

# WHAT PASSPORT CANADA HEARD FROM CANADIANS

PUBLIC CONSULTATIONS FINDINGS REPORT

October 25, 2010



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#### Introduction

It has been a decade since Passport Canada last revised its fee structure. Since then, the agency has seen unprecedented growth due to rising passport demand. Since 2001, Passport Canada's issuance processes and the passport book itself have undergone security improvements and updates. The organization's service delivery network has expanded from 29 offices in 2001 to a national network that comprises 34 Passport Canada offices and 197 Service Canada and Canada Post outlets that accept applications.

In order to continue improving the Canadian passport, the Government of Canada has decided to move to the next generation of travel documents by adopting the electronic passport, or ePassport. The specifications for the ePassport were adopted by the International Civil Aviation Organization (ICAO) in 2003. Over 80 countries now issue ePassports and an estimated 250 million such documents are in circulation worldwide. Implementing the ePassport will allow Canada to keep pace with international norms in the field of travel document security. This new passport will be more resistant to tampering and will make illicit travel, such as travelling under a false identity, much more difficult. The ePassport will help protect Canada's borders and maintain the ease of international travel that Canadians enjoy.

The passport application process will not change with the adoption of the ePassport. However, implementing this improved passport means that Passport Canada will have to make some changes to its services and associated fees. These changes will take effect when the ePassport is rolled out, starting in 2012.

Some of these changes have already been determined. For instance, Passport Canada will start offering Canadian adults the choice of a 10-year validity period as well as the current 5-year validity period. (Children will continue to receive passports with a maximum validity of 5 years.)

Before making these changes, Passport Canada consulted Canadians in accordance with the process set out by the *User Fees Act*. Under this law, federal departments wishing to modify their services and associated fees must consult clients first. The purpose of the *User Fees Act* is to ensure that Canadians' views are taken into account before any changes are made. It also enables parliamentarians to review the service and fee proposals when they are tabled in Parliament by the minister responsible for the file.

Passport Canada sought input from clients and stakeholders through three consultations vehicles:

- three round table sessions held in May 2010 with organizations representing a wide range of stakeholder interests;
- an online questionnaire on passport services, which was active from April 6 to May 7, 2010;
   and
- a letter campaign inviting non-government stakeholders to provide written submissions.

This report presents the main points raised by participants and stakeholders through the three vehicles mentioned above. It seeks to give a detailed and objective account of what was heard during

these public consultations. Each information source has a dedicated section in this report. Passport Canada has also included a few relevant facts, presented in sections entitled "Fact check". The organization will more formally respond to the ideas and concerns expressed through the consultations at a later date.

The findings of this consultative exercise are not necessarily representative of Passport Canada's clientele or of Canadians as a whole. Rather, the consultations provided an opportunity for interested parties to make their voices heard and give Passport Canada new ideas and a better sense of their expectations regarding passport services.

In accordance with the *User Fees Act*, Passport Canada is using the input from the consultations to design an updated service offering and fee structure to support the 10-year validity ePassport. The consultations will also provide the organization with a solid base of knowledge to aid in future developments and decisions.

A separate report presenting the results of 2009 public opinion research on the 10-year ePassport and related questions is available on Passport Canada's website at the following address: www.passportcanada.gc.ca/consultations.

#### Main findings from Passport Canada's public consultations

The five main findings presented below are from input collected through the stakeholder round tables, online questionnaire and letter campaign. While some discrepancies do exist within the results of these three consultation vehicles, Passport Canada was able to identify many common trends found throughout the consultations. The findings below may not include all the views that were shared, but those presented here were chosen based on their relevance to the *User Fees Act* process.

Finding 1: The introduction of the 5- and 10-year ePassport is strongly supported. This stems from the popularity of the 10-year validity option, as well as the importance assigned to the need to follow international practices and stay at the fore of passport security.

Generally speaking, Canadians are not aware of the Government of Canada's plan to introduce the ePassport, nor do they know what an ePassport is. However, when those who participated in the consultations learned about the ePassport, clients and stakeholders alike were in favour of its adoption, citing the need to follow international practices and stay at the fore of passport security.

Passport Canada's public consultations also revealed that the overall positive reaction to the ePassport was largely driven by the extended validity period. When informed that adult passport applicants would have the choice between a 5- or 10-year passport, some clients and stakeholders wondered why the 5-year option was still being offered at all.

## Finding 2: Some Canadians have questions and concerns about the privacy implications of the ePassport.

The results of the consultations clearly indicate that most Canadians are not aware of the type of technology used in ePassports or of the built-in privacy protection. Many felt that Passport Canada should examine the case for additional safeguards regarding the ePassport, such as protective shielding to prevent unauthorized parties from reading the data on the chip.

Some participants felt that Passport Canada needed to better explain the privacy implications of adopting the ePassport, the steps it is taking to protect passport holders' personal information, the ways other governments may be using the information they collect from travellers, and how the ePassport may or may not facilitate this collection of personal information.

For example, some participants expressed concern about the use of biometrics and their potential impact on the protection of personal information in the passport. They were worried that the use of an electronic chip could lead to monitoring or surveillance of Canadians by unauthorized parties, which would subsequently increase the potential for identity fraud and document counterfeiting.

#### Fact check

Canadians' personal information is protected by the *Privacy Act*. The information stored on the higher-security ePassport is no exception.

## Finding 3: Participants are generally satisfied with Passport Canada's service offering. However, a variety of suggestions for further improvements to Passport Canada's services were proposed.

Passport Canada's 2008 client satisfaction survey showed that 96 percent of clients were satisfied with the services they received overall. The large number of positive comments received in the online consultations questionnaire corroborates this high level of client satisfaction. During the round table sessions, stakeholders provided further confirmation, stating that Passport Canada's service standards are very good – perhaps even better than what Canadians need.

Suggestions for further service improvements included:

- greater online access;
- an expanded office network;
- longer office hours;
- improved turnaround, including faster service and guaranteed turnaround times;
- expanded criteria for renewals;
- expanded criteria for guarantors abroad (for instance, accepting non-Canadian citizens); and
- taking passport photos on-site.

## Finding 4: To keep the price of the passport as low as possible, participants said that Passport Canada should find other sources of funding and new ways to save money.

For the most part, participants assumed that the adoption of ePassport technology will cause the cost of producing passports to increase. However, many felt that the increased validity period would keep the passport affordable. Other suggestions to keep costs down included:

- charging for supplementary services that are currently provided for free; and
- using travel-related advertising to generate revenue.

It was also noted that controlled and reasonable periodic fee increases, based on a formula that would be applied at specific intervals, could replace the current practice of reviewing passport fees at longer intervals. The current practice of putting off fee increases for as long as possible means that they are much larger when they do take place.

While participants shared many suggestions to keep the price of the passport as low as possible, there was substantial support for maintaining reduced passport fees for children. Conversely, participants had little appetite for providing the same type of reductions for other groups, such as seniors or veterans.

#### Fact check

The adoption of the ePassport with extended validity will not result in cost savings for Passport Canada. The addition of the electronic chip, necessary upgrades to the organization's internal security processes and technological infrastructure, and maintaining client service are costly undertakings, particularly considering that passport fees have not increased in the last decade.

## Finding 5: Canadians living outside of Canada were particularly interested in the consultations. They were also more likely to suggest service improvements.

While Canadians living abroad make up approximately 3 percent of Passport Canada's clientele, fully 11 percent of questionnaire participants stated that they were Canadians living abroad. Canadians living outside of Canada were more likely to suggest service improvements, including:

- improved access to services;
- improvements to the simplified renewal process; and
- faster turnaround times.

#### What Passport Canada heard during the consultations

#### Round table sessions on passport services

As part of its consultative process under the *User Fees Act*, Passport Canada held three round table sessions with organizations that have a stake in the Canadian passport and its role in facilitating secure travel. The sessions were held on May 12, 13 and 17, 2010, in Ottawa, Ontario.

The first round table brought together representatives from the consumer sector; the second brought together representatives from the business, trade, technology and transportation industries (this session will be referred to as the industry round table); and the third was made up of representatives from the travel and tourism sector.



Jean-Pierre Lamarche, Director responsible for the ePassport, Christine Desloges, CEO of Passport Canada, Gary McDonald, Director General of the Legislation and International Relations Bureau, and Jody Thomas, Chief Operating Officer, participate in one of Passport Canada's round table sessions.

The purpose of the round tables was to directly engage stakeholders outside of government and seed an informed public dialogue about Passport Canada's business model, products and services. One of the goals of the round tables was to raise awareness about the electronic passport, or ePassport, and its benefits, as well as plans to extend the validity period to ten years. Another goal was to facilitate a constructive exchange of information, produce ideas and proposals for improving services that reflect the interests of key sectors, and identify any issues that may stem from the proposed changes.

The information in this section is not meant to be analytical in nature, but rather offers an integral account of the proceedings. Furthermore, it does not represent any formal position taken by the organizations that participated. The round tables were held under the Chatham House Rule, which means that no comments may be attributed to specific individuals. Moreover, the identity of the individuals who participated on behalf of the various organizations may not be revealed.

