

Evaluation of the Electoral Boundaries Readjustment Administration



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Executive Summary

Elections Canada's (EC) programs are evaluated according to a five-year performance and evaluation plan that ensures the agency meets its strategic commitments and policy requirements and is appropriately investing in sound management.

What We Examined

Two questions were asked to frame the evaluation of the Electoral Boundaries Readjustment Administration (EBRA) program:

- Has the EBRA program effectively and efficiently designed, implemented, and delivered support services to provincial commissions?
- Are there unmitigated risks to the future of the EBRA program?

Why the Evaluation Is Important

The *Electoral Boundaries Readjustment Act* (R.S.C., 1985, c. E-3) (the Act) is designed to ensure fair and effective representation in the House of Commons. The Act and the *Constitution Act, 1867* stipulate that the number of House of Commons seats and the boundaries of electoral districts must be reviewed starting the year after each decennial census year. The review is done to reflect the changes and movements in Canada's population. It also plays a crucial role in ensuring fair and equitable representation in the legislative process in light of these changes.

Since the review is done only every 10 years, it is crucial to evaluate the process and capture recommendations that can be leveraged by the next EBRA team so that best practices and lessons learned can be applied to future readjustments.

What We Found

The purpose of this evaluation is to assess how effectively and efficiently the EBRA program delivered its services in support of the independent provincial commissions in their review of the federal electoral boundaries. It also included making recommendations that can be considered when preparing for the next readjustment exercise.

Findings:

- **Finding 1:** The time required to plan for and develop the requisite services to support the 10 electoral commissions exceeds the 3-year duration of the EBRA program.

- **Finding 2:** Perceptions of the importance of electoral redistribution at EC may be misaligned with the actual status of the exercise as one of the agency's core mandates. This misalignment has led to EC's functional lines inadequately prioritizing and supporting the program.
- **Finding 3:** Requirements for public-facing tools were not well defined and lacked flexibility, which resulted in tools that were ineffective when it came to public participation or misaligned with the expectations of commissioners.
- **Finding 4:** While commissioners were satisfied with the support services of the EBRA program, the lowest survey scores were in areas where the core team relied on internal corporate support, notably, in information technology and communication services.
- **Finding 5:** EC provides substantial additional support that goes beyond the requirements of the Act and without which the EBRA program could not be executed as required by the legislation.
- **Finding 6:** The transfer of custodianship of the National Geographic Database (NGD) to Statistics Canada could disrupt communication between Statistics Canada and EC in the years leading up to the next readjustment exercise.

Recommendations

The findings and evidence from the report inform the following recommendations:

- **Recommendation 1:** Enhance the EBRA program timeline, team composition and performance measurement through the development of a documented plan and approach to the conduct of the EBRA activities.
- **Recommendation 2:** Enhance planning and resource allocation for improving public participation.
- **Recommendation 3:** Increase internal awareness and prioritization of the EBRA program.
- **Recommendation 4:** Mitigate risks associated with the replacement of the NGD with another road network database.

1. Introduction

1.1 Context

The *Electoral Boundaries Readjustment Act* (R.S.C., 1985, c. E-3) (the “Act”) is designed to ensure fair and effective representation in the House of Commons. The Act and the *Constitution Act, 1867* stipulate that the number of House of Commons seats and the boundaries of electoral districts must be reviewed starting the year after each decennial census year. The review is done to reflect the changes and movements in Canada’s population. It also plays a crucial role in ensuring fair and equitable representation in the legislative process in light of these changes.

Since the review is done only every 10 years, it is crucial to evaluate the process and capture recommendations that can be leveraged by the next EBRA team so that best practices and lessons learned will be applied to future readjustments.

Redistribution involves recalculating the allocation of electoral districts (and, thus, seats in the House of Commons) for each province based on new population estimates. This calculation follows the Representation Formula outlined in subsection 51(1) of the *Constitution Act* and subsequent amendments. The boundaries of each district are redrawn not only to reflect a change in the number of districts that are allocated to each province but also to mirror demographic changes within the provinces.

