



Robson Inc. Response to ISED's 30-Day National Sprint Consultation on Artificial Intelligence (AI) Strategy

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Submission to
Innovation, Science and Economic Development Canada
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From
The Board of Directors and Founders of Robson Inc.

October 28, 2025

Executive Summary

There is an imbalance between legislature, practice, and service; Canadians demand a sovereign, trusted, government-endorsed artificial intelligence platform – a standardized instrument for regulatory compliance. Citizens expect their government to enforce ethics and accessibility by design¹ by transitioning voluntary guidance to a programmatic guardrail for policy frameworks; redressing information asymmetries² as a supplementary norm³.

This submission addresses objectives of ISED and the AI task force with a unique strategy. **Robson Inc.**, as a 100% Indigenous-owned CCIB⁴-certified Canadian technology company, champions multilateral Indigenous technological investment, development and self-determination in mission-critical industries such as defence and security. Robson's **Emily AI OS (Artificial Intelligence Operating System)**, our Platform, acts as a central, national guardrail – a secure, ecological, regulatory Indigenous agent for automatic policy adherence. Guided by FNIGC⁵-OCAP^{®6} principles, duty-to-consult legislature⁷, and the 5Rs⁸; we urge sanctioned programmatic and instrumental procurement⁹ of such Platforms for national regulatory compliance, privacy, provenance, and energy stewardship in all Canadian owned and operated AI platforms on national soil – a binding blueprint as defensible national sovereign infrastructure.

With a low size, weight, and power (SWaP) solution, Robson is guided by Canadian policy, legislature, and global tools. We enforce a high standard of Canada's research and development, talent, adoption, commercialization, scaling, trust and safety, education, skills, infrastructure, and security. Our response herein provisions insightful socioeconomic and ecological solutions, privacy and consent controls, lawful trade techniques, data provenance procedures, multilingual and multicultural practices, systems for intelligence surveillance & reconnaissance, scientific & earth observation methods, and scalable upskill incentives.

We must champion safe, resilient growth as a true north ancestral tradecraft for the benefit of all Canadians and stand on-guard for a strong and united One Canadian Economy¹⁰.

¹ dellson@cna-rcor.ca. "Poll Suggests 85% of Canadians Want Governments to Regulate AI - CNAR-RCOR." *CNAR-RCOR*, 28 Aug. 2025, cna-rcor.ca/poll-suggests-85-of-canadians-want-governments-to-regulate-ai. Accessed 12 Oct. 2025.

² Government of Canada (2020). Canada's Communication Future: Time To Act. Final Report (January). Innovation, Science and Economic Development Canada. <https://ised-isde.canada.ca/site/broadcasting-telecommunications-legislative-review/en/canadas-communications-future-time-act>. Accessed October 11, 2025.

³ Canada. "2.2 Complementing the Legal Instrument - 2. Policy Instruments: An Inventory (Continued) - "There Ought to Be a Law!" - Instrument Choice: An Overview of the Issues." *Justice.gc.ca*, 2022, www.justice.gc.ca/eng/rp-pr/csj-sjc/jsp-sjp/rp02_10-dr02_10/p2_1.html. Accessed 12 Oct. 2025.

⁴ Canadian Council for Indigenous Business. www.ccib.ca, 21 Aug. 2025.

⁵ "Home." *The First Nations Information Governance Centre*, fnigc.ca.

⁶ First Nations principles of ownership, control, access, and possession

⁷ Canada. "Duty to Consult and Accommodate." *Justice.gc.ca*, 2017, www.justice.gc.ca/eng/csj-sjc/jir-dja/35pedia-wiki35/p8.html.

⁸ Relationality, Reciprocity, Responsibility, Relevance, Resources. See "The 5 Rs of Indigenous Engagement – Indigenous Engagement Institute." *Indigenengage.com*, 2 Aug. 2024, indigenengage.com/the-5-rs-of-indigenous-engagement. Accessed 12 Oct. 2025.

⁹ Canada; "Transformative Indigenous Procurement Strategy: Dialogue with Indigenous Partners." *Sac-Isa.gc.ca*, 2022, www.sac-isc.gc.ca/eng/1691787188695/1691787230531.

¹⁰ Intergovernmental Affairs. "Implementation of Bill C-5: One Canadian Economy." *Canada.ca*, Government of Canada, 26 June 2025, www.canada.ca/en/intergovernmental-affairs/news/2025/06/implementation-of-bill-c-5-one-canadian-economy.html.

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Table 1

Acts, policies, and departments of concern to AI Task Force themes. This submission and its strategies entail systematic and programmatic consideration of these references, among others.

Focus Area	Acts	Policy	Dept. / Organization
Research & Talent	• Official Languages • Canadian Human Rights	• Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans 2	• Social Sciences and Humanities Research • Employment and Social Development
Industry & Government Adoption	• Department of Industry • Statistics • Impact Assessment	• Planning and Management of Investments • Strategic Partnerships Initiative	• Office of the Superintendent of Financial Institutions • Environment & Climate Change • Shared Services
Commercialization	• Financial Administration • Canadian Commercial Corporation • Trademarks • College of Patent Agents and Trademark Agents	• Policy on Title to Intellectual Property Arising Under Crown Procurement Contracts	• Immigration, Refugees and Citizenship Canada • Export Development Canada • Canadian Commercial Corporation • Global Affairs Canada
Scaling Champions, Attracting Investments	• Canada Innovation Corporation	• Framework for the Management of Risk	• Treasury Board Secretariat
Safety & Trust	• Trademarks • Constitution S. 35 • United Nations Declaration on the Rights of Indigenous Peoples / C-15	• Policy on Service and Digital • Policy on Communications and Federal Identity • Policy on Access to Information	• Office of the Privacy Commissioner • Indigenous Services Canada
Education & Skills	• Accessible Canada Act	• Policy on People Management	• Employment and Social Development Canada • Accessibility Standards Canada
Enabling Infrastructure	• Greenhouse Gas Pollution Pricing Act • Federal Sustainable Development Act	• Policy on Green Procurement • Policy on Results	• Crown-Indigenous Relations and Northern Affairs Canada
Security & Capacity	• Communications Security Establishment Act • Critical Cyber Systems Protection Act • Department of Public Safety and Emergency Preparedness • Emergency Management • Proceeds of Crime (Money Laundering) and Terrorist Financing	• Policy on Government Security	• Financial Administration • Department of National Defence • Public Safety Canada • Communications Security Establishment • Royal Canadian Mounted Police • Canadian Security Intelligence Service

Research and Talent

How does Canada retain and grow its AI research edge? What are the promising areas that Canada should lean in on, where it can lead the world?

Canada retains and expands its AI research edge by anchoring policy and practice with academically multicultural knowledge, skills, and abilities – inscribed in our rights¹¹, data sovereignty¹², ethical research¹³, multilingualism¹⁴, accessibility¹⁵, and ecology¹⁶. Our nation must promote a labour force that is highly skilled¹⁷ by doubling down on research and investment to fight a decades-long underproductive slump¹⁸. This report identifies physical¹⁹ and metaphysical²⁰ scientific²¹, climate²² and space²³ programs for wildfire²⁴, biodiversity²⁵, water stewardship²⁶, climate change²⁷, linguistics²⁸, social sciences²⁹, defence³⁰ and security³¹ as areas aligned to national need and global demand, and where Indigenous knowledge is paramount³².

If government cannot keep up with AI legislature, it must at least uphold its duty to care for its people.

11 Branch, Legislative Services. “Consolidated Federal Laws of Canada, United Nations Declaration on the Rights of Indigenous Peoples Act.” www.laws-lois.justice.gc.ca, 21 June 2021, www.laws-lois.justice.gc.ca/eng/acts/u-2.2/page-1.html.

12 First Nations Information Governance Centre. “The First Nations Principles of OCAP®.” The First Nations Information Governance Centre, 2024, fnigc.ca/ocap-training.

13 Government of Canada. “Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans – TCPS 2 (2022) – Chapter 9: Research Involving the First Nations, Inuit, and Métis Peoples of Canada.” Ethics.gc.ca, 11 Jan. 2023, ethics.gc.ca/eng/tcps2-cpts2_2022_chapter9-chapitre9.html.

14 English/French & Indigenous Languages (See Branch, Legislative Services. “Consolidated Federal Laws of Canada, Official Languages Act.” [Laws-Lois.justice.gc.ca](http://www.laws-lois.justice.gc.ca), 21 Sept. 2017, [laws-lois.justice.gc.ca/eng/acts/o-3.01/page-1.html](http://www.laws-lois.justice.gc.ca/eng/acts/o-3.01/page-1.html)).

15 Branch, Legislative Services. “Consolidated Federal Laws of Canada, Accessible Canada Act.” [Laws-Lois.justice.gc.ca](http://www.laws-lois.justice.gc.ca), 11 July 2019, [laws-lois.justice.gc.ca/eng/acts/a-0.6/page-1.html](http://www.laws-lois.justice.gc.ca/eng/acts/a-0.6/page-1.html).

16 Defence, National. “Opening Words and Land Acknowledgement.” www.canada.ca, 25 Apr. 2022, www.canada.ca/en/department-national-defence/corporate/reports-publications/mnd-advisory-panel-systemic-racism-discrimination-final-report-jan-2022/opening-words-and-land-acknowledgement.html.

17 Government Of Canada. “Employment and Social Development Canada - Canada.ca.” Canada.ca, 2023, www.canada.ca/en/employment-social-development.html.

18 Conference Board of Canada, The, 2024 Innovation Report Card

19 Government of Canada, Innovation. “National Quantum Strategy - Home.” Ised-Isde.canada.ca, 31 July 2023, ised-isde.canada.ca/site/national-quantum-strategy/en.

20 Council, Research. “NRC Metrology Makes Time and Builds Atomic Fountain Clock - National Research Council Canada.” Canada.ca, 23 July 2020, nrc.canada.ca/en/stories/nrc-metrology-makes-time-builds-atomic-fountain-clock. Accessed 10 Oct. 2025.

21 CIFAR (“Home.” [CIFAR](http://CIFAR.com), cifar.ca/) and VECTOR INSTITUTE (“Vector Institute for Artificial Intelligence |.” Vectorinstitute.ai, 19 Aug. 2019, vectorinstitute.ai.)

22 MILA (“Environment and Energy | Mila.” Mila.quebec, 2025, mila.quebec/en/research/strategic-priorities/environment-and-energy. Accessed 11 Oct. 2025.)

23 Agency, Canadian Space. “Home.” www.asc-csa.gc.ca, 29 Feb. 2012, www.asc-csa.gc.ca/eng.

24 Canada, Natural Resources. “Revolutionizing Emergency Preparedness with On-Demand Mapping - Natural Resources Canada.” Canada.ca, 2024, natural-resources.canada.ca/stories/simply-science/revolutionizing-emergency-preparedness-demand-mapping.

25 “Towards a National Digital Platform for Biodiversity Conservation: Data Repository and Artificial Intelligence Enabled Analytics.” Science.gc.ca, 29 Apr. 2025, science.gc.ca/site/science/en/office-chief-science-advisor/science-advice-support-canadas-national-biodiversity-strategy/data-ai-biodiversity-report. Accessed 11 Oct. 2025.

26 Canada Water Agency. “National Freshwater Data Strategy - Canada.ca.” Canada.ca, 2023, www.canada.ca/en/canada-water-agency/data-collaboration/national-freshwater-data-strategy.html. Accessed 11 Oct. 2025.

27 Treasury Board of Canada Secretariat. “Greening Government Strategy.” Aem, 19 Dec. 2017, www.canada.ca/en/treasury-board-secretariat/services/innovation/greening-government/strategy.html.

28 “Commissariat Aux Langues Officielles Du Canada / Office of the Commissioner of Official Languages of Canada.” Clo-Ocol.gc.ca, 2025, www.clo-ocol.gc.ca/index.html. Accessed 9 Oct. 2025.

29 and, Sciences. “Social Sciences and Humanities Research Council.” Canada.ca, 2025, sshrc-crsh.canada.ca/en/about-sshrc/programs-priorities-initiatives/insight-research.aspx. Accessed 11 Oct. 2025.

30 Defence Research and Development Canada. “Defence and Security Science & Technology Strategy - Canada.ca.” Canada.ca, 2011, www.canada.ca/en/defence-research-development/corporate/publications/defence-st-strategy.html.

31 “Communications Security Establishment.” Cse-Cst.gc.ca, 2018, www.cse-cst.gc.ca/en.

32 National Defence. “Braiding Indigenous and Western Knowledge.” Canada.ca, 2025, www.canada.ca/en/department-national-defence/maple-leaf/defence/2025/10/braiding-indigenous-western-knowledge.html. Accessed 11 Oct. 2025.

How can Canada strengthen coordination across academia, industry, government and defence to accelerate impactful AI research?