#### Organizations that participated in the round tables

- Advanced Card Technology Association of Canada
- Air Transport Association of Canada
- Association of Canadian Travel Agencies
- Association of International Customs and Border Agencies
- Canadian Airports Council
- Canadian Association of Tour Operators
- Canadian Civil Liberties Association
- Canadian Federation of Independent Business
- Canadian Federation of Students
- Canadian Snowbirds Association
- Canadian Soccer Association
- Canadian-American Border Trade Alliance
- Consumers' Association of Canada
- Institute for Citizen-Centred Service
- International Air Travel Association
- National Airlines Council of Canada
- Tourism Industry Association of Canada
- Vancouver International Airport Authority

One official from Foreign Affairs and International Trade Canada and another from the Canada Border Services Agency attended the round table session of May 17 with stakeholders from the tourism and travel industry.



One of Passport Canada's round table sessions.

#### Main findings from the round table discussions

The three round table events were a successful first step in Passport Canada's renewed commitment to engaging its stakeholders. Much like the online consultations questionnaire, the round tables allowed participants to weigh in with a variety of perspectives. The round tables were helpful in improving Passport Canada's understanding of its stakeholders' needs and expectations, as well as in challenging the organization's approach leading up to the service and fee proposal.

In many ways, the opinions shared at the round tables were consistent with comments provided by Canadians through the online questionnaire. These opinions include general support for the implementation of the ePassport; concerns about privacy issues; support for the 10-year validity period; and general satisfaction with Passport Canada's current service levels.

However, the round tables also enabled informed discussions on subjects that have not been raised in other forums. For instance, the issue of sharing identity data among government departments, levels of government and the private sector (i.e. banks) garnered interesting discussions. While some participants had concerns about privacy, others believed that this would mean more convenience for Canadians and a new role for Passport Canada in the field of identity management. Another

interesting topic discussed was efficiency at the land border once the new ePassport is implemented. Some industry representatives were concerned with the added time needed to process an ePassport,

The round tables enabled informed discussions on subjects that have not been raised in other forums.

and wondered whether a passport card-type document could be an option. The round tables also allowed for in-depth discussions on Passport Canada's current services, ways to improve these services and potential opportunities for Passport Canada to generate further revenue.

These discussions contributed greatly to Passport Canada's reflections on short, medium and long-term initiatives to improve the agency, and marked the beginning of a more consistent and fruitful relationship with stakeholders.

The round tables were structured around two main themes, detailed below.

#### Theme 1: The changing world of travel documents

The first presentation<sup>1</sup> provided an overview of the context for adopting the ePassport and discussed related security enhancements and privacy safeguards. It also raised awareness about potential benefits for travellers and innovations that other countries are pursuing in the field of automated border processing.

The main emphasis of the presentation was on the ePassport, also known as the biometric passport, which was first issued in 2004 by Belgium. It was noted that the ePassport is the new international norm, and that Canadians have largely been cushioned from additional international travel requirements, including the need to carry an ePassport. Canadians continue to benefit from one of the highest levels of visa-free access in the world.

It was noted that over 65<sup>2</sup> countries issue ePassports and adhere to an international technical standard set by the International Civil Aviation Organization (ICAO). At this point, Canada is the only member of the G8 that does not issue ePassports to the general public, although it has been issuing diplomatic and special passports as ePassports since 2009. Over 26,000 special and diplomatic ePassports had been issued as of May 2010.

#### Introduction of the ePassport

Participants at the travel and tourism round table applauded the introduction of the ePassport in Canada, since it will facilitate international travel for Canadians in the long term. Indeed, it was

Available on Passport Canada's website at: http://www.ppt.gc.ca/consultations/articles/2010-05-20.aspx?lang=eng.

 $<sup>^2</sup>$  According to the numbers available when the round tables were held. There are now more than 80 countries issuing ePassports. .

stated that the introduction of the ePassport may prevent the United States and other countries from imposing visa restrictions on Canadians in the future.

Moreover, it was pointed out during this round table that the ePassport will provide a strong link between the travel document and the individual, thanks to its biometric elements. One participant felt that the private sector was slow to understand this.

Another subject discussed at the travel and tourism round table was the way international travellers view security. There was a consensus that travellers tend to be interested in security issues and view anything that improves security positively, especially if it facilitates travel. One element of the increased security component of the ePassport is the diminished risk of identity theft.

Participants in the travel and tourism round table as well as the industry round table asked why Passport Canada had not begun issuing ePassports earlier. It was pointed out that, following the introduction of Canada's National Security Policy in 2004, three priorities were identified by Passport Canada, namely:

- 1. The repatriation of overseas passport printing to Canada, which was fully implemented in 2006
- 2. The implementation of facial recognition technology that would enable database searches to cross-reference individuals during the entitlement process and simplify the renewal process.
- 3. The introduction of the ePassport. It was evaluated at the time that it was preferable to ensure the other two priorities were met in order to be ready for the roll-out of the ePassport. This ensured that Passport Canada strengthened its passport issuance process before adopting the 10-year ePassport.

In addition to these organizational priorities, the changing international situation was also a factor. Canada was not facing the same pressure as many of the other countries now issuing ePassports. Many of these countries, as participants in the United States' Visa Waiver Program, were prompted to start issuing ePassports in order to avoid visa requirements for travel to the United States.

#### The electronic chip

Regarding some of the concerns expressed by the public surrounding the inclusion of an electronic chip in the ePassport, some travel and tourism round table participants wondered if Passport Canada had a better way to debunk the myths surrounding this technology.

During the industry round table, it was emphasized that privacy continues to be a major public concern about the ePassport. It was explained that the ePassport was specifically designed not to transmit information over a distance; this is why it uses a proximity chip, rather than a vicinity chip. The chips in enhanced driver's licences (EDLs) and ePassports are not the same; the EDL vicinity chip can be read at a much greater distance than the proximity chip used in the ePassport. Proximity technology was specifically selected to respond to privacy concerns. However, participants pointed out that the information on the ePassport chip is much more extensive than what is seen on EDLs, which would be problematic if it were read at a distance.

It was explained that the proximity chip must be held within 10 centimetres of an ePassport reader in order for the data to be accessible. Even then, the chip may be read only after the machine-readable zone (MRZ) is read by a reader, which means that the passport book must be open. Following an overview of the international situation, it was pointed out during the travel and tourism round table that there have not been any reported chip failures.

Similar questions related to the electronic chip were also brought up during the consumer round table, mostly related to privacy issues. The role of the Privacy Commissioner was discussed, along with Passport Canada's Privacy Impact Assessment and whether it would be made public.<sup>3</sup> There were also a number of questions about the use of the information on the chip by private sector enterprises such as airlines. It was noted that the chip could not be tracked at a distance. When participants asked whether it was possible to add any additional biometric data to the electronic chip, it was explained that Passport Canada does not have the mandate to do so; that it would pose an infrastructure challenge; and that the chip itself is not rewritable.

The industry round table discussed some of the reasons why the chip in the Canadian ePassport is not inherently biometric, but instead includes a biometrically-enabled feature: a high-resolution JPEG facial photo. It was noted that this follows international specifications, thereby ensuring that the photo can be used with whatever software border authorities are using in different countries.

It was emphasized during all three round tables that the purpose of the ePassport is to be read worldwide. It was pointed out that the chip's digital signature ensures that any tampering with the data on the chip or the data page of the passport would be evident upon verification. The information on the chip could in fact be modified by a fraudster, but the tampering would be flagged and the passport's Public Key Infrastructure (PKI) certificate would be nullified. The discussion then addressed the role of the PKI and the development of the ICAO Public Key Directory (PKD), which ensures sharing of PKI certificates among participating States.

#### What the ePassport will mean for applicants

During the travel and tourism discussion, it was pointed out that the introduction of the ePassport will not change the application process for the client and that processing times will not be significantly affected. It was also noted that, as a consequence of the public consultations surrounding the *User Fees Act* process, service standards may be modified to reflect public feedback.

One issue of primary concern that arose in this round table was the number of pages in the new 10-year ePassport. Currently, the proposed number is 36 pages. Participants wondered whether Passport Canada should offer business passports with extra pages.

<sup>&</sup>lt;sup>3</sup>This assessment is available at: http://www.international.gc.ca/about-a\_propos/atip-aiprp/passport-passeport.aspx?lang=eng.

#### The validity period

The decision to extend the passport's validity period to 10 years was very well received, but the desirability of offering adult applicants the option of a 5- or 10-year passport was debated in all three round tables. Many participants questioned the rationale of this offering.

While some in the travel and tourism round table were opposed to the idea and thought it impractical, others saw value in the choice it offered, especially for those with limited financial means and for those who may not need a 10-year validity term. The issue of renewal was brought up, as 5-year passports would require more frequent renewal, and many people tend to apply at the last minute. This was countered, however, with the statement that regardless of the validity period, people would know when to renew them. A number of participants strongly recommended that Passport Canada go forward with only the 10-year validity.

Participants in the consumer round table noted that the rationale for a pricing strategy whereby the fee would reflect the number of years of validity, so that the 5-year term would be offered at half the price of the 10-year term, was not acceptable. Some participants argued that the cost of issuance would remain the same for a 5- or 10-year passport.

On the other hand, one industry round table participant suggested that the price of the 10-year ePassport should be double that of the 5-year option, noting that anything less than double would create an incentive for the 10-year option.

It was also stated at the industry round table that the new validity period may mean that Passport Canada will need to change its focus from the production of passports to the management of passports in circulation. For example, some questions arose about a potential downside of the 10-year validity period due to changes in people's appearance over such a long period. It was emphasized that there needs to be assurance that facial recognition technology, which is based on the passport holder's facial structure, will be reliable over this period of time.