This process of redrawing electoral district boundaries is managed by 10 independent electoral boundaries readjustment commissions—one for each province.¹ The Governor in Council, by proclamation published in the *Canada Gazette*, establishes these commissions. Each commission is chaired by a judge appointed by the Chief Justice of the province and includes two members that are appointed by the Speaker of the House of Commons. These commissions operate at arm’s length and independently of the Office of the Chief Electoral Officer.

Commissions must deliver two or three reports over a 10-month time span. The first report is a proposal for the electoral boundaries of a province. This proposal is published to inform the public of the boundaries proposed by a commission and to invite them to express their views at public hearings. Following public consultations, a commission revises its proposal and prepares its report, which is tabled in the House of Commons for consideration by members of Parliament. In some cases, a report of objections results from this review and is returned to the commission, which must dispose of it and prepare a final third report if necessary.

¹ A federal electoral district, also known as a “riding” or “constituency,” is a geographical area that is represented by a member of Parliament (MP) in the House of Commons. During elections, electors vote for an MP to represent their district.

Each report includes the name, population, geographic boundaries and textual description of each riding, as well as the commission's rationale for its decisions. At the end of the redistribution exercise, the Chief Electoral Officer takes the final reports from all 10 commissions to prepare the new representation order and the new electoral map.

Under the Act, EC has several legal obligations to support the independent commissions responsible for redrawing electoral boundaries. These obligations include providing each commission with certified census results and demographic maps of their respective provinces, calculating and publishing in the *Canada Gazette* the number of House of Commons seats per province and extending a commission's deadline if necessary.

EC must also receive and transmit certified copies of commission reports to the Speaker of the House of Commons, prepare and distribute both printed and electronic versions of maps for each electoral district and province and submit a draft representation order to the minister. Additionally, EC is required to publish the representation order and proclamation in the *Canada Gazette* and provide various support services to the commissions in various areas, including human resources, financial management, information management, information technology, communications, real property, equipment and procurement. Finally, EC must provide the resources required by commissions to fulfill these mandates. These legal obligations in turn engender the need for other services and support activities without which commissioners would not be able to fulfill their mandate.

As the pace of technological change accelerates, Canadians' expectations are evolving. In the past, the support provided primarily involved administrative assistance for a series of in-person hearings that were advertised in printed newspapers. Today, there is an expectation for online participation, electronic submissions, virtual communication and interactivity.

That said, electoral redistribution must remain at arm's length of EC. Consequently, the EBRA program cannot establish a standard one-size-fits-all approach to supporting activities. Instead, it must plan to accommodate the divergent wants and requirements of each commission and each province. Public expectations for transparency and an up-to-date approach to communication, along with the independence of commissioners, create additional layers of complexity that the program has not faced in the past.

1.2 Objective

EC's programs are evaluated according to a five-year performance and evaluation plan that ensures the agency meets its strategic commitments and policy requirements and is appropriately investing in sound management.

The purpose of this evaluation is to assess how effectively and efficiently the EBRA program delivered its services in support of the independent provincial commissions

during their review of the federal electoral boundaries; and make recommendations for the next redistribution exercise.

Two questions were asked to frame the evaluation of the EBRA program:

- Has the EBRA program effectively and efficiently designed, implemented and delivered support services to provincial commissions?
- Are there unmitigated risks to the future of the EBRA program?

1.3 Scope

This report examines the performance of the ERBA program, which was launched over the review period that began on September 29, 2020, with the appointment of the electoral redistribution senior director, and ended on April 23, 2024, when the representation orders officially came into effect.

Exclusions

The review did not assess the work of the provincial commissioners—for example, in terms of the accuracy of their proposals, how their hearings were led or the kind of feedback they provided to the public.

The review also did not verify the accuracy of calculations submitted to Parliament.

1.4 Methodology

EC's evaluations normally follow a process that has four phases: planning, research, reporting and use. However, concerns around timing and access to commissioners and their staff prompted the program team to engage in the research phase immediately upon completion of the redistribution activities while commissioners and staff were still being remunerated and project activities were still fresh in their minds.

