



Process for Making a Submission to Government

On occasion IPIC Committees will be responsible for drafting submissions on behalf of IPIC to the Government. Please draft your submissions as written from IPIC's perspective and for the intended audience to be the government (not as a report to the Board). Please prepare submissions in the form of stand-alone documents (as opposed to letters). Staff will prepare accompanying cover letters if required.

All submissions in response to consultations to CIPO or any other governing body are reviewed by the Board of Directors and are sent under the President and Chair of the Board's signature. Committees will be recognized for their work within the submission, in the IP Newsbreak and in the [submission database](#).

We recommend that the Chair organize a conference call with the Committee to discuss submissions, as experience has shown that this is the best way to get input from Committee members. The meeting can be planned to give enough notice for people to think about the issues and still leave adequate time for drafting a response. Chairs may wish to hold two calls: one to plan the division of the workload, and another to discuss the first draft and then make changes.

When beginning a project, some Chairs may find it helpful to first identify the key issues, while others will start by asking people to provide comments or divide tasks into Subcommittees. Get your Committee members involved: assign tasks, hold conference calls, and ask for comments.

All Committee members should have a chance to see the draft before it is sent to the Board of Directors. Chairs should make it clear that the review process is not a vote, but rather, an opportunity to discuss other points of view in order to ensure the submission is representative of the views of the members of IPIC.

The Board of Directors trusts Chairs to make final determinations if there are conflicting viewpoints: in some cases it may be more appropriate to take a unified stance, while in others, presenting multiple points of view may be the preferred choice. If there are conflicting views, Chairs must apprise the Board of Directors of this either within the submission itself or via e-mail to their Board Liaison or to the CEO.

Submissions should be sent in a Word format (permitting the Board of Directors to edit it) to the CEO and the Committee's Board Liaison when completed. Please refer to the IPIC submission style guide (found in this guidebook). For the Board consideration please include an executive summary or a list of recommendations at the top of the document where possible in government submissions and note whether any issues in the submission that were contentious



among the Committee during discussions, or if the Committee Chair felt may be contentious with the IPIC membership.

The Board Liaison or IPIC staff will send the final version of submissions to the Board of Directors. Please circulate the final versions with all Committee members. Chairs may also highlight the contributions of specific individuals if that is appropriate.



Checklists Making a Submission to Government

Before Starting a Review for Submission to Government Yes (✓) or No (✗)

1. Has permission been given from the Board of Directors or the CEO?	
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Preparing the Submission Yes (✓) or No (✗)

1. Has the Committee studied the relevant consultation documents (if applicable) as well as related regulations and laws in English and French and then determined an appropriate work plan?	
2. Has the Board Liaison member been copied on all correspondence?	
3. Has the final draft been submitted to the CEO?	
4. Have Committee members been asked whether there might be a potential conflict of interest?	
5. Were differing viewpoints addressed and discussed? If applicable, did the Committee consider comments received from other IPIC members?	
6. If anyone on the Committee has concerns about the government submission, have these been resolved through discussion with the Board Liaison and/or Staff Liaison/CEO?	

Content/Style Yes (✓) or No (✗)

1. Does the submission meet the formatting requirements outlined in the IPIC Style Guide?	
2. Have all case references and quotations been properly cited?	
3. Balance and Tone: Are the substantive points:	
• Technically accurate?	
• Intellectually honest?	
• Balanced and representative of members' views?	
• Practical to implement? Are alternatives presented?	



Submitting to the Board Yes (✓) or No (✗)

1. Has a “summary of recommendations” page (in the order the recommendations appear within the submission) been included as the first page after the Title Page on IPIC government submissions? (see example on pages 48-49)	
2. Has a very short (2-3 sentence) summary of the main concern the Committee wants addressed with the regulation been included?	
3. Are there any issues that were difficult to get a consensus among the Committee?	
<ul style="list-style-type: none">• If yes, very briefly (a few sentences) provide information important for the Board’s consideration in approving the submission.	
4. Are there any issues in the draft regulation or the resulting submission that the Committee feels could be contentious within the membership?	
<ul style="list-style-type: none">• If yes, very briefly (a few sentences) provide information important for the Board’s consideration in approving the submission.	

NOTE: If the response to any of the above is "no," Committee Chairs must discuss the potential issue(s) with the Committee’s Board Liaison or the CEO.