The root cause of Canada's AI performance gap lies in programmatic, cross-domain interfacing. We must openly enforce policy³³ with a novel **Accessible**³⁴ **Instrument**³⁵; provisioning sanctioned interfaces for impact-assessments³⁶ and government decision-making³⁷. This instrument will be an application to programmatically interface governance using artificial intelligence. We believe Robson's Platform, as an instrument, upholds lawful and socioeconomic duty³⁸ to policy, and shall serve as a robust, logical interface for users, programs, and agents. Its function as a blueprint for using the Canadian matrix of instruments³⁹ must harness ground-truth mechanisms for distributed, coordinated, reasoning systems for guarding automated logistics within Canadian scientific and legislative frameworks. Government data services such as GCXchange⁴⁰ and ESDC⁴¹ – along with academic institutions, industry, and defence – must coordinate in consulting such a Platform using, for instance, a prescribed AI Development Kit for nationally sanctioned Quality Assurance (QA) and conformance.

What conditions are needed to ensure Canadian AI research remains globally competitive and ethically grounded?

Canada's source of strength⁴² lies in developing international behavioural and technical competencies⁴³ with diversity and inclusion. We, as a nation, have a legal and moral commitment⁴⁴ to globally champion harmonious multicultural integration. Thus, government must, conditionally, ensure AI procurement⁴⁵ and pilot programs uphold dutifully⁴⁶ guarded

³³ Board, Treasury. "Commitment 20: Enable Open Dialogue and Open Policy Making | Open Government - Government of Canada." *Canada.ca*, 2018, open.canada.ca/en/commitment-20-enable-open-dialogue-and-open-policy-making. Accessed 11 Oct. 2025.

³⁴ "CAN-ASC-3.1:2025 – Plain Language - Accessibility Standards Canada." *Canada.ca*, 2025, accessible.canada.ca/creating-accessibility-standards/can-asc-312025-plain-language. Accessed 14 Oct. 2025.

³⁵ Canada. "2. Policy Instruments: An Inventory - "There Ought to Be a Law!" - Instrument Choice: An Overview of the Issues." *Justice.gc.ca*, 2022, www.justice.gc.ca/eng/rp-pr/csj-sjc/jsp-sjp/rp02_10-dr02_10/p2.html#section2. Accessed 11 Oct. 2025.

³⁶ Algorithmic Impact Assessment (AIA). See Treasury Board of Canada. "Algorithmic Impact Assessment Tool." *Www.canada.ca*, 22 Mar. 2021, www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsible-use-ai/algorithmic-impact-assessment.html.

³⁷ Government of Canada. "Directive on Automated Decision-Making." *Www.tbs-sct.canada.ca*, 5 Feb. 2019, www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32592.

³⁸ Government of Canada. "Government of Canada and the Duty to Consult." *Www.rcaanc-Cirnac.gc.ca*, 15 Mar. 2012, www.rcaanc-cirnac.gc.ca/eng/1331832510888/1609421255810.

³⁹ Canada. "2.2 Complementing the Legal Instrument - 2. Policy Instruments: An Inventory (Continued) - "There Ought to Be a Law!" - Instrument Choice: An Overview of the Issues." *Justice.gc.ca*, 2022, www.justice.gc.ca/eng/rp-pr/csj-sjc/jsp-sjp/rp02_10-dr02_10/p2_1.html.

⁴⁰ Board, Treasury. "Collaborate Widely - Canada.ca." *Canada.ca*, 2025, www.canada.ca/en/government/system/digital-government/canada-digital-standards/collaborate-widely.html. Accessed 11 Oct. 2025.

⁴¹ "Best Practices, ESDC Processes and Guides." *ESDC Development Community*, 2025, esdc-devcop.github.io/guides. Accessed 12 Oct. 2025.

⁴² Global Affairs Canada. "Inclusion and Respect for Diversity." *GAC*, 14 Sept. 2022, www.international.gc.ca/world-monde/issuues_developpement-enjeux_developpement/human_rights-droits_homme/inclusion_respect.aspx?lang=eng.

⁴³ and, Refugees. "IRCC Behavioural and Technical Competency Dictionary - Canada.ca." *Canada.ca*, 2025, www.canada.ca/en/immigration-refugees-citizenship/corporate/careers/job-opportunities/competency-dictionary.html#af.

⁴⁴ Government of Canada. "Implementing the United Nations Declaration on the Rights of Indigenous Peoples in Canada." *Wwww.justice.gc.ca*, 20 July 2023, www.justice.gc.ca/eng/declaration/index.html.

⁴⁵ Canada; "Transformative Indigenous Procurement Strategy: Dialogue with Indigenous Partners." *Sac-Isa.gc.ca*, 2022, www.sac-isa.gc.ca/eng/1691787188695/1691787230531. Accessed 10 Oct. 2025.

⁴⁶ Government of Canada. "Government of Canada and the Duty to Consult." *Wwww.rcaanc-Cirnac.gc.ca*, 15 Mar. 2012, www.rcaanc-cirnac.gc.ca/eng/1331832510888/1609421255810.

policy and Indigenous governance⁴⁷, in line with OCAP[®]⁴⁸ and ethical conduct⁴⁹. Without this, “extractivist” AI⁵⁰ threatens Indigenous data sovereignty, self-determination⁵¹, and quality of life⁵². 5% Indigenous Procurement Strategy exceptions exist – until 2029 – in departments concerning Science & Innovation, Defence, Law, and Information Technology (IT). These total \$40 billion dollars⁵³, with Health Canada, the Treasury Board Secretariat, and the Registrar of the Supreme Court of Canada falling short of Indigenous procurement in 2026 by \$5 million.

What efforts are needed to attract, develop and retain top AI talent across research, industry and the public sector?

As a talent flywheel, the Canadian government must continue funding from ISET⁵⁴ in training, DRDC⁵⁵/NSERC Alliance⁵⁶ in research and development, Mitacs⁵⁷ for internships, and layer SR&ED⁵⁸ with CIC⁵⁹/IRAP⁶⁰ for small and medium-sized business projects. Concordantly, funding⁶¹ multiple Robson-led, on-reserve Emily AI OS Academies and cohorts at Indigenous-led facilities, in concert with the logic model of CIFAR⁶² and strategic partnerships initiative⁶³, will foster First Nations technology and instrumentation. Accessible intelligent physical and metaphysical systems – integration and observation of the elements and peoples – is our true north **ancestral tradecraft**.

⁴⁷ “Online Library - the First Nations Information Governance Centre.” The First Nations Information Governance Centre, 16 Nov. 2020, fnigc.ca/online-library.

⁴⁸ Ownership, Control, Access, Possession. See: First Nations Information Governance Centre. “The First Nations Principles of OCAP[®].” The First Nations Information Governance Centre, 2024, fnigc.ca/ocap-training.

⁴⁹ Government of Canada. “Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans – TCPS 2 (2022).” Ethics.gc.ca, Government of Canada, 2022, ethics.gc.ca/eng/policy-politique_tcps2-eptc2_2022.html.

⁵⁰ “Indigenous Data Stewardship Stands against Extractivist AI.” Ubctoday.ubc.ca, 2024, ubctoday.ubc.ca/news/june-06-2024/indigenous-data-stewardship-stands-against-extractivist-ai.

⁵¹ “AI Threatens Indigenous Data Sovereignty and Digital Self-Determination.” Policy Options, 22 May 2025, policyoptions.irpp.org/2025/05/ai-indigenous-data.

⁵² Canada. “Quality of Life Indicator: Indigenous Self-Determination.” Statcan.gc.ca, 2022, www.statcan.gc.ca/hub/carrefour/quality-life-qualite-vie/good-governance-saine-gouvernance/indigenous-self-determination-autodetermination-autochtones-eng.htm.

⁵³ Ibid

⁵⁴ Canada, Service. “About the Indigenous Skills and Employment Training Program.” Aem, 23 Oct. 2015, www.canada.ca/en/employment-social-development/programs/indigenous-skills-employment-training.html.

⁵⁵ Canada, Service. “Defense Research and Development Canada.” Aem, 23 Oct. 2015, www.canada.ca/en/defense-research-development.html.

⁵⁶ Canada. “NSERC - Innovate - Alliance.” Natural Sciences and Engineering Research Council of Canada (NSERC), 2025, www.nserc-crsng.gc.ca/Innovate-Innover/Alliance-Alliance_eng.asp. Accessed 11 Oct. 2025.

⁵⁷ “Mitacs: Bringing Innovation into Reach - Mitacs.” Mitacs, 11 Dec. 2024, www.mitacs.ca.

⁵⁸ Canada Revenue Agency. “Scientific Research and Experimental Development Tax Incentive Program - Canada.ca.” Canada.ca, 2017, www.canada.ca/en/revenue-agency/services/scientific-research-experimental-development-tax-incentive-program.html.

⁵⁹ Canada, Department of Finance. “A Blueprint for the Canada Innovation Corporation.” Www.canada.ca, 16 Feb. 2023, www.canada.ca/en/department-finance/services/publications/canada-innovation-corporation-blueprint.html.

⁶⁰ Canada, National Research Council. “Support for Technology Innovation.” Nrc.canada.ca, 4 Mar. 2019, nrc.canada.ca/en/support-technology-innovation.

⁶¹ Branch, Legislative Services. “First Nations Fiscal Management Act.” Justice.gc.ca, 2025, laws-lois.justice.gc.ca/eng/acts/f-11.67/page-3.html#h-225127.

⁶² “Evaluation of Innovation, Science and Economic Development (ISED) Canada Funding to CIFAR.” Appendix A. Canada.ca, 14 Sept. 2022, ised-isde.canada.ca/site/audits-evaluations/en/evaluation/evaluation-innovation-science-and-economic-development-ised-canada-funding-cifar.

⁶³ Canada, Government of Canada; Indigenous Services. “Strategic Partnerships Initiative.” Www.isc-Sac.gc.ca, 23 Feb. 2012, www.isc-sac.gc.ca/eng/1330016561558/1594122175203.

AI Adoption Across Industry and Governments

Where is the greatest potential for impactful AI adoption in Canada? How can we ensure those sectors with the greatest opportunity can take advantage?

This report prioritizes national security and defence of our socioeconomic well-being; Robson is committed to just rulings for Indigenous long-term predictable funding⁶⁴. Economic contraction⁶⁵ and slashes to operational expenditures⁶⁶ risk a lapse in operational governance⁶⁷; threatening Canadian sovereignty with cuts to ISC⁶⁸ of more than 50% from 2023-2028⁶⁹. Given this financial climate; in qualitative terms, Robson's assessment hereby addresses more than half of the key OSFI⁷⁰ "Areas of Risk" for 2025 to: climate, digital governance, cyber, and foreign interference... aside from key areas of: real estate⁷¹, lending and credit, funding and liquidity. We understand an intelligent, automated blueprint to grow operational capacity and reduce risk will mitigate the potential of amplified perils to banks and funding; however, while financial risks are measurable in dollars – risks to our peoples' sovereignty is not.

Climate change is also an unsettling and invaluable risk to First Nations culture⁷². Canada's industry must reconcile⁷³ in earnest with green programs⁷⁴ and emissions reductions⁷⁵ or risk another most-destructive season⁷⁶, costing billions of dollars per year of insured losses⁷⁷. To this effect, Robson exposes per-job energy/CO₂ and water-use telemetry for indigenous environmental impact checks, using net-zero/low-water data centres⁷⁸: a prerequisite for ancestral and First Nations ecological review processes⁷⁹ or impact assessments⁸⁰ requiring greenhouse gas and water usage measurements, and carbon awareness tools for AI workloads.

⁶⁴ Canada. "First Nations Priorities Chapter." Justice.gc.ca, 2025, www.justice.gc.ca/eng/csj-sjc/tjr-dja/tjs-sja/tjs-lsja/p5.html. Accessed 14 Oct. 2025.

⁶⁵ "The Main Street Quarterly, 2025 Q1." Cfib-Fcei.ca, 24 Apr. 2025, www.cfib-fcei.ca/en/research-economic-analysis/main-street-quarterly.

⁶⁶ "Prime Minister Carney Announces New Measures to Lower Costs for Canadians and Help You Get Ahead." Prime Minister of Canada, 2025, www.pm.gc.ca/en/news/news-releases/2025/10/10/prime-minister-carney-announces-new-measures-lower-costs. Accessed 14 Oct. 2025.

⁶⁷ Office. "OSFI's Annual Risk Outlook – Fiscal Year 2025-2026 - Office of the Superintendent of Financial Institutions." Osfi-Bsif.gc.ca, 13 Mar. 2025, www.osfi-bsif.gc.ca/en/about-osfi/reports-publications/osfi-annual-risk-outlook-fiscal-year-2025-2026.

⁶⁸ Canada, Government of Canada; Indigenous Services. "Environment and Natural Resources." Ww.sac-Isc.gc.ca, 3 Nov. 2008, www.sac-isc.gc.ca/eng/1100100034243/1612298633640.