Planning phase: The planning phase used discussions with program managers and a document review to confirm the scope, validity, adequacy and usefulness of the data that was previously gathered by the program.²

Research phase: Data-gathering instruments for the research phase included: surveys, interviews, a document review, and a review of a lessons learned exercise completed by the program team independently.

² Concerns around timing and access to commissioners and their staff prompted the program team to conduct a comprehensive survey immediately upon completion of the redistribution exercise while commissioners and staff were still being remunerated and project activities were still fresh in their minds.

- **Survey of commissioners and commission staff:** An online survey was sent to commissioners, commission secretaries and commission chairs, i.e. a total of 40 individuals, and obtained a 62% participation rate. The survey included open-ended and closed-ended questions, collecting valuable information and direct feedback. The questions focused on 9 key areas: management of commission offices, geographic tools and services, geography specialists, communications and parliamentary affairs, public hearings, preparation of documents, financial services, technology and administrative support.
- **Interviews with internal stakeholders:** Interviews were conducted with 20 EC staff, including the program team members and employees from across the agency involved in various support roles, to provide information on the context, program policies and approaches, as well as recommendations on obtaining other data sources.
- **Document review:** A review by the program team of over 200 key documents—related to procurement, planning, communication, public feedback, project plans, project schedules, financial information, meeting notes and correspondence—was conducted to develop a holistic understanding of the entire redistribution process and to validate the results of the surveys and interviews.
- **Additional information:** The project team conducted its own self-assessment and lessons learned exercise, which were considered by the evaluator in the research phase.

Reporting phase: A participatory approach was used to write the final report, with input from the program team and senior management.

Use phase: Recommendations from the evaluation will be used to inform the next redistribution exercise in 2032.

