

December 3, 2020

Chair David. B. Orsborn
Access to Information and Protection of Privacy Statutory Review 2020
3rd Floor, Beothuck Building
20 Crosbie Place
St. John's, NL
A1B 3Y8

Dear Chair, Orsborn:

On behalf of the Board of Directors of the Newfoundland and Labrador Employers' Council, thank you for the important work you are doing as part of our privacy legislation review. Access to information legislation is an essential part of our democracy, and we are pleased to offer our support and input.

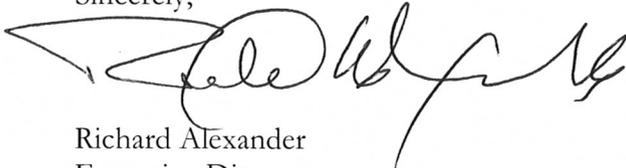
We utilize access to information requests only infrequently as part of our work as a business advocacy organization but are thankful and confident that when we make those requests government responds in a timely and accurate manner.

In our dealings with government and government departments, we consistently observe a lack of cost-benefit analysis surrounding decision making and departmental functioning. We believe there is an opportunity and a significant benefit to creating and enhancing a culture of cost-benefit analysis in all government operations, including efforts around access to information and privacy protection. We must be careful not to compromise the integrity of essential government operations, but there is a benefit to conducting cost-benefit analysis both in legislation and operations. Also, our provincial treasury's worsening and dire financial position should necessitate consideration of cost-benefit in all matters.

Therefore, we respectfully suggest including a cost-benefit consideration, if not considered already, in your review of our provincial access to information and privacy legislation.

Thank you for the opportunity to provide this submission, and we are more than happy to support you in any way appropriate.

Sincerely,



Richard Alexander
Executive Director