⁶⁹ Canada; "Indigenous Services Canada: 2025-26 Departmental Plan." Sac-Isc.gc.ca, 2025, www.sac-isc.gc.ca/eng/1731612400516/1731612419549#s3. Accessed 14 Oct. 2025.

⁷⁰ Institutions, Office of the Superintendent of Financial. "Homepage." Ww.osfi-Bsif.gc.ca, 19 Jan. 2024, www.osfi-bsif.gc.ca/en.

⁷¹ Robson recognizes that AI can assist with a "streamlined process to access First Nation housing program funding" – see <https://www.ourcommons.ca/Content/Committee/441/PACP/WebDoc/WD11472270/PACP-Sessional-ActionPlans/2024-OAG/Rpt02/DepartmentofIndigenousServices-e.pdf>

⁷² Canada, Natural Resources. "Government of Canada Releases New Report Showing the Impacts of Climate Change and Necessity of Indigenous-Led Climate Change Adaptation." Ww.canada.ca, 7 May 2024, www.canada.ca/en/natural-resources-canada/news/2024/05/government-of-canada-releases-new-report-showing-the-impacts-of-climate-change-and-necessity-of-indigenous-led-climate-change-adaptation.html.

⁷³ Government of Canada. "Delivering on Truth and Reconciliation Commission Calls to Action." Rcaanc-Cirnac.gc.ca, 10 July 2023, www.rcaanc-cirnac.gc.ca/eng/1524494530110/1557511412801.

⁷⁴ Canada, Environment and Climate Change. "Indigenous Climate Funding." Ww.canada.ca, 19 Jan. 2022, www.canada.ca/en/environment-climate-change/services/climate-change/indigenous-partnership/funding.html.

⁷⁵ Government of Canada. "Canadian Net-Zero Emissions Accountability Act." Government of Canada, 25 Feb. 2021, www.canada.ca/en/services/environment/weather/climatechange/climate-plan/net-zero-emissions-2050/canadian-net-zero-emissions-accountability-act.html.

⁷⁶ "Summer 2024 Shatters Records for Severe Weather Damage: Over \$7 Billion in Insured Losses from Floods, Fires and Hailstorms." Ww.abc.ca, 2024, www.abc.ca/news-insights/news/summer-2024-shatters-records-for-severe-weather-damage-over-7-billion-in-insured-losses-from-floods-fires-and-hailstorms.

⁷⁷ "Canadian Governments Need to Emphasize Climate Defence over Offence for the Rest of This Decade." Ww.abc.ca, 2022, www.abc.ca/news-insights/in-focus/canadian-governments-need-to-emphasize-climate-defence-over-offence-for-the-rest-of-this-decade. Accessed 11 Oct. 2025.

⁷⁸ Canada, Shared Services. "Enterprise Data Centres - Canada.ca." Canada.ca, 2024, www.canada.ca/en/shared-services/corporate/hosting-services/data-centres/cdc-cde.html. Accessed 11 Oct. 2025.

⁷⁹ Canada, Government of Canada; Indigenous Services. "Environmental Review Process for Projects on Reserve Land." Ww.sac-Isc.gc.ca, 16 Aug. 2012, www.sac-isc.gc.ca/eng/1345141628060/1612813855724.

⁸⁰ Branch, Legislative Services. "Impact Assessment Act." Justice.gc.ca, 2019, laws.justice.gc.ca/eng/acts/i-2.75/page-2.html#h-1160193. Accessed 11 Oct. 2025.

Digital governance incurs shocking emissions⁸¹, and e-waste⁸²; Canada must prioritize requiring low SWaP⁸³ tactical AI models and train Indigenous IT experts⁸⁴ to use strictly ecological AI systems. Particularly impactful adoption is in organizational uptake, where 1%⁸⁵ of First Nations economic development corporations use AI, versus the national standard of 12.2%⁸⁶. We challenge corporations to identify a feasible twelvefold uptake where “green by default” is feasible.

Cyber resilience and foreign interference can be mitigated with guidance from multiple departments such as the CSE⁸⁷, DND⁸⁸, CSIS⁸⁹, RCMP⁹⁰ and GAC⁹¹, with strict adherence to upholding their strategies, policies⁹², frameworks, directives, and guidelines. Robson ensures its defence value proposition is in-line with these commitments to Canadians in sovereign data security and compliance, high performance computing for defence and aerospace, cloud & data capabilities, and AI innovation for defence applications.

What are the key barriers to AI adoption, and how can government and industry work together to accelerate responsible uptake?

Hurdles to adoption concern the misalignment of policy and practice – AI systems are not trusted by Canadians⁹³, moreover, Canadian evaluative strategy does not have consistent and automatic quality assurance. For instance, the Competition Bureau’s “logic model” is a triangular graphic⁹⁴ and is inconsistent with the Central Agencies Portfolio Logic Model⁹⁵. Department-centric assessment criteria⁹⁶ is exacted in waterfall-style, linear sequence on a prescribed “single page”⁹⁷ without consistent, agile, interim acid testing. Our government must move to instrumentally effect a temporal, logic-based calculus of events⁹⁸ in a type of Temporal Logic Model⁹⁹ that will interface programmatic, accessible,

⁸¹ Akadiri, S. S. and Kirikkaleli, D., “Does artificial intelligence investment matter for the quality of the environment in Canada?”, International Journal of Environmental Science and Technology, Springer, 2025. doi:10.1007/s13762-025-06701-0.

⁸² and, Employment. “Foresight on AI: Policy Considerations.” Canada.ca, 2025,

horizons.service.canada.ca/en/2025/02/10/ai-policy-consideration/index.shtml#_Insight_11. Accessed 11 Oct. 2025.

⁸³ Canadian Space Agency. “Funding for Space Research and Development.” Canadian Space Agency, 2024.

www.asc-csa.gc.ca/eng/funding-programs/programs/stdp/contributions-awarded-under-the-stdp-ao-8.asp.

⁸⁴ “GC Digital Talent | Talents Numériques Du GC.” Canada.ca, 2025, talent.canada.ca/en/indigenous-it-apprentice.

⁸⁵ “The Missing Code: Indigenous Perspectives in AI | First Nations Technology Council.” First Nations Technology Council, 23 July 2025, www.technologycouncil.ca/news/the-missing-code. Accessed 14 Oct. 2025.

⁸⁶ Bryan, Valerie, et al. “Analysis on Artificial Intelligence Use by Businesses in Canada, Second Quarter of 2025.” Statcan.gc.ca, Government of Canada, Statistics Canada, 16 June 2025, www150.statcan.gc.ca/n1/pub/11-621-m/11-621-m2025008-eng.htm.

⁸⁷ “Communications Security Establishment.” Cse-Cst.gc.ca, 2018, www.cse-cst.gc.ca/en.

⁸⁸ National Defence. “National Defence - Canada.ca.” Canada.ca, 2015, www.canada.ca/en/department-national-defence.html.

⁸⁹ Intelligence Service. “Canadian Security Intelligence Service - Canada.ca.” Canada.ca, 2019, www.canada.ca/en/security-intelligence-service.html.

⁹⁰ “Royal Canadian Mounted Police | Royal Canadian Mounted Police.” Rcmp.ca, 2024, rcmp.ca/en.

⁹¹ Government of Canada, Global Affairs Canada, and Gouvernement du Canada, Affaires mondiales Canada. “Global Affairs Canada | Affaires Mondiales Canada.” International.gc.ca, 2020, www.international.gc.ca.

⁹² National Defence. “Our North, Strong and Free: A Renewed Vision for Canada’s Defence.” Www.canada.ca, 8 Apr. 2024, www.canada.ca/en/department-national-defence/corporate/reports-publications/north-strong-free-2024.html.

⁹³ and, Employment. “What We Heard: Results from the AI Trust Study on Canada.ca - Canadian Digital Service.” Canada.ca, 2025, digital.canada.ca/2025/02/18/what-we-heard-results-from-the-ai-trust-study-on-canada.ca.

⁹⁴ Canada, Competition Bureau. “The Competition Bureau’s Logic Model.” Canada.ca, 19 Jan. 2022, competition-bureau.canada.ca/en/competition-bureaus-logic-model. Accessed 14 Oct. 2025.

⁹⁵ Canada. “Appendix A: Logic Model - Central Agencies Portfolio Evaluation.” Justice.gc.ca, 2022, www.justice.gc.ca/eng/rp-pr/cp-pm/eval/rep-rap/2016/cap-poc/p8.html. Accessed 15 Oct. 2025.

⁹⁶ Canada, Global Affairs. “Results-Based Management Checklist 1.1 – How to Assess And/or Review a Logic Model.” GAC, 2017, www.international.gc.ca/world-monde/funding-financement/rbm-gar/tip_sheet_1_1-fiche_conseil_1_1.aspx?lang=eng. Accessed 14 Oct. 2025.

⁹⁷ Canada, Global Affairs. “Results-Based Management for International Assistance Programming: A How-to Guide.” GAC, 19 Oct. 2015, www.international.gc.ca/world-monde/funding-financement/resultats_based_management-gestion_axee_resultats-guide.aspx?lang=eng.

⁹⁸ Kowalski, Robert, and Marek Sergot. “A Logic-Based Calculus of Events.” New Generation Computing, vol. 4, no. 1, Mar. 1986, pp. 67–95, <https://doi.org/10.1007/bf03037383>. Accessed 12 July 2022

⁹⁹ den Heyer, Molly. The development of a Temporal Logic Model, University of Guelph, 2001.

logical systems. The Directive on Automated Decision-Making¹⁰⁰ must evolve; imbued with consistent enforcement of the Algorithmic Impact Assessment (AIA) Tool¹⁰¹ for risk management. Enabling logical interoperability reduces barrier-to-entry by ensuring regulatory compliance¹⁰² in tandem with well-founded, formal linguistics.

Plain language¹⁰³ as an accessible standard¹⁰⁴ is more than a 30-year undertaking in Canada, without a formal contractual syntax in Canadian Bar Association linguistics¹⁰⁵. This is expressed in journals¹⁰⁶ and theory; “the law-maker [must] avoid as far as possible ambiguities in the text of the law; but the nature of language makes [this only somewhat possible]”¹⁰⁷. Citizens must insist on conformance checking and markup of legislation and contractual relations¹⁰⁸ with languages and frameworks such as Symboleo¹⁰⁹, L4¹¹⁰, $\mathcal{CL}$ ¹¹¹ and FCL¹¹², in coordination of standard and conceptual machine representation such as Knowledge¹¹³/Conceptual Graphs¹¹⁴ for explainable AI – the biggest challenge in AI¹¹⁵, according to the OSFI. Robson calls upon Canada to develop accessible, multilingual, Indigenous “Rapid Solution Labs” in concert with the G7 GovAI Grand Challenge¹¹⁶ to accelerate responsible uptake using intelligent tools, working to foster clarity and coordination and reducing regulatory and systematic risk.

How will we know if Canada is meaningfully engaging with and adopting AI? What are the best measures of success?

As a measure of success; we expect more than 50% of Canadian citizens to trust AI as a whole¹¹⁷ – and make this known through Statistics Canada. Automated metrics systems in public-sector deployment of systems can provide AIA results, provenance summaries, content-

¹⁰⁰ Directive on Automated Decision-Making

¹⁰¹ Algorithmic Impact Assessment tool

¹⁰² Chan, Katherine. “Essential Legal Due Diligence for Investing in AI Companies: Top Tips for Investors and Legal Advisors | Miller Thomson.” Miller Thomson, 11 June 2024,

www.millerthomson.com/en/insights/technology-ip-and-privacy/essential-due-diligence-investing-ai-companies-tips-investors-legal-advisors. Accessed 22 Oct. 2025.

¹⁰³ Canada. “Plain Language, Clear and Simple: Trainer’s Guide.: MP95-2/1-1994E-PDF - Government of Canada Publications - Canada.ca.” Publications.gc.ca, 2025, publications.gc.ca/site/eng/9.838258/publication.html. Accessed 14 Oct. 2025.

¹⁰⁴ “CAN-ASC-3.1:2025 – Plain Language - Accessibility Standards Canada.” Canada.ca, 2025, accessible.canada.ca/creating-accessibility-standards/can-asc-312025-plain-language.

¹⁰⁵ “Plain Language Legal Writing: Part II – Writing to Be Understood | Canadian Bar Association.” Cba.org, 2025, www.cba.org/resources/cba-practicelink/plain-language-legal-writing-part-ii-writing-to-be-understood. Accessed 14 Oct. 2025.