#### The role of biometric information

The issue of biometric information storage was brought forward in the travel and tourism round table as well as the consumer round table, along with a number of questions about Canadian and international practices in this field. It was noted that sharing stored biometric information is based on bilateral agreements between countries following strict guidelines and that current trends suggest that, while the capture and storage of biometric information remains the sovereign right of individual States, there is an increasing amount of biometric information being captured. When participants asked whether Canada will be storing biometric information from foreign nationals, it was explained that this issue falls outside of Passport Canada's mandate.

As part of an increasing trend, a number of States have begun capturing secondary biometrics such as iris pictures and fingerprints. Some States, such as members of the Schengen Area,<sup>4</sup> include fingerprints in addition to the facial photo. This led some participants to wonder whether there is a downside to Canada not applying these supplementary biometric elements. However, it was noted that current international biometric specifications require only the facial photo, which enables facial recognition. Some other States, such as the United Kingdom, have chosen not to add a secondary biometric. What's more, the majority of Automated Border Control Systems (ABCS) are currently based on facial recognition technology.

The discussion at the consumer round table also covered the increasing use of biometric information, which was perceived as a way of facilitating travel. However, there was some concern about the storage of biometric information by private-sector organizations, particularly airlines.

During the industry round table, participants suggested that the addition of a secondary biometric such as fingerprints in the ePassport could be a way to increase efficiency at the airport. The United States was cited as an example.

#### Alternative travel documents at the land border

In terms of market segments, it was noted during the travel and tourism round table that Passport Canada must have a strong knowledge of its clients in order to tailor its service offerings to their needs. For example, the number of passport applicants who only plan to travel to the United States must be considered, as they may look to alternative travel documents. This raised several discussion points about the use of the enhanced driver's licence (EDL) as an alternative travel document to cross the land border with the United States.

It was pointed out that there has been low uptake of EDLs, which may be explained by the fact that the passport is recognized as the only universal travel document. It was suggested at the industry round table that the reason for this could be the level of resistance on an institutional level in

It was suggested that Passport Canada should put more emphasis on a land border strategy. Canada, given a perception that the use of the EDL could result in a privacy breach. Uptake was perceived to be higher in the United States, where perceptions about privacy are different. It was mentioned in the course of this round table that while the ePassport seems right for air travel, it will result in considerable delays at the land

border due to the extra time that border officers will need to open the passport before they read the chip.

It was suggested that Passport Canada should put more emphasis on a land border strategy, and that a vicinity chip (the kind used in EDLs) should be considered for more effective border crossing, instead of the proximity chip. The privacy concerns were said to be minor in comparison to the

<sup>&</sup>lt;sup>4</sup> The Schengen Area is a free travel area comprised of 25 European States. Access to the Schengen Area fingerprint database is limited to members of the Schengen Area.

implications of a further thickening of the Canada-US border. Some participants mentioned that at the land border, every second counts. Moreover, the fact that the United States will proceed with exit controls at the land border – as early as 2013-2014, according to one participant – makes it imperative that vicinity technology be looked at more attentively by Passport Canada, according to some participants.

Another industry round table participant was in favour of finding ways to make the land border more efficient, but felt that this could be accomplished without using vicinity chip technology. This participant felt that this technology raises too many privacy concerns.

Participants at the industry round table suggested that the introduction of a "companion card" similar to the US passport card could become an additional service offered by Passport Canada and provide an important source of revenue for the organization. This suggestion was also brought up in the travel and tourism round table. In an attempt to limit privacy concerns surrounding such a card, it was suggested in the industry round table that the use of a new technology would make the vicinity chip readable only when the holder touches the corner with his or her finger.<sup>5</sup>

It was pointed out that one of the main issues to deal with in terms of land travel is the hierarchy of travel documents and that the passport has the distinction of being the only universally recognized travel document. Some participants at the consumer round table said that the issuance of different travel documents by different levels of government gave the impression of competition or disjunction between the federal government and provinces, in addition to causing confusion among Canadians. Participants felt that Passport Canada should play a greater role in the area of alternatives to passports to avoid confusion over accepted travel documents.

#### Automated Border Control Services (ABCS) at airports

Some questions arose about the impact of the ePassport on border processing. One subject that was discussed was the increasing use of ABCS that use ePassports at self-service kiosks to automatically clear passengers arriving in international airports, mainly through facial recognition. There is currently a pilot project at the Vancouver Airport that is only open to Canadian citizens and is based on the traditional machine-readable passport. After a year of operation, this project has processed over 320,000 travellers and has the potential to be upgraded for use with the ePassport. The implementation of any such system would fall within the mandate of the Canada Border Services Agency (CBSA).

During the travel and tourism round table, it was noted that the ePassport will solve the security dilemma caused by the absence of customs officers at ABCS using the current generation of passports, thanks to the inclusion of facial recognition in the ePassport-based ABCS.

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<sup>&</sup>lt;sup>5</sup>This comment refers to the use of visible and controllable radio-frequency identification tags that are touch-sensitive. The tag is activated by the holder when he or she touches the metal contact of the tag with a finger.

#### Theme 2: Passport Canada's current and future services

The purpose of the second presentation<sup>6</sup> was to provide participants with an overview of Passport Canada's current service offering, value proposal and opportunities to improve services, and to discuss results from public opinion research conducted since 2009.

#### Impact of the 10-year ePassport on cost

It was pointed out during the presentation that Passport Canada funds its operations using the fees that it collects for passport services. The organization does receive legislative appropriations for special projects from time to time, but in general, it operates on a full cost-recovery basis. While surpluses or deficits may occur from year to year, these are expected to balance out over a business cycle. Passport Canada can accumulate surpluses during this period, which can be drawn from in leaner years, but it cannot make a profit at the end of this period.

It was explained that Passport Canada's goal is to keep the price of the 10-year ePassport as low as possible, while sustaining its operations. There was a discussion about the current fee and the potential impacts of adding the cost of the chip technology to the current price of the passport.

Participants at the consumer round table wondered why the 10-year option would not be cheaper, based on the logic that it would require less passport processing over the 10-year period. It was noted that Passport Canada has a role to play not only in the issuance of passports, but also in dealing with passports that are in circulation. Passport Canada's Security Bureau plays an important role in this area.

At the industry round table, a predominant argument was that price should not even be an issue. It was argued that the justification for the fee, in a cost-recovery framework, is simply the cost of doing business and that if the validity period is to double, so should the fee. Participants felt that Passport Canada provides a very valuable product and that this product has a cost. They also stated that Passport Canada should take into account the fact that maintaining a high level of client access to passport services without a fee increase would not be feasible over time.

Another subject discussed during the travel and tourism round table was the potential impact of the longer validity period on Passport Canada's business model and passport demand prediction model because of the need to manage the 5-year dips in demand. Participants asked whether the 5-year ePassport would cost more per year of validity than the 10-year ePassport. They noted that there may be a rush for the cheaper, regular passport before the introduction of the ePassport, which may help Passport Canada mitigate any slumps in demand following the initial five years. Another suggestion was for Passport Canada to market the ePassport to the business sector before it is presented to the public, as a way of staggering demand.

<sup>&</sup>lt;sup>6</sup>Available on Passport Canada's website at: http://www.ppt.gc.ca/consultations/articles/2010-05-20.aspx?lang=eng.

During the consumer round table, there was strong support for the continued cross-subsidization of children's passports. Discussion also focussed on the importance of ensuring the passport remains affordable. It was proposed that one option could be a progressive tax system, since the passport, like healthcare, is a common good. It was suggested that Passport Canada could receive part of its funding through legislative appropriations, given the emphasis on ensuring that the passport is a secure travel document. Moreover, because of the implementation the Western Hemisphere Travel Initiative, a United States initiative requiring passports or alternative travel documents for Canadians (and others) seeking to enter the United States, it was felt that Canadian passport holders should not have to bear the full cost of heightened security. It was also noted that Canadians will want the price of the ePassport to be comparable to the price of a passport in other countries, regardless of whether or not other countries subsidize their passports through general government revenues instead of funding them on a cost-recovery basis like Passport Canada.

Participants at the travel and tourism round table agreed with the implementation of reasonable fees for services that are currently free, in view of Passport Canada's cost-recovery model. It was noted

It was suggested that Passport Canada could implement a controlled, cyclical fee increase schedule. that all services should have a reasonable cost. This approach would help ensure that the fee for basic passport services is kept at a minimum.

During the travel and tourism round table as well as the consumer round table, discussions emerged around the \$25 consular service fee that Passport Canada collects from all adult passport applicants but is unrelated to the

cost of issuing passports. The funds collected flow directly into general Government of Canada revenue, to offset the cost of providing consular services to Canadians abroad. The modalities and implications of the consular service fee were also discussed.

#### Adoption of a fee adjustment mechanism

It was suggested that Passport Canada could implement a controlled and reasonable cyclical fee increase schedule based on a formula that would be applied at reasonable intervals. This idea gained traction in all three round tables, and most agreed that a suitable period would be about every three or five years. It was noted that this would be preferable to the current *ad hoc* cycle in all round table groups, with particular vigour in the consumer round table and the travel and tourism round table.

It was also noted in the travel and tourism group that if the public knows when fee increases will occur, there could be surges in demand. However, any such mechanism must be handled with caution so that the organization does not start relying on fee increases as a solution to all issues. This concept had strong support in the consumer group.

#### Cost of replacing lost and stolen passports

It was noted during the presentation that approximately 55,000 passports were reported lost or stolen in 2008-2009, and that reporting and replacing these passports creates an additional cost for Passport Canada that is absorbed by all passport applicants.