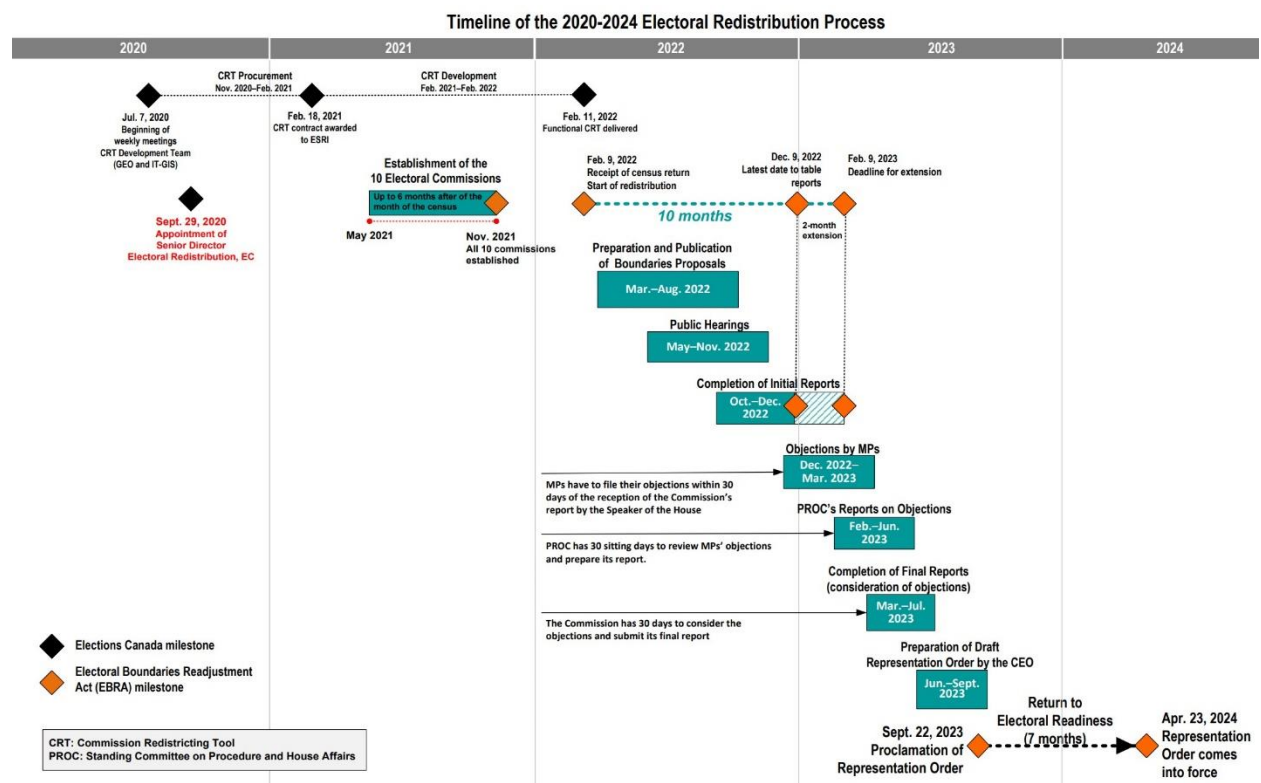
2. Findings

Finding 1. The time required to plan for and develop the requisite services to support the 10 electoral commissions exceeds the 3-year duration of the EBRA program.

Planning for the program

While the Act defines the requirements, the scale and scope of the work involved in supporting the 10 independent commissions are far greater than those implied by these requirements. Therefore, EC's development of tools and services, which are part of the critical path, must begin well in advance of the official launch of the redistribution exercise.

Figure 1. Official timeline of the redistribution process



Before the establishment of the commissions, a great deal of preparation needs to be completed. Staffing, financial planning, real property planning, communication planning, infrastructure technology procurement and geomatics activities all need to take place before commissioners are selected to allow them to be operational as quickly as possible once the commission is formed.

The role of each commission is to revise the electoral boundaries of their province. To do so, they first assess the demographic changes that have occurred then propose new boundaries that reflect these changes. These demographic changes are provided by EC to the commissions in the form of census data and population maps approximately four months after their official release. EC cannot accelerate this timeline, as the release of certified census information is entirely in the hands of Statistics Canada.

One of the most critical and complicated functions of the electoral redistribution management team is the geomatics preparatory work that involves a collaboration between Statistics Canada and Natural Resources Canada (NRCAN). The work completed by EC and the collaboration with two other government agencies is outlined below.

Elections Canada

- Developing the Commission Redistricting Tool (CRT), which included a procurement process to select a company that would develop the geomatics tool (this work lasted approximately one year).
- Downloading the complete datasets to be used by the commissions, which include the 2021 census population data and the 2016 census demographic variables data.
- Identifying requisite internal stakeholders and developing working relationships to deliver appropriate planning and activities.

Natural Resources Canada

Establishing a memorandum of understanding that includes the following responsibilities:

- Reviewing and preparing the legal boundary descriptions after the submission of the commissions' proposals and presentation of the commissions' preliminary report and, if necessary, for their final report.
- Reviewing the names of electoral districts proposed by the commissions throughout the redistribution process via the Geographical Names Board of Canada.

Statistics Canada

Establishing a memorandum of understanding to ensure that the proper census data is used when building the CRT. This includes the following responsibilities:

- Preparing census demographic data (2016 data transposed onto 2021)
- Validating population following census splits
- Validating electoral district populations after the proposal stage and report stage completed by the electoral commissions

This work and other functional and administrative activity, such as preparing digital tools for the commissions, are not directly legislated for; however, without this work and activity, the commissioners' work would not have been possible. Many tasks must be done well in advance of the creation of the commissions. In future iterations of the EBRA program, new staff will likely be working on the EBRA program tasks.

The evaluation found that the process to define, procure and develop the required geomatics started at EC in July of 2020, almost a year and a half prior to the official launch of the EBRA program.

Unplanned commission requests

Even with the best planning, commissions encounter needs along the way, which places an additional burden on the support provided by EC. For example, some commissioners in the 2022 EBRA cycle decided to publish online all public comments they received by email, on social media and during hearings along with the commissions' replies to them. EBRA staff had not accounted for this nor for the fact that the extensive feedback received resulted in an additional 2,500 web pages, which each needed to be set, coded and published. It is not sufficient or reasonable for EC to establish a standard procedure because commissioners are independent, and they expect to make decisions about how they engage with the public and how they go about organizing their work. Consequently, EC either needs to build in significant flexibility in its proposals and suggestions to accommodate the diverging working cultures of each of the 10 commissions; or discuss with the commissions the tasks they can and cannot complete.