¹⁰⁶ “L’interprétation Des Contrats En Droit Des Affaires et La Règle Du Texte Clair: Une Confusion Jurisprudentielle | Canadian Bar Association.” Cba.org, 2025, [cba.org/Sections/Business-Law/Resources/L-interpretation-des-contrats-en-droit-des-affaires-et-la-regle-du-texte-clair-une-confusion-juris](https://www.cba.org/Sections/Business-Law/Resources/L-interpretation-des-contrats-en-droit-des-affaires-et-la-regle-du-texte-clair-une-confusion-juris). Accessed 14 Oct. 2025.

¹⁰⁷ Kelsen, Hans. Pure Theory of Law. Translation from the Second German Edition by Max Knight. Berkeley: University of California Press, 1967

¹⁰⁸ Griffio, Cristine, et al. Modeling the Dynamics of Contractual Relations. Vol. 6, 11 Apr. 2023, [www.ncbi.nlm.nih.gov/pmc/articles/PMC10126499](https://doi.org/10.3389/frai.2023.1042319), <https://doi.org/10.3389/frai.2023.1042319>.

¹⁰⁹ CSM Lab: Symboleo Conformance Checker (2020). <https://github.com/Smart-Contract-Modelling-uOttawa/Symboleo-Compliance-Checker>. Accessed 26 Oct 2020

¹¹⁰ “L4 - Rules as Code | L4 - Rules as Code.” Legalese.com, 3 Aug. 2025, l4.legalese.com. Accessed 14 Oct. 2025.

¹¹¹ Cristian Prisacariu, and Gerardo Schneider. “A Dynamic Deontic Logic for Complex Contracts.” The Journal of Logic and Algebraic Programming, vol. 81, no. 4, 1 May 2012, pp. 458–490, <https://doi.org/10.1016/j.jlap.2012.03.003>. Accessed 14 Dec. 2023.

¹¹² A Formal Language for Writing Contracts. William M. Farmer. McMaster University. Hamilton, Ontario, Canada wmfarmer@mcmaster.ca. Qian Hu. McMaster University.

¹¹³ Rajabi, Enayat, and Kobra Etmnani. “Knowledge-Graph-Based Explainable AI: A Systematic Review.” Journal of Information Science, 24 Sept. 2022, p. 016555152211128, <https://doi.org/10.1177/01655515221112844>.

¹¹⁴ (1995) Canada and computer representations of design standards and building codes. International Journal of Construction Information Technology, 3(1):1-12

¹¹⁵ Office. “Why the Biggest AI Challenge May Be Explaining What It Does - Office of the Superintendent of Financial Institutions.” Osfi-Bsif.gc.ca, 30 Apr. 2023, www.osfi-bsif.gc.ca/en/about-osfi/reports-publications/financial-industry-forum-artificial-intelligence-canadian-perspective-responsible-ai/why-biggest-ai-challenge-may-be-explaining-what-it-does. Accessed 14 Oct. 2025.

¹¹⁶ Canada.ca, 2024, g7.canada.ca/en/news-and-media/news/g7-leaders-statement-on-ai-for-prosperity.

¹¹⁷ Unknown. “Less than Half of Canadians Say They Trust AI, according to New Survey Data.” The Globe and Mail, 15 Aug. 2025, www.theglobeandmail.com/business/adv/article-less-than-half-of-canadians-say-they-trust-ai-according-to-new-survey. Accessed 27 Oct. 2025.

credential use, environmental telemetry, and uptake of guidelines. Canadians expect published statistics¹¹⁸ from organizations such as NSIRA¹¹⁹; Natural Resources' Sustainable Development Strategy¹²⁰ must be implemented toward open and transparent AI reporting – which is used in our national census¹²¹.

The Treasury Board Secretariat has decreed Open by Default¹²² and Open Standards¹²³ to be upheld, and Robson envisions accessible, national testbeds for government systems' Quality Assurance. We need a national, central issuance of content watermarking¹²⁴ akin to Digital Object Identifiers¹²⁵ for data traceability and provenance to uphold a fingerprint of attribution. In tandem with CRTC interpretations of “intelligence”, data marshalling must be in concert with copyright enforcement at the national level.

¹¹⁸ Branch, Legislative Services. “Consolidated Federal Laws of Canada, Statistics Act.” Laws-Lois.justice.gc.ca, 12 Dec. 2017, laws-lois.justice.gc.ca/eng/acts/s-19/fulltext.html.

¹¹⁹ “Home - National Security and Intelligence Review Agency.” National Security and Intelligence Review Agency, 13 June 2024, nsira-ossnr.gc.ca/en/home.

¹²⁰ and, Environment. “Strategies and Reports - Canada.ca.” Canada.ca, 2022, www.canada.ca/en/environment-climate-change/services/climate-change/federal-sustainable-development-strategy/strategies-reports.html. Accessed 14 Oct. 2025.

¹²¹ “Artificial Intelligence at Statistics Canada.” Www.statcan.gc.ca, www.statcan.gc.ca/en/trust/collecting-your-data/artificial-intelligence.

¹²² Board, Treasury. “Work in the Open by Default - Canada.ca.” Canada.ca, 2022, www.canada.ca/en/government/system/digital-government/government-canada-digital-standards/work-open-default.html. Accessed 14 Oct. 2025.

¹²³ “Open Resource Exchange.” Canada.ca, 2018, code.open.canada.ca/en/open-standards.html. Accessed 14 Oct. 2025.

¹²⁴ “Digital Watermarking for Interoperable and Durable Content Credentials.” Contentauthenticity.org, 2025, contentauthenticity.org/blog/digital-watermarking-interoperable-durable-content-credentials. Accessed 14 Oct. 2025.

¹²⁵ foundation, DOI. “Digital Object Identifier System.” Doi.org, 2016, www.doi.org.

Commercialization of AI

What needs to be put in place so Canada can grow globally competitive AI companies while retaining ownership, IP and economic sovereignty?

In concert with organizations such as CCC¹²⁶, GAC¹²⁷, and EDC¹²⁸, we must leverage AI to coordinate markets, innovators and businesses with international trade portfolios using international legal frameworks¹²⁹. Robson is uniquely positioned for inclusive trade initiatives via Indigenous-export programs¹³⁰ and innovators¹³¹ to co-develop its AI Platform with a Canada-US Tribal AI cohort in conjunction with IRCC¹³² and CBSA¹³³ using national strategies¹³⁴ and action plans under Measure 52¹³⁵, with tax remissions via JC-USGPRO¹³⁶.

Under the US-Canada Defence Production Sharing Agreement¹³⁷, we expect an installable framework. For example: Robson's Platform, to evaluate an AI systems' technological readiness level (TRL)¹³⁸ for North American deployment, using a National QA guidance pipeline – part of our recommended prerequisite Accessible Instrument. If Platform Intellectual Property (IP) ownership is delivered with model provenance and subject to copyright, certification through CIPO¹³⁹ – with authorized and licenced use¹⁴⁰ – must also be given. With lengthy backlogs in IP processing¹⁴¹ and CPATAA¹⁴² under 5 years old, Robson is keen to offer its AI Platform solution for IP strategy work, such as with the MyCIPO Patent e-service¹⁴³ and Next Generation Patents (NGP)¹⁴⁴, to quicken processing times against an incoming surge of filings in AI¹⁴⁵. Our recommendation is to fast-track high-priority systems that significantly reduce risk, quicken national operations, provision security, and provide immediate socioeconomic benefit, especially to marginalized First Nations peoples.

¹²⁶ "Home - the Canadian Commercial Corporation (CCC)." The Canadian Commercial Corporation (CCC), 2019, www.ccc.ca/en. Accessed 5 Aug. 2019.

¹²⁷ Government of Canada, Global Affairs Canada, and Gouvernement du Canada, Affaires mondiales Canada. "Global Affairs Canada | Affaires Mondiales Canada." International.gc.ca, 2020, www.international.gc.ca.

¹²⁸ EDC. "Export Development Canada (EDC)." Wwww.edc.ca, 2018, www.edc.ca.

¹²⁹ United Nations. "UN Charter." United Nations, 1945, www.un.org/en/about-us/un-charter

¹³⁰ "Indigenous Business at EDC." Wwww.edc.ca, www.edc.ca/en/campaign/indigenous-business.html.

¹³¹ "Canada Research Chair in International and Comparative Law of Artificial Intelligence | Research and Innovation." Research and Innovation, 2025, www.uottawa.ca/research-innovation/centre-law-technology-society/chairs/crc-international-comparative-law-ai. Accessed 14 Oct. 2025.

¹³² Government of Canada. "Immigration, Refugees and Citizenship Canada - Canada.ca." Canada.ca, 2019, www.canada.ca/en/immigration-refugees-citizenship.html.

¹³³ Government of Canada. "Canada Border Services Agency (CBSA)." Wwww.cbsa-asfc.gc.ca, 14 Oct. 2014, www.cbsa-asfc.gc.ca/menu-eng.html.

¹³⁴ Government of Canada. "Chapter 1: Shared Priorities." Wwww.justice.gc.ca, 10 Mar. 2023, www.justice.gc.ca/eng/declaration/ap-pa/ah/p2.html.

¹³⁵ Government of Canada, Department of Justice. "The Action Plan." Wwww.justice.gc.ca, 10 Mar. 2023, www.justice.gc.ca/eng/declaration/ap-pa/index.html.

¹³⁶ Branch, Legislative Services. "Joint Canada-United States Government Projects Remission Order." Justice.gc.ca, 2025, laws-lois.justice.gc.ca/eng/regulations/SI-91-9. Accessed 15 Oct. 2025.

¹³⁷ "About DPSA." Canadian Commercial Corporation (CCC), 25 Jan. 2024, www.ccc.ca/en/canadian-exporters/dpsa.

¹³⁸ Government of Canada. "Technology Readiness Levels." Ised-Isde.canada.ca, 23 Jan. 2018, ised-isde.canada.ca/site/innovation-canada/en/technology-readiness-levels.

¹³⁹ Government of Canada. "Canadian Intellectual Property Office - Home." Ised-Isde.canada.ca, 6 Dec. 2022, ised-isde.canada.ca/site/canadian-intellectual-property-office/en.

¹⁴⁰ Branch, Legislative Services. "Consolidated Federal Laws of Canada, Trademarks Act." Laws-Lois.justice.gc.ca, 1 July 2020, laws-lois.justice.gc.ca/eng/acts/t-13.

¹⁴¹ "Patent Practice Committee Meeting PB/IPIC – February 4, 2025." Canada.ca, 22 July 2025, ised-isde.canada.ca/site/canadian-intellectual-property-office/en/patents/patent-practice-committee-meeting-pbipic-february-4-2025#Section3. Accessed 15 Oct. 2025.

¹⁴² Office, Property. "College of Patent Agents and Trademark Agents." Canada.ca, 28 June 2021, ised-isde.canada.ca/site/canadian-intellectual-property-office/en/college-patent-agents-and-trademark-agents. Accessed 15 Oct. 2025.

¹⁴³ "MyCIPO Patents – What to Expect." Canada.ca, 8 Oct. 2025,

ised-isde.canada.ca/site/canadian-intellectual-property-office/en/patents/mycipo-patents-what-expect. Accessed 15 Oct. 2025.

¹⁴⁴ "Next Generation Patents (NGP)." Canada.ca, 8 Oct. 2025,

ised-isde.canada.ca/site/canadian-intellectual-property-office/en/patents/next-generation-patents. Accessed 15 Oct. 2025.

¹⁴⁵ Office, Property. "Processing Artificial Intelligence: International Importance of IP and AI." Canada.ca, 2 Oct. 2020, ised-isde.canada.ca/site/canadian-intellectual-property-office/en/processing-artificial-intelligence-international-importance-ip-and-ai#concentration. Accessed 15 Oct. 2025.

What changes to the Canadian business enabling environment are needed to unlock AI commercialization?

Automated enforced implementations of acts such as AIDA¹⁴⁶ and the incoming C-27¹⁴⁷, Privacy Act¹⁴⁸ and PIPEDA¹⁴⁹ in systems concerning the Generative AI Guide¹⁵⁰ is understandably difficult; an accessible instrument is needed. Sovereign AI must perform with applicable logic that is rooted in legislature¹⁵¹. If government cannot continuously test nor deliver, then citizens will lose faith in its capacity to function. Robson recommends ISED adopt a Continuous Integration and Continuous Delivery (CI/CD) mandate to abolish application periods for programs and initiatives¹⁵², such as the Indigenous Intellectual Property Program Grant¹⁵³ and the Accessible Technology Program¹⁵⁴ – both of which were inaccessible at the time of this publication¹⁵⁵. We must work toward technological Indigenous procurement gaps comprising more than 30% of marginalized federal economic activities¹⁵⁶.

How can Canada better connect AI research with commercialization to meet strategic business needs?