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The findings of these public consultations are not statistically representative of Passport Canada's clientele or of Canadians. Passport Canada has attempted to present the opinions and suggestions shared by participants as objectively as possible. The organization will present its response to these opinions and suggestions at a later date.

In order to compensate for the increased cost of replacing lost and stolen passports, one idea that was presented was to increase the cost of replacement passports. This is done in Australia, where monetary penalties are charged according to the number of passports someone has lost or had stolen. This would help fund the extra security measures taken when an applicant applies to replace a lost or stolen passport. This idea was supported in all three round tables.

It was noted in the course of the consumer round table that there is little sympathy for people who lose their passport or have it stolen, given the importance of the document. Charging more for a lost passport could be a good deterrent to individuals who are not careful with their passport.

#### Passport Canada and identity management

In all round tables, increased cooperation between Passport Canada and other federal and provincial services was proposed as a way to increase efficiency and reduce the impact on clients. In particular, sharing more information with provincial and territorial vital statistics registrars would be beneficial. However, it was noted that privacy laws ensure that federal departments work in silos and keep personal information separate, unless otherwise required.

During the industry round table, the potential for a new identity management strategy at the federal level was evoked, with Passport Canada playing a key role by offering a voluntary identification card that would be proof of identity in Canada. This would reduce costs for the multiple provincial, federal and territorial entities who repeat various levels of the identity vetting process.

Another idea that was raised was a partnership with banks to provide a service for identity confirmation, based on the example of the United Kingdom, where the passport can be used as proof of identity and banks can contact the UK passport office to confirm that the passport and the information therein is valid. This idea was brought up in all round tables and while it gained traction in the industry group, there were significant misgivings in the travel and tourism round table and in the consumer group because of privacy issues.

#### Suggestions for future services and partnerships

The potential of online applications was brought up during the travel and tourism round table. It was noted that some States are examining ways to accommodate online renewals, as well as the possibility of submitting some information online for first-time applicants, followed by a visit to the office to submit the remaining documentation. It was suggested that Passport Canada work with the private sector to develop a system to do this. Another question asked was how guarantors would be worked into an online environment. The role of guarantors, and whether they are necessary in this day and age, was put into question.

In the travel and tourism group, ideas emerged around the role that frontline, private-sector staff, such as travel agents, could play in distributing passport information and vetting applications. It was noted that this possibility had been dismissed in the past, but could be mutually beneficial in the future.

During the same round table, the potential for outsourcing some of the process was discussed, but the presenters noted that the entitlement and review process must remain with Passport Canada, as stated in the Canadian Passport Order. If there were an increased reliance on receiving agents and partnerships with the private sector, this would permit Passport Canada to close a number of offices while maintaining a wider service network.

An additional service that was discussed in the travel and tourism and consumer round tables was the possibility of taking photos at the passport office. While it was noted that this may have an adverse effect on local photographers, there was a general sense of approval for the idea, as it would ensure that the photos conform to International Civil Aviation Organization (ICAO) specifications and could provide further revenue.

During discussions surrounding the possibility of introducing service bundles, a number of options were discussed, such as the development of a consumer protection plan, or applying for a NEXUS card and a passport in a single application. This idea was discussed in both the travel and tourism and industry round tables.

Some participants in the industry round table suggested that advertisement and sponsorships could be an option to create additional revenue. They mentioned that partnerships with duty-free shops, limo services, airport shops and other travel-related services should be taken into consideration. However, the option of private sector advertisement was not well received in the travel and tourism and consumer round tables. It was noted in both of these round tables that a potential source of income could be to form partnerships with other federal programs. The consumer round table was wary of private sector involvement and outsourcing.

Several round table participants felt that Passport Canada's service standards exceed expectations. An important point about organizational sustainability during the transition was made at the industry round table. Participants wondered whether there is any latitude from Foreign Affairs and International Trade Canada that could help stabilize fluctuations through legislative appropriations.

Participants also wondered whether these fluctuations would lead Passport Canada to lay off staff and/or close offices, then rehire and reopen a few years down the road. If this course of action were being considered, participants felt that it would be counterproductive and that there would be a strong business case against it.

Participants at the industry round table felt that current service standards exceed expectations, which means that Passport Canada has some leeway to change them. It was noted that while urgent services should be readily available, an average processing time of 30 days seemed reasonable for a regular passport application. It was also noted that perhaps a 10-day turnaround time could be part of an added service charge. The view that Passport Canada's two-week service standard exceeds expectations was echoed by some participants in the consumer round table, who noted that passport offices are not needed at every street corner.

It was also suggested during the travel and tourism round table that people could be charged extra to keep their expired passport as a souvenir.

It was noted that currently, children are defined as 15 years of age and younger, which means that a minor who is 16 years of age or older is treated as an adult. Participants were asked whether 16 and 17 year olds should be considered to be children in the context of the passport program, which would allow Passport Canada to issue passports to them while recognizing custody agreements where travel restrictions are stipulated. Moreover, it would be cheaper for parents for those two additional years, given the lower fee for children's passports. There were no objections in the industry round table or in the travel and tourism group. Participants felt that passport fees for children should definitely be lower than passport fees for adults. This raised a number of questions in the consumer group, notably about international standards regarding age, which vary from State to State. However, few strong positions were taken by participants on the subject of age.

Lastly, participants in the consumer round table suggested having renewal notifications, whereby passport holders would receive a reminder when their passport is about to expire. However, it was pointed out that this could cause logistical difficulties, as Passport Canada cannot oblige people to provide their new contact information if they move.

#### Online questionnaire

A consultations questionnaire was posted on Passport Canada's website from April 6 to May 7, 2010.<sup>7</sup> A paper version was also available on demand. The purpose of the questionnaire was to allow Canadians to provide Passport Canada with their views and opinions on:

- passport services in general;
- ways to improve Passport Canada's products and services;
- Passport Canada's service delivery network;
- turnaround times; and
- ways to keep the price of the passport as low as possible.

The results of the questionnaire will help Passport Canada evaluate trends and develop a sound basis for further decision-making. However, it is important to note that the questionnaire produced results that cannot be used to make generalizations about all Canadians, or about Passport Canada's clientele.

Participants had the opportunity to answer six open-ended questions on the subjects mentioned above. The purpose of the open-ended questions was to allow participants to express themselves freely, in their own words. In this spirit, all responses quoted in this report are repeated as stated.

Participants were also asked nine demographic questions. This provided Passport Canada with a means to loosely associate certain opinions and views with different client groups, such as frequent and infrequent travellers, people living in metropolitan areas or in rural and remote areas, and Canadians living abroad.

The number of participants was impressive: 7215 people took the time to complete the questionnaire. It should be noted, however, that not all participants answered every question, as none of the questions were mandatory.

7215 people took the time to submit a questionnaire. Most expressed support for the ePassport. Overall, most participants expressed support for the ePassport, although some expressed concerns about privacy. Strong support was shown for the 10-year validity period, which was perceived as a means to keep costs down and improve service. In fact, many participants focused solely on the benefits of extending

the validity period throughout the questionnaire, regardless of whether the specific question was about turnaround time, the service delivery network, cost savings or security aspects. Some gave positive feedback on the current service offering, while others shared suggestions to improve accessibility to passport services through a host of means, including greater online access, an expansion of criteria for renewals, longer office hours, more offices and faster turnaround times.

<sup>&</sup>lt;sup>7</sup> A sample questionnaire is available on page 41.

#### Main questionnaire findings

When asked about ways to improve the Canadian passport from a security perspective, beyond the adoption of the more secure ePassport, many participants pointed out the importance of staying abreast of technological advances in travel and identity document security. The most common security-related suggestions included:

- adding more security features to either the application and entitlement processes or to the passport book itself;
- capturing one or more biometric features, including fingerprint scans;
- better information sharing;
- improving security processes, such as reference checks; and
- enhancing security features in the passport book, such as holographic photos and adding new embedded security features.

Some participants suggested that extending the validity period from 5 to 10 years would be helpful to Passport Canada in areas other than security. For instance, the extended validity period was cited as a way to keep costs down and to facilitate international travel.

Some participants expressed concern about the impact of the ePassport and biometrics on the protection of personal information in the passport. Some were worried that the electronic chip in the ePassport could lead to monitoring or surveillance of Canadians by unauthorized parties and could increase instances of counterfeit passports and identity fraud by making personal information accessible electronically.

Many participants recommended a more durable passport cover to reduce the possibility of damage over time. Some also asked to have a card-sized passport that would fit in their wallet.

#### Fact check

The information stored on the ePassport chip is protected from unauthorized reading. The chip must be held within 10 cm of an ePassport reader in order for the information to be accessible. What's more, the passport book must be open. If someone were to read the data stored on the chip, they would see no more information that what is visible to the naked eye on page 2 of the passport.

When asked about ways to improve Passport Canada's service delivery network, many participants provided positive feedback and expressed their satisfaction. Of those who suggested improvements, participants most often suggested:

- online processing;
- more offices:
- more staff at offices;
- being able to make an appointment at an office;
- extended business hours; and
- improving or guaranteeing passport turnaround times.

To keep the price of the passport as low as possible, participants were most likely to suggest extending the validity period of the passport from 5 to 10 years, given the common assumption that a longer validity period will reduce costs. Other suggestions included:

- government funding to subsidize passport fees;
- operational efficiencies; and
- more online services.