Disruptions caused by the COVID-19 pandemic

EC supports the commissions in their public and social engagement activities. In previous EBRA cycles, such as that of 2012, EC relied on in-person hearings and conducted some online activities. However, the planning remained focused on traditional methods of outreach. The rapid onset of COVID-19 pandemic measures and supply chain delays created a series of challenges for the EBRA team in both the planning and development of services. In interviews, supply-chain delays for the technology required by the commissions and the increase in the public's expectations to participate virtually in online or hybrid events were highlighted. The team had to quickly change their planned approach and provide support for commissioners who requested the means to conduct virtual hearings and solicit feedback online, that is using a desktop or mobile device.

In fact, EBRA commissions conducted 15 virtual hearings out of the 146 total hearings. Attendance results for virtual hearings were higher than those for in-person hearings. Results from the survey of commissioners and their teams found that commissioners were generally satisfied with EC's efforts to enable virtual events but were somewhat dissatisfied with the registration and sign-in process for virtual events and with the level of technical support and moderation services provided.

Finding 2. Perceptions of the importance of electoral redistribution at EC may be misaligned with its actual status as one of the agency’s core mandates. This misalignment has led to EC’s functional lines inadequately prioritizing and supporting the program.

At the start of the program, EC established a working group called the Electoral Boundaries Redistribution Working Group (EBRWG). This group was chaired by the assistant director, Operations, Electoral Redistribution, with the senior geomatics Manager, Geography and Address Management, acting as the deputy chair. While the Electoral Redistribution Directorate was accountable for the delivery of the overall project, the EBRWG was expected to provide the necessary support. Composed of over 20 managers across all relevant functions and divisions (e.g. finance, human resources, information technology and legal services) required to advance EBRA, the EBRA team scheduled regular meetings of the EBRWG throughout the program’s lifecycle.

However, a review of records of decision suggests that, outside the EBRA core team members, functional groups within EC rarely, if ever, participated in the regular meetings organized by EBRA. This lack of participation was seen throughout critical EBRA pre-planning stages as well as during periods when commissions were completing their work.

Interviews held with core EBRA team members indicate that they felt their requests were often de-prioritized during work-intensive by-election periods. Interviews with people in other sectors at EC, NRCAN and/or Statistics Canada that work with EBRA showcase the de-prioritization of the program, with most interviewees stating that they did not know the EBRA program was a core mandate of EC and that their departments mostly forget about it until reminded of it in the lead-up to the launch.

While the 2023 EBRA cycle achieved its objectives, this success can be attributed to the diligence and experience of a core EBRA team that was highly knowledgeable about the program. In the next iteration of EBRA in 2031, one of the biggest challenges that EC will face will be due to the retirement of key resources—that is individuals who have accumulated experience in multiple redistribution processes and are a source of invaluable corporate knowledge. These people (senior managers for the most part) have a wealth of information that goes beyond the content of manuals and training documents.

Finding 3. Requirements for public-facing tools were not well defined and lacked flexibility, which resulted in tools that were ineffective when it came to public participation or misaligned with the expectations of commissioners.

The objective of public-facing tools was to enable the public to submit boundary proposals and access existing boundary maps virtually. However, there were some

challenges with these tools. An interactive mapping application that allowed people to submit their version of an electoral district map—called the Redistricting Interactive Mapping (RIM) tool—did not include the latest population data, which constitute the primary criterion for redistribution. This data could not be included due to confidentiality rules. Consequently, the general public would submit redistribution maps without knowing the corresponding population figures. This situation may have limited the relevance of public submissions and their usefulness for the commissioners.