With 10% of global bright-minded AI researchers¹⁵⁷, Canada must bridge the “lab-to-market” gap and capitalize upon its organizational research efforts¹⁵⁸. Private sectors prioritize research in Energy, Defence, Industrial Production, and Transport/Infrastructure¹⁵⁹. However, experts are unsure of the reason behind Canada’s stagnating¹⁶⁰ productivity growth¹⁶¹. We expect the GovAI Grand Challenge¹⁶² “Rapid Solution Labs” to prioritize use cases in these fields; sector-specific research hubs and publicized national AI missions to coordinate filling commercial gaps. Once innovative Indigenous business cohorts can prove to be a productive and economic solution¹⁶³, we must create more corporate labs.

¹⁴⁶ Government of Canada. “The Artificial Intelligence and Data Act (AIDA) – Companion Document.” *Ised-Isde.canada.ca*, Government of Canada, 2023, ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act-aida-companion-document.

¹⁴⁷ “C-27 (44-1) - LEGISinfo - Parliament of Canada.” *Www.parl.ca*, www.parl.ca/LegisInfo/en/bill/44-1/C-27.

¹⁴⁸ Branch, Legislative Services. “Consolidated Federal Laws of Canada, Privacy Act.” *Laws-Lois.justice.gc.ca*, 28 Aug. 2019, laws-lois.justice.gc.ca/ENG/ACTS/P-21/index.html.

¹⁴⁹ Government of Canada. “Personal Information Protection and Electronic Documents Act.” *Justice.gc.ca*, 2025, laws-lois.justice.gc.ca/eng/acts/P-8.6.

¹⁵⁰ Government of Canada. “Guide on the Use of Generative AI.” *Www.canada.ca*, 6 Sept. 2023, www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsible-use-ai/guide-use-generative-ai.html.

¹⁵¹ Bradley Henderson, Maintaining Legitimacy: Artificial Intelligence, Automated Decision Making, and Reasonableness Review under Canadian Administrative Law, 2025 58-2 UBC Law Review 415, 2025 CanLIIDocs 1960, <https://canlii.ca/t/7np8q>, Accessed on October 15, 2025.

¹⁵² Government of Canada, Innovation. “Programs and Initiatives.” *Ised-Isde.canada.ca*, 28 Sept. 2022, ised-isde.canada.ca/site/ised/en/programs-and-initiatives.

¹⁵³ Government of Canada, Innovation. “Indigenous Peoples and Intellectual Property.” *Ised-Isde.canada.ca*, 15 Feb. 2023, ised-isde.canada.ca/site/intellectual-property-strategy/en/indigenous-peoples-and-intellectual-property.

¹⁵⁴ “Accessible Technology Program.” *Canada.ca*, 21 July 2025, ised-isde.canada.ca/site/ised/en/programs-and-initiatives/accessible-technology-program.

¹⁵⁵ *Ibid*

¹⁵⁶ “2025-26 and 2026-27 Planned Procurement – Mandatory Minimum 5% Indigenous Procurement Target - Open Government Portal.” *Canada.ca*, 2025, open.canada.ca/data/en/dataset/88bd5306-e0a1-46dd-8e02-909931ade592. Accessed 26 Oct. 2025.

¹⁵⁷ “Consultations on Artificial Intelligence (AI) Compute.” *Canada.ca*, 5 Dec. 2024, ised-isde.canada.ca/site/ised/en/public-consultations/consultations-artificial-intelligence-ai-compute.

¹⁵⁸ Mitacs, AMII, CIFAR, NRC, Vector, CAISI, DRA, CANARIA/NREN, CFI

¹⁵⁹ Canada Foundation for Innovation. “2024 Report on results: An annual summary of project outputs and outcomes”. November, 2024.

¹⁶⁰ “Engines of Growth | Business Council of Canada.” Business Council of Canada, 28 Aug. 2025, www.thebusinesscouncil.ca/report/engines-of-growth/#tccs. Accessed 15 Oct. 2025.

¹⁶¹ “Canada Has a Productivity Growth Problem – as Does Almost Everybody Else – C.D. Howe Institute.” C.D. Howe Institute, 10 Mar. 2025, cdhowe.org/publication/canada-has-a-productivity-growth-problem-as-does-almost-everybody-else.

¹⁶² *Canada.ca*, 2024, g7.canada.ca/en/news-and-media/news/g7-leaders-statement-on-ai-for-prosperity.

¹⁶³ In. “Carney Government Should Recognize That Private Sector Drives Canada’s Economy.” Fraser Institute, 2025, www.fraserinstitute.org/commentary/carney-government-should-recognize-private-sector-drives-canadas-economy.

Our recommendations in this guide – including those for an Accessible Instrument as effective policy¹⁶⁴ – should act as catalysts for novel connections between research and commercial practice; creating advanced infrastructure. As an Indigenous-led AI champion; Robson is strategically positioned to meet strategic business needs with low-SWaP solutions for intelligence, surveillance, and reconnaissance – in concert with and mainline enterprise workloads – to operate securely in major cities and remote northern environments.

¹⁶⁴ “Engines of Growth | Business Council of Canada.” Business Council of Canada, 28 Aug. 2025, www.thebusinesscouncil.ca/report/engines-of-growth/#ecs. Accessed 15 Oct. 2025.

Scaling Canadian Champions and Attracting Investments

How does Canada get to more and stronger AI industrial champions? What supports would make our champions own the podium?

A champion respects the rules and encourages players with professional conduct. Industrial champions have trusted partnerships¹⁶⁵, skilled people¹⁶⁶, predictable regulation¹⁶⁷, market access¹⁶⁸, and proprietary IP. If AI regulations are to be jointly respected between developers and judiciaries, organizations must move from voluntary¹⁶⁹ conduct to enforceable standardization. Moving from traditional scale-up tools (procurement, capital, infrastructure, talent) to enforceable policy with Indigenous-centred data governance, we recommend targeted supports that enable Indigenous-led ownership, IP stewardship, and benefit-sharing

Industrial Champions that embed Indigenous governance and community control are more sustainable and globally defensible¹⁷⁰. Ignoring the impending array of sweeping changes will cause reputational, legal and financial damage. Crown and industry actors must recognize this risk and design around it, rather than exporting liabilities claiming to be reasonable¹⁷¹. Robson's Platform aims to reduce legal uncertainty and long-term risk by embedding Indigenous governance and rights into Canada's AI industrial strategy. We understand that Bill C-15¹⁷² is a threat to legitimate operation in major organizations using models against incoming Canadian AI legislation. We recommend coordinated, national adoption of an Accessible Instrument as part of a Grand Challenge¹⁷³ to "own the podium" – enabling early adopters to engage in sovereign mechanisms with "clear measurable indicators" of impact¹⁷⁴.

¹⁶⁵ sherry. "How Digital Partnerships Are Transforming Canadian Business Growth - Business & Industry Canada." Business & Industry Canada, 4 May 2025, www.industryandbusiness.ca/how-digital-partnerships-are-transforming-canadian-business-growth. Accessed 15 Oct. 2025.

¹⁶⁶ "Future Skills Centre • Centre Des Compétences Futures." Fsc-Ccf.ca, 2024, fsc-ccf.ca/research/ai-and-future-skills.

¹⁶⁷ Bryan, Valerie, et al. "Analysis on expected use of artificial intelligence by businesses in Canada, third quarter of 2025 / by Valerie Bryan, Shivani Sood and Chris Johnston. Statcan.gc.ca, Government of Canada, Statistics Canada, 11 Sept. 2025, <https://publications.gc.ca/site/eng/9.954361/publication.html>. Accessed 15 Oct. 2025.

¹⁶⁸ Canada, IBM. "Canadian Businesses Saw Uptick in AI Adoption in 2023 vs. Global Peers." Newswire.ca, CNW Group, 10 Jan. 2024, www.newswire.ca/news-releases/canadian-businesses-saw-uptick-in-ai-adoption-in-2023-vs-global-peers-884325462.html. Accessed 15 Oct. 2025.

¹⁶⁹ Government of Canada. "Voluntary Code of Conduct on the Responsible Development and Management of Advanced Generative AI Systems." *Ised-Isde.canada.ca*, 28 Sept. 2023, ised-isde.canada.ca/site/ised/en/voluntary-code-conduct-responsible-development-and-management-advanced-generative-ai-systems.

¹⁷⁰ "AI Threatens Indigenous Data Sovereignty and Digital Self-Determination." Policy Options, 22 May 2025, policyoptions.irpp.org/2025/05/ai-indigenous-data.

¹⁷¹ Canada, Export Development. "Gen AI Risk Management for Export Businesses: Your Path to Success." Wwww.edc.ca, Export Development Canada, 20 Feb. 2025, www.edc.ca/en/article/gen-ai-risk-management-for-export-businesses.html. Accessed 15 Oct. 2025.

¹⁷² Canada. "Questions and Answers – Bill C-15: An Act Respecting the United Nations Declaration on the Rights of Indigenous Peoples." Justice.gc.ca, 2016, canada.justice.gc.ca/eng/trans/bm-mb/other-autre/c15_1/qa-qr.html.

¹⁷³ Canada.ca, 2024, g7.canada.ca/en/news-and-media/news/g7-leaders-statement-on-ai-for-prosperity.

¹⁷⁴ Canada. "Bill C-15: What We Learned Report." Justice.gc.ca, 2020, www.justice.gc.ca/eng/declaration/wwl-cna/c15/index.html#s4-1-6. Accessed 15 Oct. 2025.

What changes to Canada's landscape of business incentives would accelerate sustainable scaling of AI ventures?

Sustainable scaling entails accountable¹⁷⁵ benefits for individual, community, and systems levels¹⁷⁶. The quid-pro-quo of government incentives results in collective prosperity¹⁷⁷. Unfortunately; Canada's Indigenous socioeconomic disparity¹⁷⁸ grows with export and exploitation¹⁷⁹ of non-compliant AI systems¹⁸⁰. Companies that openly commit to UN Sustainable Development Goals invest less in the community, compared to those that do not formally commit¹⁸¹, leading to greenwashed Corporate Social Responsibility (CSR). Justice for exploitation of integrationist architectures, where Indigenous knowledge is devalued and abused¹⁸², must be served programmatically. We encourage Canada to incentivize businesses, in respect of regulation, or risk global debasement with continued corruptive and unsustainable practice. Continuous quality assurance of sustainability can be mandated and produced through the Major Projects Office¹⁸³, in tandem with the Canada Infrastructure Bank¹⁸⁴, the Canada Growth Fund¹⁸⁵, and the Indigenous Loan Guarantee Program¹⁸⁶. Canadians can accelerate sustainable scaling of AI ventures and industrial ecosystems¹⁸⁷, in Net-Zero¹⁸⁸ fashion, in defence of sustainable socioeconomic and ecological practice.

How can we best support AI companies to remain rooted in Canada while growing strength in global markets?

Government and business alike must remember their responsibilities towards the land, its peoples, and our mission¹⁸⁹; providing financial motivation for measurable outcomes¹⁹⁰ with socioeconomic and ecological commitment from businesses. Sovereign technology solutions using on-reserve data centres for domestic compute while employing Indigenous IT talent, will ensure AI companies remain rooted in Canada and globally competitive¹⁹¹. Robson supports

¹⁷⁵ Office of the Auditor General of Canada. *Report 5—Innovation and Industrial Policy*. Office of the Auditor General, 2022, https://www.oag-bvg.gc.ca/internet/English/parl_oag_202205_05_e_44037.html.

¹⁷⁶ "Strategic Funding Model for Scale-Up: The Experience of the Innovation Strategy (Infographic) - Canada.ca." Canada.ca, 2023, www.canada.ca/en/public-health/services/publications/health-system-services/strategic-funding-model-scale-up-experience-innovation-strategy-infographic.html. Accessed 15 Oct. 2025.

¹⁷⁷ Organisation for Economic Co-operation and Development. *OECD Economic Surveys: Canada 2023*. OECD Publishing, 2023, <https://www.oecd.org/economy/canada-economic-snapshot>.

¹⁷⁸ Indigenous Services Canada. *Community Well-Being Index 2023: Socio-Economic Gaps between Indigenous and Non-Indigenous Communities*. Government of Canada, 2023. <https://www.sac-isc.gc.ca>.

¹⁷⁹ Chiefs of Ontario. First Nations and Artificial Intelligence Research Paper. Press Release, https://chiefs-of-ontario.org/wp-content/uploads/2024/05/2024_08_16_RP_First_Nations_and_AI_Paper_BW_final_Ack.pdf. September 26, 2024. Accessed

¹⁸⁰ TJC. "The New Frontier: Artificial Intelligence, Copyright and Indigenous Culture." Terri-Janke, terri-janke, 30 Nov. 2023, www.terrijanke.com.au/post/the-new-frontier-artificial-intelligence-copyright-and-indigenous-culture.

¹⁸¹ David Benjamin Billedeau, and Jeffrey Wilson. "Assessing the Impact of the Sustainable Development Goals on Corporate Philanthropy: A Study of Canada's Leading Private Sector Companies." *Business Strategy and Development*, vol. 7, no. 1, 6 Nov. 2023, <https://doi.org/10.1002/bsd2.315>.