When asked for suggestions to improve Passport Canada's operations, services and turnaround times, a majority of participants left the question unanswered. Some provided positive feedback about the status quo, while others suggested extending the validity period to 10 years. A few made suggestions about online services, improved or guaranteed turnaround times and improved access to passport services through extended business hours, more convenient office locations and more staff.

#### **Fact check**

Although passport applicants who opt for the extended validity period will have to renew their passports less frequently, this will not result in cost savings for Passport Canada. The adoption of the 10-year ePassport is a necessary and costly step forward that requires significant changes to Passport Canada's internal security processes and technological infrastructure. Passport Canada must keep pace with the latest advances in travel document standards and technologies.

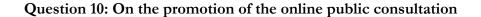
Participants living overseas were the most likely to request improved access to services. This group was also more likely to provide suggestions to improve turnaround times. Many overseas participants expressed concerns specific to passport services for Canadians living abroad, including:

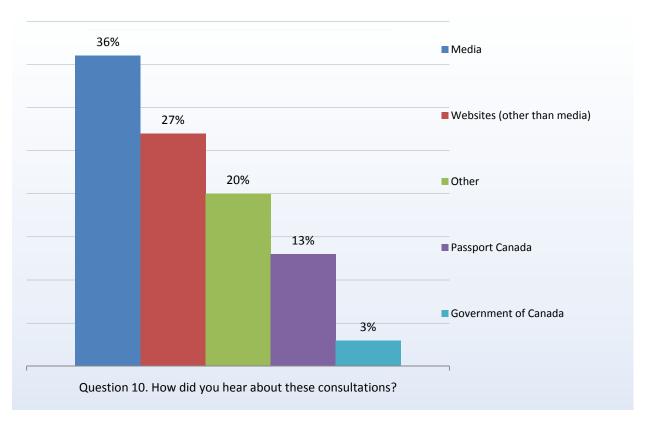
- not being eligible for the simplified renewal process;
- the guarantor policy, stating that it is difficult to find an acceptable Canadian citizen abroad for this purpose; and
- access to points of service abroad.

Participants living in rural areas were more likely to suggest ways to improve service access and availability, and less likely to suggest online services. This group also provided suggestions about having offices closer to their place of residence or work, and extending business hours into the evenings or weekends.

#### Detailed findings by question

The following analysis deals with questions 10, 12, 13, 14 and 15 of the questionnaire. All other questions were demographic questions that helped Passport Canada get a better understanding of the participants.

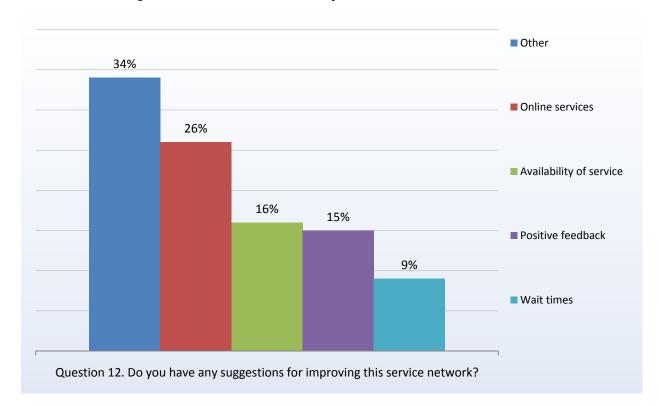




When asked how they heard about the online consultations, more than a third of participants said they had heard about it through the media. The second most popular answer was through non-media websites. For those who heard about it through the media, the CBC was most often listed as the source.

Participants living in Canada were more likely to have heard about the public consultations through the media than those living abroad. Conversely, participants living abroad were more likely to have heard about the consultations through non-media websites.

Among participants who said they had a passport, those who had applied in person were more likely to have heard about the questionnaire from a government representative than those who applied by mail. Younger participants were more likely to have heard about the questionnaire through the media, while older participants were more likely to have heard about it through a travel agency.



Question 12: Passport Canada's service delivery network

For this question, the most common suggestions involved providing online services such as online applications, photo submission and passport renewals. Many of those who suggested online services cited convenience and cost savings as possible benefits. Some participants made suggestions about how to manage information and best practices.

"Develop an online web application process for ease of entry; could by supplemented by a centralized help desk with an optional review by a local officer if necessary. CRA [Canada Revenue Agency] Partnership - Option to apply for a CDN passport at the tail end of completing annual taxes, where a significant body of relevant personal information has already been collected and reported. With permission, Canada Passport could mine data fields for the CRA return, speeding up data entry for the applicant."

- Participant from Alberta, 35 to 44 years old, travels two to three times a year

Another common suggestion to improve Passport Canada's service delivery network was generally improving the availability of service. These comments were more likely to come from participants living in rural areas and passport holders who applied by mail. Suggestions in this category included:

- an expanded office network;
- longer business hours;
- weekend hours; and
- more staff on-site.

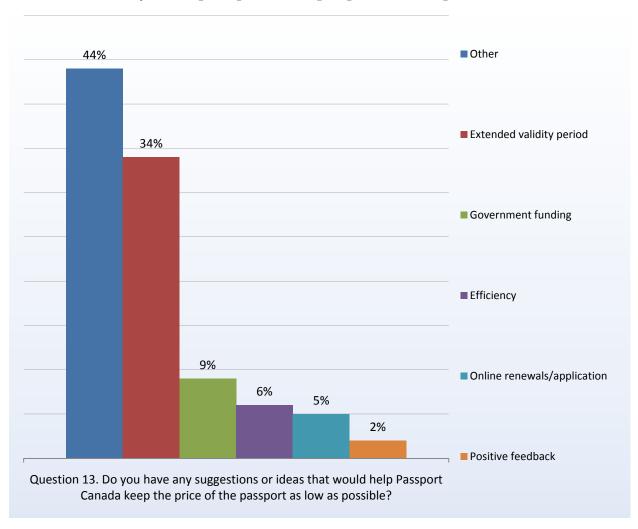
The findings of these public consultations are not statistically representative of Passport Canada's clientele or of Canadians. Passport Canada has attempted to present the opinions and suggestions shared by participants as objectively as possible. The organization will present its response to these opinions and suggestions at a later date.

Many participants provided positive feedback to this question. Some suggested improving the service delivery network by improving office wait times. Passport holders who applied in person were more likely to provide positive feedback than those who applied by mail. Participants living abroad were more likely to suggest quicker turnaround times.

Nearly half of the participants did not provide an answer to question 12. The suggestions that were received, in addition to those mentioned above, included:

- providing a better explanation of the application process;
- standardizing services;
- improving the mail-in process or improving turnaround times for mail-in applications;
- improving the passport renewal process;
- offering appointments; and
- taking passport photos on-site.

Question 13: On ways to keep the price of the passport as low as possible



The most common suggestion in response to this question was to extend the passport's validity period. Many participants assume that a 10-year ePassport will be less expensive to produce. Some participants assume there will be no price difference for a 10-year passport due to efficiency gains and savings that would be passed on to the client.

"Definitely increase the expiry to 10 years and there should be no price difference!!!! After all, what is the difference from printing the expiry year be it in five years time or ten years? This would help reduce the workload and enable existing workforce to focus on maintaining service levels or improving service. Set up online access to passport information, like Canada Revenue Agency. My Account, where Canadians can easily go in an update some information (like address, contact information) and can be used for application renewal or to report if a passport has been lost or stolen. Don't have problem with adding digital photo and tombstone data to a chip embedded in the passport."

- Participant from Ontario, travels more than three times a year

"I strongly support the proposal to issue passports for ten years rather than five. Besides reducing your agency's administrative burden, it will save passport holders money and a great deal of inconvenience. In addition, it will enable Canadians to make full use of the long-term multiple-entry visas issued by countries such as Brazil. Although it would add a small amount to the cost, I recommend the addition of extra pages for stamps, especially if the passport is indeed extended to ten years. A single visa can take up a whole page, and the various entry and exit stamps quickly accumulate for frequent travelers."

- Participant from Quebec, 35-44 years old, travels more than three times a year

#### **Fact check**

The purpose of the 10-year validity period is not to reduce costs, but rather to increase convenience for Canadians and to bring Canada into line with a growing number of countries, including the United States, France, the United Kingdom and Australia, that issue 10-year ePassports to their citizens.

Some participants suggested government funding as a way of keeping the cost of the passport as low as possible. These individuals often expressed their view that Canadians have a right to travel. They also referred to other instances where taxes are used to fund items that do not necessarily benefit or apply to every Canadians citizen.

"Request special funding from the Federal Government for the initial start up costs of the E-Passport. I believe I understand why Passport Canada operates on a cost-recovery basis (only people who apply for the passport should pay for the passport) however a Passport is becoming a vital piece of identification which all Canadians should own. I do not have children, yet I pay school board taxes. I do not resent paying for the education of other people's children. I believe SOME federal tax money should be allocated to Passport Canada."

