tested computer software application and procedures for using register data to produce voters lists at all federal returning offices, and a new field application methodology for revising and producing lists during electoral events
- a functioning management infrastructure for the register
- a proven headquarters system and database for maintaining the register and updating it by using multiple sources of administrative and electoral data
- agreements with non-electoral data suppliers to provide name, address and statistical data regularly, for the upkeep and quality measurement of the register's contents
- modifications to federal and (where applicable) provincial and territorial legislation, changing voter registration procedures to

make effective use of a shared register of electors, and

- agreements with participating provincial and territorial electoral agencies to share the register's contents, and to use voters list revisions obtained during provincial and territorial electoral events as an important update source.

The effects of introducing a register - particularly the 36-day calendar and the new revision process - would ripple throughout Elections Canada's organizational units, influencing staffing patterns, training needs, documentation requirements, communications strategies and many other aspects of the way the agency does business.

Timetable

The implementation plan assumes that crucial legislative amendments could be in place by the end of June 1996.

The reason is simple. To take advantage of a number of favourable circumstances and to maximize the potential for cost avoidance, the register should be in place for the next electoral event. Timely passage of legislation would also allow the Chief Electoral Officer to enter into formal partnership arrangements and award contracts for building the register and developing the maintenance system.

The following table indicates the major tasks and the period during which they would be undertaken.

Implementation schedule

Task	Completed by
New and amended legislation to implement the register	June 1996
Register design	June 1996
Agreements with partners and data suppliers	December 1996
Systems development	
• build system	December 1996
• maintain system	June 1997
• use system	December 1996
Public communications program	April 1997
Registration process to build the register	June 1997
Register ready for use	August 1997

Being ready to use the register for a fall 1997 election would mean that Elections Canada must begin to design the register immediately and start the activities needed to establish the register's infrastructure in the summer of 1996.

The next steps

Legislative changes

The proposed register would require three major types of changes to the ***Canada Elections Act***:

- new legislative provisions needed to build the register: amendments to eliminate door-to-door enumeration within the event calendar, and to give the Chief Electoral Officer authority to establish and maintain the register, including use of existing provincial registers and a joint elector registration with the provinces
- new legislative provisions to maintain the register: amendments to permit continuing maintenance of the register between electoral events, and
- amendments to provide for a minimum 36-day election calendar and for new revision procedures.

Changes to the federal ***Income Tax Act*** are required to give authority for co-operative

arrangements and for providing required data to Elections Canada.

At the provincial and territorial levels, the laws and regulations governing motor-vehicle, driver-registration and vital statistics would require change in only three jurisdictions: the Northwest Territories, Nova Scotia and Manitoba. In the other jurisdictions, data to update the register could be obtained through administrative agreements.

Changes would be required to Alberta, Ontario and New Brunswick statutes, to permit sharing of electoral lists and collecting additional data needed by the federal level.

Designing the register

This critical part of implementation would require a minimum of four months to develop the design and see it through the various review processes. During this period all components of the register would be conceptually defined and documented, including quality-assurance measures and the mechanisms needed to monitor and report on project progress and expenditures.

Building the register

During the summer and fall of 1996, the infrastructure would be put in place to build the register: the software and hardware, the systems and procedures for headquarters and returning offices, an agreement with Canada Post Corporation on handling the elector registration and processing data, and the partnership arrangements with provinces for using their register data or for joint elector registration initiatives.

Through the implementation period, the building process would consist of assembling data from existing registers, updating it where necessary, conducting joint elector registration (in spring 1997) with provinces where administrative arrangements have been concluded, and conducting the elector registration by mail in the other provinces and territories.

By 1997 a comprehensive communications strategy would be ready, to ensure that electors would be aware of the purpose of the elector registration process and to encourage them to participate. An Elections Canada householder flyer would address the matter of the privacy and confidentiality of information provided by electors.

Maintaining the register

Developing the systems and procedures for maintaining the register would take place from summer 1996 to June 1997. Shortly after the passage of federal legislation, administrative arrangements would need to be concluded with provincial and territorial registrars of motor vehicles, registrars of vital statistics, Citizenship and Immigration Canada and Revenue Canada. Register maintenance would have to be ready to begin once the register hardware and software were in place and shortly after the initial data were collected.

Experience with partnerships in building the register would guide subsequent decisions about the management model best suited to maintaining the register into the future.

Using the register

Where preliminary voters lists were once produced in the field through enumeration, the source of the preliminary list would now be the centrally maintained register. The existing systems in the returning offices would be revised to accommodate a greater volume of revisions in the field.

8. Conclusions and Recommendations

The project team reached the following conclusions for each of the project's major components:

- **business case:** the level of cost avoidance available in moving to a register would be sufficient to recoup the investment in register development at the first electoral event after a register is established, providing that Elections Canada has partners in building the register, that a new revision system is implemented, and that a reduced elections calendar is in effect. Each subsequent event would save approximately \$40 million in voter registration costs.

- **new business process:** a register of electors should be built outside an electoral event through an elector registration process conducted by mail in the spring of 1997 in collaboration with Canada Post Corporation; the process would take place in provinces and territories where registers do not exist and where no agreements have been made for a joint registration process. The process for revising the voters lists generated from this register should be simplified to make the process more voter-friendly and to reduce costs. With the elimination of enumeration, the electoral calendar could be shortened to a minimum of 36 days.

- **data to maintain the register:** updating a register of electors using existing administrative data sources is feasible, provided that identifying data are collected to facilitate matching between databases. The best data source for updating would be a combination of Revenue Canada files, provincial and territorial driver's licence and vital-statistics files, and Citizenship and Immigration Canada files. Such a register would meet the 80% reliability standard set for the project, based on the successful experience of the 1993 election.

- **alliances and partnerships:** Elections Canada has partners for building the register. Six jurisdictions either have moved to or are looking at the merits of a register system. The remaining jurisdictions are waiting to evaluate Elections Canada's experience with a register.

The project team also concluded that a register would satisfy each of the six principles described in section 1, and on which the project was founded.

Recommendations

The project team recommends to the Chief Electoral Officer that he present to the House of Commons Standing Committee on Procedure and House Affairs a proposal for new provisions and amendments to the existing **Canada Elections Act** and amendments to the **Income Tax Act**, to build, maintain and use a register, in particular:

1. new provisions to the **Canada Elections Act** to:
 - build and maintain a register, and
 - authorize the Chief Electoral Officer to enter into agreements to build the register
2. amendments to the **Canada Elections Act** to:
 - eliminate door-to-door enumeration
 - set the minimum electoral calendar at 36 days, and
 - allow for a new revision process of preliminary voters lists
3. amendments to the **Income Tax Act** to permit the use of administrative data in maintaining and updating the register

The team further recommends that the new legislation and the amendments be in place by the end of June 1996 and in force at the latest one year later to ensure timely and economical implementation of the register.