¹⁸² Assembly of First Nations. "Ethics in First Nations research". 2009. https://achh.ca/wp-content/uploads/2018/07/Guide_Ethics_AFN.pdf. Access 15 Oct 2025.

¹⁸³ "Prime Minister Carney Launches New Major Projects Office to Fast-Track Nation-Building Projects." Prime Minister of Canada, 2025, www.pm.gc.ca/en/news/news-releases/2025/08/29/prime-minister-carney-launches-new-major-projects-office-fast-track-nation-building-projects.

¹⁸⁴ "Canada Infrastructure Bank (CIB) | Canada Infrastructure Bank (CIB)." CIB-Bic.ca, 2024, cib-bic.ca.

¹⁸⁵ "Home." Canada Growth Fund, 2025, www.cgf-fcc.ca/en. Accessed 15 Oct. 2025.

¹⁸⁶ Canada, Finance. "Canada Indigenous Loan Guarantee Corporation." Canada.ca, Government of Canada, 16 Dec. 2024, www.canada.ca/en/department-finance/news/2024/12/canada-indigenous-loan-guarantee-corporation.html.

¹⁸⁷ Council of Canadian Academies. *Competing in a Global Innovation Economy: The Current State of R&D in Canada*. Council of Canadian Academies, 2021, <https://cca-reports.ca/reports/the-state-of-science-and-technology-and-industrial-research-and-development-in-canada>.

¹⁸⁸ Environment and Climate Change Canada. *Net-Zero Accelerator Initiative*. Government of Canada, 2023, <https://www.canada.ca/en/innovation-science-economic-development/news/2023/06/net-zero-accelerator.html>.

¹⁸⁹ Defence, National. "Opening Words and Land Acknowledgement." Wwww.canada.ca, 25 Apr. 2022, www.canada.ca/en/department-national-defence/corporate/reports-publications/mnd-advisory-panel-systemic-racism-discrimination-final-report-jan-2022/opening-words-and-land-acknowledgement.html.

¹⁹⁰ Prairies Economic Development Canada (PrairiesCan). *Business Scale-Up and Productivity Program*. Government of Canada, 2024, <https://www.canada.ca/en/prairies-economic-development/services/funding/business-scale-up-productivity.html>.

¹⁹¹ "Consultations on Artificial Intelligence (AI) Compute." Canada.ca, 5 Dec. 2024, iscd-isde.canada.ca/site/iscd/en/public-consultations/consultations-artificial-intelligence-ai-compute.

an Indigenous Ombudsperson to help make global AI incentives bankable and risk-free¹⁹² – we uphold cutting-edge innovation with economic reconciliation and compliance assurance as a business mandate, in line with an ongoing Transformative Indigenous Procurement Strategy¹⁹³. First Nations Major Project consultations¹⁹⁴ need to hold themselves to high international standard to grow domestically and internationally.

Growing strength in global markets requires coordinated investment; catering to due diligence processes requires removal of regulatory ambiguity¹⁹⁵. Wait-and-see directives for AI expansion are opportunity costs; the External Advisory Committee on Regulatory Competitiveness calls for immediate cabinet directives¹⁹⁶ on regulatory excellence¹⁹⁷ as a “north star”. We see 100% sovereign compute capacity as a feasible goal, to this end. While domestic roots in compute, talent, and IP protection are a launchpad for global expansion, Robson is increasing its Platform’s capacity as a national Accessible Instrument for guarding Policy Frameworks; a secure, ecological, regulatory Indigenous agent rooted in automatic policy adherence and dependable governance.

What lessons can we learn from countries that are successful at investment attraction in AI and tech, both from domestic sources and from foreign capital?

Programmatic and automatic adherence, using data source integration with neural/logic engines, is part of a \$2T global cybersecurity market¹⁹⁸ that requires AI risk-mitigation practices in high-valued industries. OSFI cites¹⁹⁹ numerous guidelines²⁰⁰ to safeguard our industries with regulatory technology²⁰¹, as a prerequisite for actual domestic and foreign investment. Managed-service provider partnership strategies with sovereign, Canadian, data centres can be a safehouse for the world’s information and defence operations for Five Eyes, Commonwealth, and NORAD players. Sweeping mandates, as we learned from EO 14028²⁰², in the form of Crown Prerogative²⁰³ can help us climb out of our stagnant regulations²⁰⁴ – the Organisation for Economic Co-operation and Development ranks Canada almost last in

¹⁹² Research Data Alliance International Indigenous Data Sovereignty Interest Group. CARE principles for Indigenous data governance. (The Global Indigenous Data Alliance, GIDA-global.org, September 2019).

¹⁹³ Canada; “Transformative Indigenous Procurement Strategy: Dialogue with Indigenous Partners.” Sac-Iscc.gc.ca, 2022, sac-isc.gc.ca/en/1691787188695/1691787230531#how. Accessed 18 Oct. 2025.

¹⁹⁴ SpearChief-Morris, Joy. “Chiefs in Ontario Call for \$66.5M to Fund Major Projects Consultations.” CBC, 21 Oct. 2025, www.cbc.ca/news/indigenous/ontario-chiefs-budget-consultations-9.6943109. Accessed 22 Oct. 2025.

¹⁹⁵ OECD. Case Studies on the Regulatory Challenges Raised by Innovation and the Regulatory Responses. 2021.

¹⁹⁶ Board, Treasury. “Cabinet Directive on Regulation - Canada.ca.” Canada.ca, Sept. 2018, www.canada.ca/en/government/system/laws/developing-improving-federal-regulations/requirements-developing-managing-reviewing-regulations/cabinet-directive-regulation.html.

¹⁹⁷ Board, Treasury. “Advice to the Treasury Board (June 2024) - Canada.ca.” Canada.ca, 2024, canada.ca/en/government/system/laws/developing-improving-federal-regulations/modernizing-regulations/external-advisory-committee-regulatory-competitiveness-advice-treasury-board/external-advisory-june-2024.html. Accessed 15 Oct. 2025.

¹⁹⁸ Aiyer, Bharath, et al. “New Survey Reveals \$2 Trillion Market Opportunity for Cybersecurity Technology and Service Providers | McKinsey.” Www.mckinsey.com, McKinsey & Company, 27 Oct. 2022

www.mckinsey.com/capabilities/risk-and-resilience/our-insights/cybersecurity/new-survey-reveals-2-trillion-dollar-market-opportunity-for-cybersecurity-technology-and-service-providers.

¹⁹⁹ Office. “Consequential Amendments to Guidelines B-10 and B-13 Related to Foreign Branches - Office of the Superintendent of Financial Institutions.” Osfi-bsif.gc.ca, 22 Feb. 2024,

www.osfi-bsif.gc.ca/en/guidance/guidance-library/consequential-amendments-guidelines-b-10-b-13-related-foreign-branches.

²⁰⁰ B-10, B-13, E-21, E-23

²⁰¹ Canadian Regulatory Technology Association. “ARTIFICIAL INTELLIGENCE – GAINING RISK ASSURANCE FROM THIRD-PARTY SUPPLIERS OF AI MODELS/SYSTEMS: Third Party Control Framework” Accessed 15 Oct 2025

²⁰² Executive Office of the President. “Improving the Nation’s Cybersecurity.” Federal Register, 17 May 2021, www.federalregister.gov/documents/2021/05/17/2021-10460/improving-the-nations-cybersecurity.

²⁰³ Defence, National. “Introduction and the Law of the Crown Prerogative.” Aem, 12 Dec. 2013, www.canada.ca/en/department-national-defence/corporate/reports-publications/military-law/crown-prerogative/introduction.html.

²⁰⁴ Canada, Senate of. “Stagnant Regulations Impair Innovation and Economic Growth: Senator Colin Deacon.” SenCanada, 2023, senecanada.ca/en/senaplust/opinion/stagnant-regulations-impair-innovation-and-economic-growth-senator-colin-deacon.

regulatory burden and capital gains tax (35th out of 38) in 2023²⁰⁵. Regulatory innovation and experimentation requires a skill set that is not common in the Government of Canada²⁰⁶.

Our country has ranked the lowest in creative, infrastructure, knowledge, and technology outputs²⁰⁷. For example; 2024's Global Innovation Index saw a 50% decline of investment deal values over the past year, whereby our nation produces less innovation outputs relative to its level of investments²⁰⁸. First Nations can attract foreign capital, with cross-border bridges between tribes, for better education, work, and trade in joint ventures. Canada's weaknesses lie in failures to comply to ISO 1400²⁰⁹, ISO 9001, and ISO 42001 adherence, gross capital formation, labour productivity growth, and IP; we are losing an ecological, educational, and global foothold with reduced ability to export innovation due to lapses in regulatory oversight.

For First Nations, lack of regulation, respect for environment, and self-determination are cause for concern. Robson fosters these priorities in parallel with high-performance computing and AI to align with Canada's export mandates for high-tech manufacturing²¹⁰, information and communication technology, industrial designs, and creative goods.

²⁰⁵ "Product Market Regulation." OECD, 2024,

www.oecd.org/en/topics/sub-issues/product-market-regulation.html.

²⁰⁶ Board, Treasury. "Evaluation of the Centre for Regulatory Innovation - Canada.ca." Canada.ca, 2022,

www.canada.ca/en/treasury-board-secretariat/corporate/reports/cri.html.

²⁰⁷ World Intellectual Property Organization. "Global Innovation Index 2024 - GII 2024 at a Glance." Global Innovation Index 2024, 2024,

www.wipo.int/web-publications/global-innovation-index-2024/en/gii-2024-at-a-glance.html.

²⁰⁸ Ibid

²⁰⁹ ISO. "ISO 14001:2015 Environmental Management Systems — Requirements with Guidance for Use." ISO, 2015,

www.iso.org/standard/60857.html.

²¹⁰ Lead, Editorial. "The Manufacturing Revolution – Transforming Technology into Value." CSPC, 29 Nov. 2022,

sciencepolicy.ca/posts/the-manufacturing-revolution-transforming-technology-into-value.

Building Safe AI Systems and Strengthening Public Trust in AI

How can Canada build public trust in AI technologies while addressing the risks they present? What are the most important things to do to build confidence?

Our people have concern for the implementation of regulations or other governance measures, with more than 1 in 3 Canadians believing the development of AI is generally worrying²¹¹. As an Indigenous agent for change, we must provide the missing **Accessible Instrument** that builds public trust with live, enforceable controls of model, data, and application layers to stand on-guard for policy framework implementation.

We call upon legislation for a peer-reviewed CI/CD QA pipeline for working under the Impact Assessment Act²¹². Canadians want to see guaranteed, published, validation of transparency and safety – federal services, arguably, do not necessarily build confidence (table 2). Canadians must develop services such as these with sovereign, pipelined proof that they pass the rigorous test of upholding legislation; such as a duty to consult²¹³ in conjunction with the CRTC²¹⁴ and copyright act²¹⁵, with sweeping federal mandates of AI directives²¹⁶ including validation checks.

Table 2

Sampled Canadian Federal AI Services' confidentiality, Cyber Risk Assessment, Quality Assurance, and Sovereignty.

Department	Statistics Canada	AAFC	Canada Revenue Agency
Name of Service	<u>Intellistat</u>	<u>AgPal</u>	<u>CRA Chatbot</u>
Confidentiality	Information sent to OpenAI	Unknown	Unknown / "Not Designed for Sensitive Information"
Cyber Risk Assessment	Not Transparent	None	Unknown
Quality Assurance	"AI-generated content may be incorrect"	"surprises and mistakes are possible. Check for mistakes."	"may not be fully accurate or meet your specific needs."
Sovereignty	American (GPT/Azure)	American (OpenAI)	Unknown

²¹¹ "Learning Together for Responsible Artificial Intelligence." Ised-Isde.canada.ca, 3 Mar. 2023, ised-isde.canada.ca/site/advisory-council-artificial-intelligence/en/public-awareness-working-group/learning-together-responsible-artificial-intelligence#6.2

²¹² Canada. "Operational Guide: Requesting a Regional or Strategic Assessment under the Impact Assessment Act - Canada.ca." Canada.ca, 2025, www.canada.ca/en/impact-assessment-agency/services/policy-guidance/requesting-regional-strategic-assessment-iaa.html. Accessed 15 Oct. 2025.

²¹³ Government of Canada. "Government of Canada and the Duty to Consult." Wwww.rcaanc-Cirnac.gc.ca, 15 Mar. 2012, www.rcaanc-cirnac.gc.ca/eng/1331832510888/1609421255810.

²¹⁴ Branch, Legislative Services. "Canadian Radio-Television and Telecommunications Commission Act." Justice.gc.ca, 2025, laws.justice.gc.ca/eng/acts/c-22. Accessed 15 Oct. 2025.