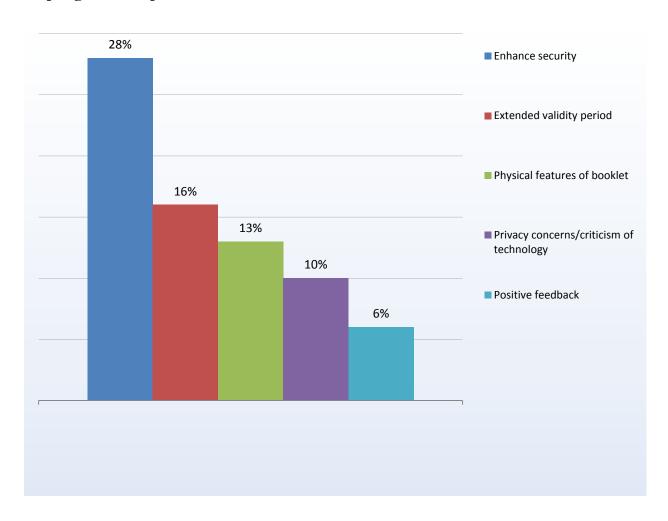
- Participant from Ontario, travels more than three times a year

Many participants did not provide an applicable response to question 13. The relevant suggestions received, in addition to those mentioned above, included:

- charging an extra fee for express and urgent applications;
- reducing staff;

- taking passport photos on-site;
- providing a discount for seniors, families or veterans;
- outsourcing for cost savings;
- providing self-serve kiosks;
- reducing fees for renewals;
- reducing or freezing wages; and
- charging different fees for different types of applications, such as in-person or mail-in applications.

Question 14: On additional ways to improve the passport and enhance security, beyond adopting the ePassport



For question 14, the majority of participants did not provide an applicable answer or did not respond. Of those who did provide a relevant answer, many suggested enhancing the security of the passport by adding more security features. Some participants suggested adding additional biometrics to the passport to make the process more secure and efficient. These participants felt that this would help ensure that passports are used by their rightful owners, and that it would improve renewal services and services abroad.

"Attach a fingerprint recognition scan to the original file application which can be stored electronically and when passports are presented in other countries during visits your fingerprints can be scanned and it could validate the information on the passport. It should also make renewals more reliable similar to renewing your license - all that is required would be an updated picture. This can also help identify Canadian citizens travelling abroad that lose their passports or have them stolen. A visit to a Canadian consulate would certainly streamline the identification process."

- Participant from Ontario, 55 to 64 years old, travels two to three times year

Other participants suggested making improvements in the area of information sharing or having stricter security requirements for passport applicants.

'Increase background checks on applying individuals. Require face-to-face interview (either when applying for or when receiving the passport) for first-time applicants. I would not be averse to supplying a fingerprint or iris scan if these inclusions would increase the safety of air travel and reduce security costs/processing times."

- Participant from Alberta, travels two to three times a year

The second most common suggestion was to extend the passport's validity period. Many of these suggestions were focused on the assumption that this would bring about cost savings, much like the responses to question 13.

"Do what most other countries do and make the passport valid for 10 years. Right now, we have to pay every 4 ½ years for a new passport, since many countries require that the passport be valid for 6 months after your return. This gets very expensive."

- Participant from Ontario, 45 to 54 years old, travels two to three times a year

Other participants focused on the convenience or practical travel implications of the extended validity period. These participants often mentioned the fact that other countries issue 10-year passports, or told of difficulties encountered when travelling with a 5-year passport.

'I love that you are considering the option of a 10 year passport. Since I am currently working in the US, and they want foreign employees to have a new valid passport 6 months in advance of their old passport expiring, which effectively makes my 5 year passport only good for 4 1/2 years. Having the option of a 10 year passport

would be fantastic. My parents are UK citizens, and their British passports are good for 10 years. I've always hoped that Canada would consider extending our passport life to 10 years."

- Participant living outside of Canada, 25 to 34 years old, travels more than three times a year

The third most common suggestion was enhancing the physical features of the passport book itself by:

- making the cover more durable;
- providing a passport card; or
- changing the size of the passport book.

Other comments about the physical aspects of the passport were focused on convenience, such as being able to fit the passport in your pocket or making the booklet more durable.

"Make it the size and construction like the driver's license or health card... better yet, combine all 3 documents on one CANADA ID card. Way cheaper right? Renewal can be automatic when you pay your federal taxes, i.e. tick a box that says you need a new passport, put the cost on my taxes."

- Participant from Ontario, 55 to 64 years old, travels more than three times a year

Many participants mentioned their concern about the vulnerability of the electronic chip, both from a security perspective and a privacy perspective. Some participants assumed that the chip technology in the ePassport would require a protective sleeve or barrier to prevent the data from being constantly broadcasted and made suggestions to this effect.

'I have no problems with the concept of e-Passport, however I have MAJOR concerns about privacy. I'm assuming that an e-Passport would contain a Radio Frequency Identification device. Some of these can be scanned from a distance. I would insist that such a passport come WITH a radio-opaque case or sleeve that would require the passport holder to remove the passport from the case to be scanned."

- Participant from Nova Scotia, 55 to 64 years old, travels once a year

"Ensure that the passport has a screening cover to it so as to prevent it being read unless it is open. The passport should have to be passed directly in front of a reader not flashed by the reader as is done at current border services computers. Currently these new tags can be read if I have it in my shirt pocket or am carrying it in my hand or bag around an airport. Should ensure the new passports will be secure from all but those who have the right and necessity to read them."

- Participant from Alberta, 65 to 74 years old, travels once a year

Some participants stated their belief that Canadians should have the option of choosing a non-electronic passport.

#### **Fact check**

The Canadian ePassport does not need a protective sleeve or case to prevent unauthorized parties from reading the data on the chip. The ePassport uses tested safeguards. The ePassport chip must be held within 10 cm of an ePassport reader in order to be read, and the booklet must be open in order for the information to be accessible.

"Either not include the chip in a so-called e-Passport, give an option to select a non-e-Passport, or mount an education campaign to convince Canadians like myself that these e-Passports are safe, as I believe they are still not as secure as the Canadian government thinks they are. RDIF [radio frequency identification] technology like this can still be hacked by criminal organizations with the right technology and the possibility of my information being picked up by a RDIF reader and then decoded and possibly used for criminal activities without it even being stolen is very worrisome to me."

- Participant from Ontario, 25 to 34 years old, travels more than three times a year

A few participants were concerned that the government has not sufficiently tested ePassport technology. Specific media stories were sometimes used to illustrate the assumed risk of information theft or the ineffectiveness of the electronic chip.

"a) The e-Passport chip technology has already been proven to be unreliable (i.e. see the Elvis impersonator in the U.K. for details). Has this unreliability been rectified? If not, then use of the technology is a waste of money and time and provides an unrealistic sense of security where none exists. b) Your notes indicate that the use of a digital signature will improve security amongst other countries around the world, however the latest figures indicate only 12 countries currently utilize integrated security technology to make use of the digital signature - it would appear therefore that the use of this security feature is over-hyped and used solely as a selling point for appealing to Canadians to accept the new technology before it is widely implemented. We will thus run into the issue of a perceived security feature having no significant value but which is certain to require an increased user fee. c) There does not appear to have been any form of transparent, verified public reporting."

- Participant from Ontario, 45 to 54 years old, never or rarely travels

Some participants provided positive feedback, stating that Passport Canada is doing a good job and that nothing in particular should be changed. This praise was mostly focused on:

- efficiency;
- quick turnaround times; and
- ease of access.

"I was actually impressed with the service at the Passport office this time around. There was no waiting, was in and out in about 10 minutes. The way the office is set up seems to be more conducive to getting people in and out quickly. Also being able to be a current passport holder guarantor really saves a lot of time."

Participant from Ontario, travels two to three times a year

#### **Fact check**

ePassport technology has been tested extensively. ePassports have been the standard recommended by the International Civil Aviation Organization, a body of the United Nations, since 2003. The chips used in the Canadian ePassport are proximity contactless chips that must be held within 10 cm of an ePassport reader in order for the data on the chip to be read. Moreover, the passport book must be open first. If someone were to access the chip, the only information they would find is the same information that is visible to the naked eye on page 2 of the passport. No additional information about the passport bearer can be added to the chip. If the data on the chip is tampered with, this will be evident to a border agent equipped with an ePassport reader, as the digital lock on the chip will be broken.

A number of participants provided input regarding Passport Canada's policy on the definition of sex or gender and the inclusion of an individual's sex on the passport. This has consequences for the transgender community and several suggestions were made in regards to this issue.

"To only include gender and not sex on the Canadian passport so that individuals from the transgender community do not face serious ramifications in other countries for the potential discrepancy between their physical sex (on their passport) and their gender identity and presentation."

- Participant from Quebec, under 25 years old, travels two to three times a year

"Remove the sex designation from passports, or at least make it easier for transgender individuals to list the correct sex on their passport. As many provinces (like Quebec) have a surgery requirement to change the sex on one's birth certificate many transgender people have to travel under a passport with a sex that does not match their appearance or identity which can put them at serious risk. Allowing the sex on one's passport to be updated easily or removing the sex designation from Canadian passports entirely would allow transgender people to travel much more safely."

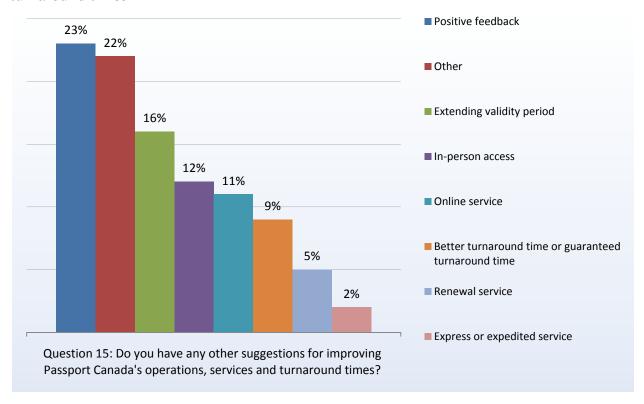
- Participant provided no demographic information

#### Other suggestions included:

- maintaining passport validity at 5 years;
- increasing the cost of a replacement passport if the original is lost or stolen; and
- eliminating mail-in applications or requiring that clients pick their passport up in person.