A review of survey results and interviews with the EBRA management team confirmed that most commissioners expressed their dissatisfaction with the RIM tool because of its limited functionality. Interviews clarified that a lack of time shortened the planning phase and time available for consultations on user expectations and requirements. During the document review, it could not be determined what the user needs were nor what consultations had been done to develop public-facing tools. Reviewing public comments received by EC on the website, it became evident that the public was discouraged by the lack of accurate population data. Comments during interviews suggested that the rapid pace of the program and the lack of sufficient time and resources to examine all the elements may lead to these kinds of gaps and issues.

Document reviews and interviews confirmed that EC went to great lengths to plan for virtual interactions and events. However, not all the nuances and details were accounted for in advance or could have been foreseen. As commissions are independent, they can carry out their duties as they see fit. One commissioner may want EC moderation services and technical support, another may not want moderation services. No legislative framework covers these expectations. During the evaluation, an interviewee stated that EBRA staff had to “read the commissioners’ minds before meeting them” to determine what unique supports they may need.

Finding 4. While commissioners were satisfied with the support services of the EBRA program, the lowest survey scores were in areas where the core team relied on internal corporate support, notably, information technology services and communication services.

Overall, surveys conducted for this evaluation indicated that commissioners and their teams expressed satisfaction with the work of field geomatics specialists. They were also very satisfied with EBRA management and administrative support and were highly appreciative of the support provided for in-person public hearings. However, commissioners were not satisfied with the support provided during the conduct of virtual hearings. The results for EC’s public communication were also mixed, with 50% of commissioners expressing satisfaction and 50% who did not. The communication plan followed the standards of the federal public service and was too broad at the national level, making it not well adapted to the various provincial and commission-specific realities. Rural areas in particular were affected by the communication plan’s greater use of digital tools and social media over traditional newspaper, radio and television tools, which the commissioners advocated for. Document reviews and internal

interviews suggest that there was no dedicated resource for supporting online hearings as they took place. The EBRA core team did not have dedicated technical support personnel.

Despite EC spending over \$2 million to generate awareness of hearings across multiple mediums, the general perception remained that EC did not do enough to generate the level of public interest required to support the hearings—the dates of which are set by the commissioners themselves.

Finding 5. EC provides substantial additional support that goes beyond the requirements of the Act and without which the EBRA program could not be executed as required by the legislation.

During interviews, the EBRA team expressed struggling to comply with certain sections of the Act. For example, the Act requires redistricting proposals to be published in the *Canada Gazette* and in at least one newspaper of general circulation in the province at a time where most Canadians rely on online sources for their news. This requires that EC dedicate resources to the formatting, development and printing of newspaper inserts. Sourcing paper printers in both English and French across 10 provinces proved to be an extremely difficult challenge. One interviewee even noted that the only French newspaper printer in one province had closed since the 2021 EBRA cycle, and that they did not know how they would tackle this challenge for the 2031 EBRA cycle.

Some of the services offered by EC may not be required for the next cycle. For instance, during interviews and the review of the survey results, it was found that most commissioners rarely used their office space or the provisioned equipment and furniture. The real property line of service cost the EBRA program approximately \$750,000, which may have been better used to provision other services. One of the commissions refused to take office space altogether and instead opted for workshare arrangements. EC may benefit from a comprehensive review of service provisioning and performance measurement to identify where investments may be necessary and where they could be reduced. The program has developed recommendations to update the Act, which may alleviate some of these issues.

Finding 6. The transfer of custodianship of the NGD to Statistics Canada could disrupt communication between Statistics Canada and EC in the years leading up to the next readjustment exercise.

During interviews, concerns were raised about the future of the program, given the transition of the NGD from a joint custody database to a Statistics Canada owned and operated database.³ The NGD is a shared database between Statistics Canada and EC. The database contains road coordinates, road names and address ranges. It also

³ [Source: National Geographics Database](#)

includes separate reference layers containing physical and cultural features, such as hydrography and hydrographic names, railroads, and power transmission lines. Once the results of a new census are available, the census data is layered over the NGD, and this allows the commissioners to model boundary changes based on certified population data. The joint custody of the NGD is governed by a committee and associated memorandum of understanding that is renewed prior to each 10-year program cycle of the EBRA.