²¹⁵ Legislative Services Branch. "Consolidated Federal Laws of Canada, Copyright Act." Laws-Lois.justice.gc.ca, 17 June 2019 laws-lois.justice.gc.ca/eng/acts/C-42/index.html.

²¹⁶ "Responsible Use of Artificial Intelligence Directive." Ontario.ca, 2021 www.ontario.ca/page/responsible-use-artificial-intelligence-directive.

What frameworks, standards, regulations and norms are needed to ensure AI products in Canada are trustworthy and responsibly deployed?

Table 3

Pertinent Frameworks, Standards, Policies/Regulations and Norms in trusted AI systems

	National	Global
Frameworks	GenAI Guide ²¹⁷ , DADM ²¹⁸ , DSD ²¹⁹	RMF ²²⁰ , G7AITK ²²¹ , GDC ²²² , AIHR ²²³ , AIBoR ²²⁴
Standards	AIDG ²²⁵ , OCAP ²²⁶	ISO 42001 ²²⁷ , NIST CSF ²²⁸ , AI/S/H-BOM ²²⁹
Policies / Regulations	AIDA ²³⁰ , PIPEDA ²³¹ , Broadcasting ²³² , Copyright ²³³ , CPPA ²³⁴ , TCPS2 ²³⁵ , AA ²³⁶	EUAIA ²³⁷ , Hawley-Blumenthal ²³⁸ , Bletchley ²³⁹
Norms	Open Data ²⁴⁰ , Provenance ²⁴¹	CI/CD, QA, ONNX ²⁴²
Codes	Voluntary Code of Conduct ²⁴³	Article 95 ²⁴⁴ , EO13960 ²⁴⁵ , EO14110 ²⁴⁶

²¹⁷ Government of Canada. "Guide on the Use of Generative AI." Wwww.canada.ca, 6 Sept. 2023,

www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsible-use-ai/guide-use-generative-ai.html.

²¹⁸ Government of Canada. "Directive on Automated Decision-Making." Wwww.tbs-Sct.canada.ca, 5 Feb. 2019,

www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32592.

²¹⁹ Secretariat, Treasury Board of Canada. "Directive on Service and Digital." Wwww.tbs-Sct.canada.ca, 5 June 2019,

www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32601.

²²⁰ NIST. "Cybersecurity Framework." National Institute of Standards and Technology, 2025,

www.nist.gov/cyberframework.

²²¹ UNESCO. G7 toolkit for artificial intelligence in the public sector [...], 2024

²²² "Homepage | Global Digital Compact." Un.org, 2024,

www.un.org/global-digital-compact/en.

²²³ Canada, Global Affairs. "Canada Signs the Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democr..." Canada.ca, Government of Canada, 11 Feb. 2025,

www.canada.ca/en/global-affairs/news/2025/02/canada-signs-the-council-of-europe-framework-convention-on-artificial-intelligence-and-human-rights-democracy-and-the-rule-of-law.html.

²²⁴ The White House. "Blueprint for an AI Bill of Rights | OSTP | the White House." The White House, 22 Nov. 2023,

www.whitehouse.gov/ostp/ai-bill-of-rights.

²²⁵ "Standards Database | Artificial Intelligence and Data Governance (AIDG) Standardization Hub." Ai-Standards-Normes-Ia.ca, 2025,

ai-standards-normes-ia.ca/en/home/standards-database. Accessed 15 Oct. 2025.

²²⁶ First Nations Information Governance Centre. "The First Nations Principles of OCAP®." The First Nations Information Governance Centre, 2024, fnigc.ca/ocap-training.

²²⁷ International Organization for Standardization. "ISO/IEC 42001:2023." ISO, 2023,

www.iso.org/standard/42001.

²²⁸ NIST. "Cybersecurity Framework." National Institute of Standards and Technology, 2025,

www.nist.gov/cyberframework.

²²⁹ Department of Homeland Security. MITIGATING ARTIFICIAL INTELLIGENCE (AI) RISK: Safety and Security Guidelines for Critical Infrastructure Owners and Operators. April 2024

²³⁰ Government of Canada. "Artificial Intelligence and Data Act." Ised-Isde.canada.ca, 27 Sept. 2023,

ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act

²³¹ Government of Canada. "Personal Information Protection and Electronic Documents Act." Justice.gc.ca, 2025,

laws-lois.justice.gc.ca/eng/acts/P-8.6.

²³² Branch, Legislative Services. "Consolidated Federal Laws of Canada, Broadcasting Act." Laws.justice.gc.ca, 13 Mar. 2020,

laws-lois.justice.gc.ca/eng/acts/B-9.01.

²³³ Branch, Legislative Services. "Consolidated Federal Laws of Canada, Copyright Act." Laws-Lois.justice.gc.ca, 1 July 2020,

laws-lois.justice.gc.ca/eng/acts/C-42/page-1.html.

²³⁴ Government of Canada. "Consumer Privacy Protection Act." Ised-Isde.canada.ca, 13 Mar. 2023,

ised-isde.canada.ca/site/innovation-better-canada/en/consumer-privacy-protection-act.

²³⁵ Government of Canada. "Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans – TCPS 2 (2022)." Ethics.gc.ca, Government of Canada, 2022,

ethics.gc.ca/eng/policy-politique_tcps2_epts2_2022.html.

²³⁶ Branch, Legislative Services. "Consolidated Federal Laws of Canada, Accessible Canada Act." Laws-Lois.justice.gc.ca, 11 July 2019,

laws-lois.justice.gc.ca/eng/acts/A-0.6.

²³⁷ European Parliament. "EU AI Act: First Regulation on Artificial Intelligence." European Parliament, 19 Feb. 2025,

www.europarl.europa.eu/topics/en/article/20230601STO93804/eu-ai-act-first-regulation-on-artificial-intelligence.

²³⁸ "Blumenthal & Hawley Announce Bipartisan Framework on Artificial Intelligence Legislation | U.S. Senator Richard Blumenthal of Connecticut." Wwww.blumenthal.senate.gov, 8 Sept. 2023,

www.blumenthal.senate.gov/newsroom/press/release/blumenthal-and-hawley-announce-bipartisan-framework-on-artificial-intelligence-legislation.

²³⁹ UK Government. "The Bletchley Declaration by Countries Attending the AI Safety Summit, 1-2 November 2023." GOV.UK, UK Government, 1 Nov. 2023,

www.gov.uk/government/publications/ai-safety-summit-2023-the-bletchley-declaration/the-bletchley-declaration-by-countries-attending-the-ai-safety-summit-1-2-november-2023.

²⁴⁰ Canada, Service. "Linked Open Data Overview - Canada.ca." Canada.ca, 2019,

www.canada.ca/en/services/culture/history-heritage/museology-conservation/collections-management/linked-open-data/linked-open-data-overview.html.

²⁴¹ Editor, CSRC Content. "Data Provenance - Glossary | CSRC." Csrc.nist.gov,

csrc.nist.gov/glossary/term/data_provenance.

²⁴² "ONNX | Home." Onnx.ai, onnx.ai/.

²⁴³ Government of Canada. "Voluntary Code of Conduct on the Responsible Development and Management of Advanced Generative AI Systems." Ised-Isde.canada.ca, 28 Sept. 2023,

ised-isde.canada.ca/site/ised/en/voluntary-code-conduct-responsible-development-and-management-advanced-generative-ai-systems.

²⁴⁴ Article 95: Codes of Conduct for Voluntary Application of Specific Requirements | EU Artificial Intelligence Act.

artificialintelligenceact.eu/article/95.

²⁴⁵ Exec. Order No. 13,960, 83 Fed. Reg. 65814 (Dec. 21, 2018)

²⁴⁶ Exec. Order No. 14110 (Oct. 30, 2023)

How can Canada proactively engage citizens and businesses to promote responsible AI use and trust in its governance? Who is best placed to lead which efforts that fuel trust?

Eighty-five percent of Canadians expect government to regulate AI²⁴⁷ in the form of “guardrails”²⁴⁸. Canada has let one thousand flowers bloom over one hundred; now, ten times as many schools of thought are ready to contend²⁴⁹ any incoming legislature. Federal Ombuds²⁵⁰ must unite in service to field the principles of fairness and equity, and to uphold concerned citizens’ apprehension to a norm that encourages use of irresponsible and untrustworthy government systems. Statistics Canada must critically probe citizens and businesses – contributing to the telemetry of a StatsCan dashboard in order to provide auditable training-data records (sources/licenses), in-line with copyright and generative-AI consultation. Robson’s unique Platform interfaces with such a provenance ledger and export for audits.

It is uncommon for the Canadian government to undertake regulatory innovation and experimentation²⁵¹. Thus, military²⁵² and intelligence²⁵³ must lead the highest degree of mission-critical trust²⁵⁴ by contributing to a Canadian “Platform One”²⁵⁵ framework; a white-glove, logical CI/CD and QA service for AI, akin to Party Bus²⁵⁶ for renewed faith and confidence of Canadian consumers²⁵⁷. Robson expects the Indigenous Reconciliation Program²⁵⁸ and DND to consult²⁵⁹ with First Nations in contributing to Policy Development activities. As part of its defence value proposition, Robson will be please to contribute to this framework.

Once an Accessible Instrument is released to the public under the AI Code of Practice²⁵ and/or EU A.I. Act²⁶⁰, businesses and First Nations will naturally benefit²⁶¹. Our Platform, as part of a nation-building Major Project²⁶², can interface all departments and enforce regulatory systems. We recommend all national systems to interface with this instrument in order to expose risk, transparency, consent, and reporting endpoints.

²⁴⁷ Author, Guest. “Is Canada’s AI Strategy Moving Fast Enough to Compete Globally and Protect Nationally?” Techloy, 15 Oct. 2025, www.techloy.com/is-canadas-ai-strategy-moving-fast-enough-to-compete-globally-and-protect-nationally. Accessed 15 Oct. 2025.

²⁴⁸ Anatoliy Gruz, et al. “Two-Thirds of Canadians Have Experimented with Generative AI, but Most Don’t Understand Its Impacts.” The Conversation, 23 Apr. 2025, theconversation.com/two-thirds-of-canadians-have-experimented-with-generative-ai-but-most-dont-understand-its-impacts-254351.

²⁴⁹ Ban Gu, “Treatise on Literature,” in the Book of Han (《漢書·藝文誌》), Eastern Han Dynasty (25–220 AD).

²⁵⁰ Office. “Federal Ombuds - Canada.ca.” Canada.ca, 2023, www.canada.ca/en/ombudsman-national-defence-forces/federal-ombuds.html.

²⁵¹ Board, Treasury. “Evaluation of the Centre for Regulatory Innovation - Canada.ca.” Canada.ca, 2022, www.canada.ca/en/treasury-board-secretariat/corporate/reports/cr.html.

²⁵² National Defence. “The Department of National Defence and Canadian Armed Forces Artificial Intelligence Strategy - Canada.ca.” Canada.ca, 2024, www.canada.ca/en/department-national-defence/corporate/reports-publications/dnd-caf-artificial-intelligence-strategy.html.

²⁵³ Service, Intelligence. “Partner Focused: Engaging with Canadians and Partners - Canada.ca.” Canada.ca, 2023, www.canada.ca/en/security-intelligence-service/corporate/publications/csis-public-report-2023/partner-focused.html#toc10. Accessed 15 Oct. 2025.

²⁵⁴ National Defence. “Line of Effort 3: Ethics, Safety, and Trust - Canada.ca.” Canada.ca, 2024, www.canada.ca/en/department-national-defence/corporate/reports-publications/dnd-caf-artificial-intelligence-strategy/line-of-effort-3.html. Accessed 15 Oct. 2025.

²⁵⁵ “Platform One.” P1.Dso.mil, p1.dso.mil.

²⁵⁶ “Platform One.” Dso.mil, 2025, p1.dso.mil/partybus. Accessed 12 Oct. 2025.

²⁵⁷ “Canadian Data Governance Standardization Roadmap.” Standards Council of Canada, 28 June 2021, scc-ccn.ca/system/files/2024-05/scc_data_gov_roadmap_en.pdf. Accessed 9 Oct. 2025.

²⁵⁸ National Defence. “Department of National Defence Indigenous Reconciliation Program - Grants and Contributions - Canada.ca.” Canada.ca, 2023, www.canada.ca/en/department-national-defence/programs/indigenous-reconciliation-funding.html.

²⁵⁹ National Defence. “DAOD 4004-0, Indigenous Affairs - Canada.ca.” Canada.ca, 2025, www.canada.ca/en/department-national-defence/corporate/policies-standards/defence-administrative-orders-directives/4000-series/4004/4004-0-indigenous-affairs.html.

²⁶⁰ European Parliament. “EU AI Act: First Regulation on Artificial Intelligence.” European Parliament, 19 Feb. 2025, www.europarl.europa.eu/topics/en/article/20230601STO93804/en-ai-act-first-regulation-on-artificial-intelligence.