In addition, a few participants criticized passport photo requirements.

Question 15: On other improvements to Passport Canada's operations, services and turnaround times



While question 14 focused on security issues and question 15 was about service, many of the same topics came up. The extended validity period, which was mentioned frequently in question 14, was the most popular answer provided for question 15. Many participants felt that the 10-year option was an obvious next step and that Canada should keep pace with other countries. Many participants also suggested specific costing strategies or models.

"I believe Japan does offer to its citizens the choice of either a 5 years validity passport or a 10 years validity passport. I believe it is a great idea and Canadian citizens can, depending on their needs, choose to either have a 5 years validity passport or a 10 years validity passport. I suggest that the 5 years validity passport should remain at its same price and that the 10 years validity passport should be priced around the same as the Japanese one."

- Participant from Quebec, 25 to 34 years old, travels two to three times a year

Travellers and older participants were more likely to suggest a longer validity period. Some participants described the benefits of the 10-year validity period, but expressed concern regarding the option of a 5- or 10-year validity period.

'I don't mind paying a bit more for security. Having said that, I do think it's a great idea to have the option of the passport expiring in 10 years. This 5 year option is nonsense especially when most countries now have adopted the 6 month rule."

- Participant from Ontario, 35 to 44 years old, travels once a year

The second most popular suggestion was improving access to in-person services. These suggestions focused on:

- extended business hours;
- more staff on-site;
- the option of making an appointment at an office; and
- more offices.

"The line ups at the regional office are too long and only open 8 am to 4:30 pm so I would have to take a day off work to apply for a passport in person. Most people who work a day job have the same issue. To improve service, you can open additional locations that are open during the evenings and weekends."

- Participant from Ontario, 35 to 44 years old

Some participants discussed the disadvantages of providing mobile passport services instead of opening offices in more remote areas.

"I was able to renew my passport at a mobile passport office that came to Sudbury, On. The lines were extremely long (we just barely made it) and it doesn't accommodate to those who may be working as I had to leave work like many others. A mobile office that was also open on weekends, more hours, and more than two days would ease the demand. As well, a permanent office would be best."

- Participant from Ontario, under 25, travels two to three times a year

Other suggestions for improved access focused on services offered overseas. Many participants living abroad requested improved access to services and mentioned difficulties they encountered due to differences in policy for applicants abroad, compared to those who apply in Canada.

'I think that you should allow Canadians living abroad to mail their passports to Canada for renewal if they do not have a consulate where they are living. I lived in Micronesia for 5 years and had to mail my passport to Australia, which was complicated. It would have been easier to be able to mail it back to Canada."

- Participant living outside Canada, 25 to 34 years old, travels more than three times a year

Another suggestion was to provide various types of online services, including online renewals, online application forms and online photo submission. There was a range of suggestions from participants on this topic. For some, the distance between their place of residence and the nearest point of service was a factor. Others reasoned that if it is secure to complete financial transactions online, or

if other countries have online passport applications, Passport Canada should be able to offer online applications as well.

"Secure online applications would work for many people and facilitate mail service. I read somewhere that Web applications had been suspended, but with proper security there is no reason why this could not continue. The banks guarantee secure access to accounts."

- Participant from British Columbia, 65 to 74 years old, travels or three times a year

"Online application service like that done by Australia, where part of process is online, then appointment is made at a post office that scans the photos and documents, then passport is sent to post office for pick up in person."

- Participant living outside Canada, travels once a year

Some participants recommended improved or guaranteed turnaround times. A number of these comments came from Canadians living abroad.

"There should be quicker turnaround times when applying at offices abroad. I live in one country, but the nearest office is in another country. It has taken up to six weeks for passport processing. It is unacceptable to be living abroad and to be without a passport for such a long time."

- Participant living outside Canada, 35 to 44 years old

Other suggestions were about improving passport renewal services, including:

- notifying passport holders when they are eligible for renewal;
- faster processing for renewals;
- reduced cost for renewals;
- simplifying the renewal process; and
- offering online renewal service.

"The process is very lengthy, and despite having renewed a passport countless times, it seems every time I go to do it again, there's a problem. This field wasn't filled out completely, your picture happens to be a smidge to the left or your mouth was open a bit, your guarantor didn't sign with their passport number, etc. All in all, it makes the process difficult and unwieldy. It should be easier and more straightforward. Eliminating the need for a guarantor for passport renewals was a good step, in my opinion. Other initiatives like this need to be put in place (taking digital photos at Passport Canada offices instead of having to get them taken on my own? Providing document verification services that don't require references to be listed?) - these sorts of things would streamline the process and make it more efficient."

- Participant living outside Canada, 25 to 34 years old, travels more than three times a year

Participants living abroad or in the United States expressed frustration about restrictions related to the renewal process. Some were worried about the prospect of not having a passport while their application is being processed.

"Make it easier for Canadians living in the US to renew a passport. I was issued my last one outside of Canada and therefore I am not eligible for the simplified renewal. As I live in the US it will take 4 week, plus mailing time. I travel constantly for work - am I meant to stop working for 6 weeks. I mean really."

- Participant living in the United States

Most participants did not provide an answer or an applicable answer to question 15. Of those who provided a relevant answer, most gave positive feedback and indicated they could not think of any way to improve passport services. Those who did have comments mentioned the following:

- a passport fee increase;
- better training for staff;
- a tracking system for passport applications (online or other ways);
- having a PIN, much like credit cards;
- not extending the validity period; and
- having the passport expire on the bearer's birthday.

#### Other client and stakeholder comments

Seventy-five letters were sent to client and stakeholder organizations that have a potential interest in Passport Canada's consultations on services. While feedback was minimal, the following organizations provided constructive and useful comments that will be taken into consideration.

#### Conseil du patronat du Québec

In its submission, the Conseil du patronat du Québec welcomed the adoption of the 10-year validity period, pointing to the inconveniences of the 5-year validity period. According to the Conseil, the shorter validity period makes it more difficult to obtain visas, work permits

#### Fact check

Many countries already scan travellers' passport photos or take photos of their own when foreign nationals enter their territory. The point of a passport is to let border authorities know who you are. It is each country's prerogative to define its own entry requirements.

and contracts abroad. The Conseil applauded the introduction of the ePassport, in light of the current international environment, as a way of facilitating travel for Canadians. It encouraged the government to make these changes quickly so that Canadian travellers and the Canadian economy can reap the benefits as soon as possible. The Conseil also made note of Canada's relative tardiness in implementing the ePassport on an international level. Moreover, it recommended making similar changes to the NEXUS program.

#### **Canadian Civil Liberties Association**

In its submission, the Canadian Civil Liberties Association (CCLA) took note of Passport Canada's rationale behind the adoption of the ePassport, agreeing that increased security and authenticity is a laudable goal.<sup>8</sup> The purpose of the submission is to ensure that the ePassport is implemented with adequate safeguards.

The CCLA urged Passport Canada to be clear on the possible uses of the data included in the ePassport. The organization asked for more information about the measures that Passport Canada will take to ensure that Canadians' civil liberties are protected. The majority of the comments submitted were requests for additional information.

One such request for additional information was about the existing and potential future safeguards to limit the retention of information found on the ePassport chip, including the JPEG photo, by foreign States. Another request concerned the safeguards surrounding Passport Canada's internal database on passport holders, including the use of the database by governmental third parties, and its potential use as a means of cross-checking with international criminal, no-fly, and terrorism watch lists. The CCLA also asked whether passport holders have a right to access and request changes to their personal information.

<sup>&</sup>lt;sup>8</sup>For the complete text of the written comments submitted by the CCLA, please consult the CCLA website at http://ccla.org/our-work/national-security/privacy-and-national-security/biometric-passports.

In terms of additional privacy concerns, the CCLA requested that the Privacy Impact Assessment be made available to the public, along with Passport Canada's comments on how it plans to address some of the issues raised. In addition, the CCLA requested that Passport Canada provide information on the measures that will be taken to address false acceptance and false rejection rates due to the use of facial recognition technology, and what recourse will be available to individuals falsely identified.

The CCLA recommended that Passport Canada take steps to prevent surreptitious reading or cloning of the RFID chip, and requested information on the measures Passport Canada is planning to take to do so. In addition, the CCLA approved the use of Public Key Infrastructure (PKI) technology by Passport Canada and requested additional information on the timelines for its international implementation and challenges that may arise.

#### **Fact check**

A Privacy Impact Assessment done for the special and diplomatic ePassport pilot project launched in January of 2009 is available on Passport Canada's website at www.passportcanada.gc.ca.

#### Fact check

The Canadian ePassport includes many safeguards to prevent unauthorized reading of the chip.

#### The next steps in Passport Canada's *User Fees Act* process

The *User Fees Act* defines the steps that must be taken by federal departments before introducing new services and fees or making changes to existing services, service standards or associated fees. This process is illustrated below.



First, the department must consult Canadians and give them an opportunity to suggest service improvements. Passport Canada accomplished this using the three consultations vehicles detailed in this report. The findings presented here are currently undergoing extensive analysis.