Changes currently under way will result in the elimination of the memorandum of understanding between Statistics Canada and EC. While this will yield some benefits for EC—such as reducing duplication of work and outsourcing of quality requirements to Statistics Canada—it also eliminates the need for regular interaction between the two organizations. Disruptions in the communication and coordination of this important asset may have a negative overall effect in the next EBRA cycle. During the 2021–2024 EBRA program, the EC geomatics teams and Statistics Canada had an established protocol, the roles and responsibilities were clear for both teams and significant efforts were required to ensure a common interpretation of the data.

3. Recommendations

Recommendation 1: Enhance the EBRA program timeline, team composition and performance measurement through the development of a documented plan and approach to the conduct of the program.

The time required to plan and develop the services needed to support the commissions exceeds the 12 months allotted for the planning phase in the three-year EBRA program. It is recommended to replace the current experiential approach with a documented approach to ensure a more structured and efficient process. It is recommended that the EBRA program:

- Begin preparatory work at least two fiscal years in advance of the establishment of the commissions to ensure all critical activities, particularly those involving geomatics, internal and external communication and public-facing information technology, are conducted in a timely manner to guarantee program success.
- Conduct a comprehensive review of service provisioning to identify services that may no longer be required, such as those related to underused office space and equipment.
- Develop and document standardized processes, including roles and responsibilities, resource requirements, policy expectations and dependencies, for all EBRA program components. Include associated training needs, communication requirements and relevant areas of expertise. These elements should be integrated into a broader project plan to ensure alignment and coherence across the program.
- Implement a framework to amalgamate the various components, clarify interdependencies and demonstrate how each element contributes to the broader program objectives. This framework should lead to better coordination, communication, and resource management.
- Introduce robust governance mechanisms, including a steering committee. Establish clear performance indicators that encompass critical activities, such as communication activities, number of hearings, attendance rates and other key success factors. This will enable a more accurate assessment of the program's performance and identify areas for improvement.
- Leverage technology and data analytics to enhance decision making and program management. This includes using advanced data analysis tools to monitor program progress, identify trends and inform strategic decisions.

Recommendation 2: Enhance planning and resource allocation for improving public participation.

Enhance planning and resource allocation for improving public participation in the process, including modernized interactive channels (virtual hearings, online public engagement and tools). Ensure sufficient technical support, moderation services and user-friendly platforms to meet public expectations and adapt to changing circumstances, like those experienced during the COVID-19 pandemic.

Establish detailed user requirements for public-facing tools in consultation with former commissioners and external stakeholders. Ensure these tools are functional, user-friendly and include essential features, such as up-to-date population data, to enable the public to create realistic boundary scenarios.

Recommendation 3: Increase internal awareness and prioritization of the EBRA program

Improve internal awareness, communication, and engagement within EC to align perceptions of the EBRA program's importance with its status as a core mandate.

Reinstate a steering committee composed of senior management that will oversee the program's progress and performance.

Review the program's corporate governance to make sure that all EC functional units are adequately supporting and allocating resources throughout the program's lifecycle.

Recommendation 4: Mitigate risks associated with the replacement of the NGD with another road network database.

Develop strategies to address the potential risks arising from the transfer of the NGD to Statistics Canada. Ensure ongoing collaboration and communication between EC and Statistics Canada to preserve institutional knowledge and maintain the effectiveness of geospatial data management that is critical to the redistribution process.

4. Conclusion

The evaluation concludes that the EBRA program was conducted effectively. This effectiveness was attested to by commissioners, their staff, external stakeholders and geomatics field specialists. This was also confirmed through media visibility and interaction statistics from the EBRA website. The EBRA team moved quickly to accommodate commissioners' requests without impinging on their independence.

The efficiency of the program can be enhanced through a review of program resourcing. Risks to the future of the program have increased, given that most highly experienced individuals who participated in the program have departed, and the NGD interactions between Statistics Canada and EC may no longer be in place at the start of the next cycle.

Despite the gaps identified, in general, the commissioners and external stakeholders confirmed the effectiveness of the EBRA team, and evidence suggests that the requirements of the Act and expectations of the commissions were met.