Passport Canada is committed to reporting back to Canadians on the results of this analysis and to benefiting from the input received. In upcoming documentation, the organization will provide its response to the opinions and suggestions shared by clients and stakeholders in the present report. Specifically, Passport Canada will explain:

- which of the findings from the consultations can be acted upon once the new fee structure is in place;
- how they will be implemented; and
- which suggestions cannot be pursued, and the reasons why.

Passport Canada will rely in great part on the present report when designing the service and fee proposal. The proposal must include service standards and be accompanied by information on costs and revenues, as well as data about similar services in other countries.

When the service and fee proposal is published, Canadians will have the opportunity to take part in a formal complaints process. If a complainant is not satisfied with Passport Canada's response, he or she will have the option of requesting an independent advisory panel. Recommendations made through the complaints process are not legally binding, but all complaints and outcomes of panel proceedings will be taken into account when Passport Canada's final proposal is tabled in Parliament by the Minister of Foreign Affairs.

The final proposal must include the results of the public consultations, service standards, a detailed fee structure, a fee impact assessment, a three-year costing analysis and an international comparison of passport services and fees, as well as the recommendations of the independent advisory panels, should these panels take place.

If Parliament approves the proposal, the new fee structure to support the adoption of the higher-security 10-year ePassport and other possible service enhancements will be implemented when the ePassport is rolled out, starting in 2012.

### Sample questionnaire

Passport Canada's interactive consultations questionnaire was available online from April 6 to May 7, 2010. Paper copies of the questionnaire, like the one reproduced below, were also available on demand.

#### Consultations on service improvements

Part 1 – Questions 1 to 1	0 will help us get to know	you a little better.	
1. Where do you live?			
Alberta	Newfoundland and Labrador	Ontario	Yukon
☐ British Columbia	☐ Nova Scotia	Prince Edward Island	Other - if you live outside Canada
☐ Manitoba	☐ Northwest Territories	Quebec	outside Canada
New Brunswick	☐ Nunavut	Saskatchewan	
2. What are the first three	e characters of your postal o	or zip code?	
3. How old are you?			
Under 25 years	☐ 35 - 44 years	55 - 64 years	75 years or older
25 - 34 years	45 - 54 years	65 - 74 years	
4. Are you currently a:			
Canadian citizen	Landed immigrant/ permanent resident	Other, specify	
5. Do you currently hold a valid Canadian passport?			
Yes	□ No		

6. How often do you travel outside the country?				
Once a year Two or three times a year	☐ More than three times a year ☐ Never or rarely			
7. What is your main travel destination?				
8. Approximate annual HOUSEHOLD income	e from all sources, before taxes and deductions?			
☐ Under \$20,000	\$80,000 to just under \$100,000			
□ \$20,000 to just under \$40,000	\$100,000 to just under \$150,000			
☐ \$40,000 to just under \$60,000	Over \$150,000			
□ \$60,000 to just under \$80,000				
9. Gender:				
☐ Male ☐ Female				
10. How did you hear about these consultations	s?			

Part 2 – Questions 11 to 15 are your chance to tell us what you think.
11. How did you submit your last passport application?
☐ In person ☐ By mail ☐ I don't have a passport
12. You can submit a passport application in person at one of our 34 regional offices or at the approximately 315 offices of our partners in Canada and abroad. You can also opt to mail in a passport application. Do you have any suggestions for improving this service network?
13. Passports are not paid for by Canadian tax dollars. This is because Passport Canada operates on a cost-recovery basis, which means that only Canadians who apply for a passport pay for this service. If Passport Canada's expenses increase (for instance, when security features are added), passport fees must also go up. Do you have any suggestions or ideas that would help Passport Canada keep the price of the passport as low as possible?
14. The Canadian passport is the most reliable travel document for Canadian citizens and the only proof of your nationality and identity that is accepted in all countries. The introduction of the more secure ePassport and other security enhancements will provide greater protection against tampering and reduce the risk of fraud. Is there anything else that Passport Canada could do to improve the Canadian passport?
15. Do you have any other suggestions for improving Passport Canada's operations, services and turnaround times?

Passport Canada is committed to open and transparent consultations. Your answers will be summarized in a report, and so cannot be considered confidential. However, if you have answered the questionnaire and do not represent a business, group or organization, your name will be protected pursuant to the *Access to Information Act* and the *Privacy Act*.

#### Glossary

**Automated Border Control System:** A fully automated system that authenticates the ePassport, establishes that the person presenting the passport is the rightful holder of the document, queries border control records, and automatically determines eligibility for border crossing according to predefined rules.

**Biometric:** A measurable physical characteristic or personal behavioural trait used to recognize the identity, or verify the claimed identity of, an enrolled individual.

**Canadian Passport Order:** Enacted in 1981, the Canadian Passport Order provides the legal framework for the production and issuance of passports in Canada.

**Consular service fee:** The consular service fee was implemented to help maintain and improve the consular services that the Canadian government makes available to Canadians living, working and travelling abroad. It makes up \$25 of the adult passport fee.

**Digital signature:** Canada's ePassports will contain a digital signature that is unique to the Canadian government. If something is wrong with this signature, it shows that the passport is not authentic. The technology used to sign and verify the data on the chip is called Public Key Infrastructure (PKI). This is an internationally-recognized way to encrypt data, commonly used in credit cards and other secure documents using electronic chips.

**Diplomatic passports:** Passport Canada issues diplomatic passports to Canadian government officials and diplomats, as well as representatives and delegates of the Government of Canada participating in international governmental organizations and international conferences of a diplomatic nature.

**Enhanced driver's license (EDL):** An EDL is a secure driver's license that includes a person's identity and citizenship and is issued by some Canadian provinces and US states. Its purpose is to provide Canadian and American citizens with a convenient option that allows for spontaneous travel across the Canada-US border.

Facial recognition technology: Facial recognition means identifying a person using their facial characteristics by digitally comparing two or more photos. Each photo goes through an electronic scanning process to locate landmarks on the person's face, such as the eyes, nose and mouth. The system then generates a facial template that can be used to compare one photo against another. Instead of relying solely on human judgment when comparing photos, facial recognition is a way of comparing photos objectively, using a scale to show the likelihood of a match or non-match.

**ePassport:** The ePassport consists of a paper passport book that includes an electronic chip securely encoded with the identifying information found on the passport's data page, as well as a biometric identifier. In the case of the Canadian ePassport, the only biometric identifier is the passport holder's photo.

**Guarantor:** The guarantor assists in confirming the identity of a passport applicant by signing the declaration of guarantor on the application form and the back of one photograph. If applicable, the guarantor signs and dates photocopies of supplementary identification that is submitted with the application to indicate the originals have been seen. The guarantor also serves as a point of departure for possible investigation of statements made on the passport application form.

**Integrity:** The integrity of the passport, in the context of travel document security, is the assurance that the passport has been issued to its rightful bearer.

International Civil Aviation Organization (ICAO): The International Civil Aviation Organization is a specialized agency of the United Nations. It was created in 1944 to promote the safe and orderly development of civil aviation worldwide. Headquartered in Montréal, ICAO develops international air transport standards and regulations and serves as the medium for cooperation in all fields of civil aviation among its 190 Member States.

**Legislative appropriations:** The funding of federal departments and agencies through public funds collected through taxes, as opposed to funds collected through user fees.

Machine-readable zone (MRZ): The last two lines at the bottom of page 2 of the passport form the machine-readable zone, which repeats the bearer's personal information and passport details in a format that can be read by a passport reader.

**NEXUS card:** A NEXUS card is a travel document designed to expedite the border clearance process for low-risk, pre-approved travellers into Canada and the United States. Those approved to participate in NEXUS receive a membership identification card to use when crossing between these two countries at designated NEXUS air, land and marine ports of entry.

**Passport card:** In the US, a passport card is a travel document that can only be used at US land border crossings. It offers expedited border crossing through the use of vicinity chip technology. Canada does not issue passport cards.

**Proximity chip:** A proximity contactless chip, such as the one found in the ePassport, ensures that the chip can only be read when held at very close range to a reader. The Canadian ePassport must be held within 10 centimetres of an ePassport reader in order to be read.

**Public Key Directory (PKD):** The International Civil Aviation Organization (ICAO) has created a system to facilitate the exchange of passport-related information between participating countries. Called the ICAO Public Key Directory (PKD), it is a repository where participating countries, like Canada, deposit the data other countries need to ensure ePassports are authentic. The ICAO PKD does not contain any personal information about any passport holder. It only contains information to confirm that the ePassport has been issued by a bona fide authority and that it has not been tampered with.

**Special passport:** Passport Canada issues special passports to persons holding office, such as members of Parliament, senators, members of provincial cabinets, and to persons employed by the Government of Canada in a non-diplomatic capacity travelling on an official mission or to a post abroad.

**Vicinity chip:** Commonly used in enhanced driver's licenses, vicinity chip technology allows for the data found on the electronic chip to be read from a medium to long distance. The ePassport, on the other hand, contains a proximity chip, which can only be read at close range.

*User Fees Act* (UFA): The *User Fees Act* is a law that sets out requirements for federal government departments that wish to adopt new service standards and associated fees. Its purpose is to ensure adequate scrutiny of changes to government services for which fees are charged.

Western Hemisphere Travel Initiative (WHTI): The Western Hemisphere Travel Initiative is a US law that requires all travellers, including Canadian and American citizens, to present a valid passport or other approved secure travel document when entering the US from within the western hemisphere.