²⁶¹ “Security & Prosperity | Business Council of Canada.” Business Council of Canada, 18 Sept. 2025, www.thebusinesscouncil.ca/report/security-and-prosperity.

²⁶² Office, Privy Council. “Major Projects Office - Canada.ca.” Canada.ca, 2025, www.canada.ca/en/privy-council/major-projects-office.html. Accessed 15 Oct. 2025.

Education and Skills

What skills are required for a modern, digital economy, and how can Canada best support their development and deployment in the workforce?

Barrier-free programs and services must not discriminate against intelligence²⁶³, or cultural groups. We identify cybersecurity²⁶⁴, critical thinking²⁶⁵, empathy²⁶⁶, and transversal²⁶⁷ creativity²⁶⁸, as bedrock skills for a modern, digital²⁶⁹ economy. Canada must develop the growing demand of AI skills and competencies²⁷⁰ in tandem with these bedrock skills at a low-cost – in comparison with government courses²⁷¹ which are free for public servants. With lower competency scores in IT²⁷² and AI, First Nations stand to gain the most from these solutions.

With deep knowledge of AI frameworks, standards, regulations, norms, disclosures, ontologies and taxonomies; Robson has pledged to work towards the creation of Indigenous workforce development pathways; creating skilled Indigenous participation in defence technology. We pride ourselves in upskilling First Nations peoples in digital literacy, continuous improvement, information and data stewardship, digital responsibility, and cyber security vigilance.

How can we enhance AI literacy in Canada, including awareness of AI's limitations and biases?

Given the competencies to communicate with, use, and critically evaluate AI technologies²⁷³; we can make the most poignant impact with AI literacy with Indigenous perspectives – ISED must prioritize this inclusion²⁷⁴. Without First Nations participation, inclusion, and consultation; Canadian AI is inherently discriminatory. Reports are now emerging as a red flag to sovereignty²⁷⁵ – we have, for years, enacted legislature against the

²⁶³ Branch, Legislative Services. "Consolidated Federal Laws of Canada, Accessible Canada Act." *Laws-Lois.justice.gc.ca*, 11 July 2019, laws-lois.justice.gc.ca/eng/acts/A-0.6/page-1.html.

²⁶⁴ Canada, Public Safety. "Canada's National Cyber Security Strategy: Securing Canada's Digital Future." *Publicsafety.gc.ca*, 2022, www.publicsafety.gc.ca/cnt/rsrscs/pblctns/ntnl-cbr-scrty-strtg-2025/index-en.aspx. Accessed 16 Oct. 2025.

²⁶⁵ The Knowledge Gap: Canada Faces a Shortage in Digital and STEM Skills – C.D. Howe Institute." C.D. Howe Institute, 23 Aug. 2022, cdhowe.org/publication/knowledge-gap-canada-faces-shortage-digital-and-stem-skills-0.

²⁶⁶ Canada. "Digital Competency Series: Understanding Digital Literacy (DDN2-A51) - CSPS." *Csps-Efpc.gc.ca*, 2024, www.csps-efpc.gc.ca/tools/articles/understanding-digital-literacy-eng.aspx.

²⁶⁷ Arney, Noah. "What You Need to Know about Canada's New Skills for Success Framework." *CareerWise*, 28 June 2021, careerwise.cerpc.ca/2021/06/28/what-you-need-to-know-about-canadas-new-skills-for-success-framework. Accessed 16 Oct. 2025.

²⁶⁸ and, Communications. "An Inclusive Innovation Agenda: The State of Play." *Canada.ca*, 5 Aug. 2016, ised-isde.canada.ca/site/innovation-better-canada/en/long-read/inclusive-innovation-agenda-state-play. Accessed 16 Oct. 2025.

²⁶⁹ "The Skills Algorithm: Digital Skills Demand across Canada's Labour Market." *The Dais*, 8 Nov. 2023, dais.ca/reports/the-skills-algorithm-digital-skills-demand-across-canadas-labour-market.

²⁷⁰ Todd Legere, Sheldon Lopez, and Noah Lubendo. Canada's AI Ecosystem: A Brief Overview of In-Demand Skills and Trends. Information and Communications Technology Council (ICTC), February 2025. Ottawa, Canada.

²⁷¹ Canada, Establishment. "Learning Hub - Canadian Centre for Cyber Security." *Canadian Centre for Cyber Security*, 2024, www.cyber.gc.ca/en/education-community/learning-hub.

²⁷² Maslov, Alexander, and Jianwei Zhong. "Skill Mismatch of Indigenous Peoples in Canada: Findings from PIAAC." *Canadian Public Policy*, vol. 48, no. 1, 1 Mar. 2022, pp. 91–107, <https://doi.org/10.3138/cpp.2020-100>.

²⁷³ Duri Long and Brian Magerko, "What Is AI Literacy? Competencies and Design Considerations," *Proceedings of the 2020 CHI Conference on Human Factors in Computing Systems*, 2020, <https://doi.org/10.1145/3313831.3376727>.

²⁷⁴ Government of Canada. "Learning Together for Responsible Artificial Intelligence." *Ised-Isde.canada.ca*, 3 Mar. 2023, ised-isde.canada.ca/site/advisory-council-artificial-intelligence/en/public-awareness-working-group/learning-together-responsible-artificial-intelligence.

²⁷⁵ Verma, Sonia. "Researcher Tackles Discrimination and Inherent Bias in AI Systems." *McMaster News*, 8 May 2025, news.mcmaster.ca/mariam-ghasemaghaei-canada-research-chair-tackles-discrimination-inherent-bias-in-ai-systems. Accessed 16 Oct. 2025.

theft and misappropriation²⁷⁶ of Canadian content²⁷⁷. We pride ourselves on a system that is not racist; If AI ethics is CSR-greenwashed, Canada will have foregone its **raison d'être**.

Canada can benefit from producing awareness of limitations in computational logic and bias. If our government can enforce legislature; we can red-flag limitations, biases, and violations. One missing link is taking advantage of logic in legislation to uphold Canada's legislature with conceptual graphs²⁷⁸; an ISO²⁷⁹ standard for "Common Logic".

What can Canada do to ensure equitable access to AI literacy across regions, demographics and socioeconomic groups?

Admittedly; systemic AI discrimination²⁸⁰ and operationalization of bias against non-white, non-male, and non-Western peoples²⁸¹ must be excised with DEI principles²⁸² and novel perspectives of Indigenous epistemology²⁸³. In areas where First Nations do not have adequate access to internet, the knowledge gap is growing²⁸⁴, thus, we must co-design and culturally appropriate service delivery²⁸⁵. Toward equality and well-being²⁸⁶; we must integrate the Accessibility Standards Canada database²⁸⁷ with linked data directives²⁸⁸ to uphold the Accessible Canada Act in programmatic enforcement. Our nation prides itself on machine-translatable services in Canadian English¹⁰ and Québécois French¹¹, yet falls short of providing services to First Nations in Indigenous Languages¹². Sceptics of tools like GCTranslate²⁸⁹ must be able to view and audit its inner workings. Citizens must be able to engage with, and contribute to, open-source human-interfacing tools to endow federally accepted and legislated concepts of linguistics¹³, with annotated perspectives providing expertise²⁹⁰ in semantics.

Canada must bridge the "Digital Divide"²⁹¹ of AI literacy by combining universal access with grades K-12 and post-secondary curriculum integration in order to close the gap

²⁷⁶ Government of Canada, Canadian Radio-television and Telecommunications Commission (CRTC). "Regulatory Plan to Modernize Canada's Broadcasting System." Crtc.gc.ca, 8 May 2023, crtc.gc.ca/eng/industry/modern/plan.htm.

²⁷⁷ Government of Canada, Canadian Radio-television and Telecommunications Commission (CRTC). "Content Made by Canadians." Crtc.gc.ca, 5 Dec. 2008, crtc.gc.ca/eng/cancon.htm.

²⁷⁸ Chein, Michel, and Marie-Laure Mugnier. "Conceptual Graphs: Fundamental Notions." ResearchGate, vol. 6, no. 4, Nov. 1998, www.researchgate.net/publication/2802495_Conceptual_Graphs_fundamental_notions. Accessed 16 Oct. 2025.

²⁷⁹ for, Organization. "ISO/IEC 24707:2018." ISO, 2018, www.iso.org/standard/66249.html.

²⁸⁰ O'Gorman, Marcel. "At the heart of artificial intelligence is racism and colonialism that we must excise." Globe and Mail web edition, 4 July 2023. Gale Academic OneFile, link.gale.com/apps/doc/A769514642/AONE. Accessed 16 Oct. 2025.

²⁸¹ Lewis, Jason Edward, et al. "Abundant Intelligences: Placing AI within Indigenous Knowledge Frameworks." AI & Society, 19 Oct. 2024, <https://doi.org/10.1007/s00146-024-02099-4>.

²⁸² Service, Canadian Security Intelligence. "CSIS Diversity, Equity and Inclusion Strategy 2022." Wwww.canada.ca, 27 Mar. 2023, www.canada.ca/en/security-intelligence-service/corporate/publications/csis-diversity-equity-and-inclusion-strategy-2022.html.

²⁸³ "Social Sciences and Humanities Research Council." Canada.ca, 21 June 2023, sshrc-crsh.canada.ca/funding-financement/nfrf-fnfr/stories-histoires/2023/inclusive_artificial_intelligence-intelligence_artificielle_inclusive-eng.aspx.

²⁸⁴ Assembly of First Nations. "The Digital Connectivity Gap - Assembly of First Nations." Assembly of First Nations, 5 Apr. 2024, afn.ca/economy-infrastructure/infrastructure/closing-the-infrastructure-gap/digital-connectivity.

²⁸⁵ Canada; "Accessibility Plan at Indigenous Services Canada (ISC)." Sac-Iscc.gc.ca, 2019, www.sac-isc.gc.ca/eng/1669992796447/1669992819201.

²⁸⁶ Government of Canada. "Canadian Charter of Rights and Freedoms." Laws-Lois.justice.gc.ca, Government of Canada, 1982, laws-lois.justice.gc.ca/eng/Const/page-12.html.

²⁸⁷ "Standards and Technical Guides Database - Accessibility Standards Canada." Canada.ca, 2025, accessible.canada.ca/standards-and-technical-guides-database. Accessed 10 Oct. 2025.

²⁸⁸ Canada, Service. "Linked Open Data Overview - Canada.ca." Canada.ca, 2019, www.canada.ca/en/services/culture/history-heritage/museology-conservation/collections-management/linked-open-data/linked-open-data-overview.html. Accessed 9 Oct. 2025.

²⁸⁹ Public. "GCTranslate: Using Artificial Intelligence to Build a More Agile, Modern and Bilingual Public Service." Canada.ca, Government of Canada, 29 Sept. 2025, www.canada.ca/en/public-services-procurement/news/2025/09/gctranslate-using-artificial-intelligence-to-build-a-more-agile-modern-and-bilingual-public-service.html. Accessed 27 Oct. 2025.

²⁹⁰ "Future Skills Centre • Centre Des Compétences Futures." Fsc-cfc.ca, 2024, fsc-cfc.ca/research/ai-and-future-skills.

²⁹¹ Canada. "Bridging the Gap: Unraveling the Digital Divide (DDN2-A26) - CSPP." Cspc-Efpc.gc.ca, 2024, www.cspc-efpc.gc.ca/tools/articles/digital-divide-eng.aspx.

of digital inequality²⁹², employer-supported credentials²⁹³, internships, and publicly funded AI labs²⁹⁴. Our government shall educate Canadians with transparent systems that indicate bias and limitation in identifying areas of “hope” and “fear”²⁹⁵. Unfortunately, national measurements to track this progress are hindered by lack of accessibility, digital infrastructure, time, competing commitments, language accommodation, resources, and community partners²⁹⁶; we expect and recommend continued efforts by StatsCan to address and resolve these issues²⁹⁷.

²⁹² Government of Canada, Statistics Canada. “Internet-Use Typology of Canadians: Online Activities and Digital Skills.”

Www150.Statcan.gc.ca, 9 Nov. 2021, www150.statcan.gc.ca/n1/pub/11f0019m/11f0019m2021008-eng.htm.

²⁹³ and, Employment. “Explore Diverse Training Opportunities to Find the Ideal Fit for Your Career Growth - Job Bank.” Jobbank.gc.ca, 2025, www.jobbank.gc.ca/career-planning/resources/training-opportunities-career-growth. Accessed 16 Oct. 2025.

²⁹⁴ Canada. “Learning Together for Responsible Artificial Intelligence: Report of the Public Awareness Working Group.: Iu173-38/2022E-PDF - Government of Canada Publications - Canada.ca.” Publications.gc.ca, 2022, publications.gc.ca/site/eng/9.907067/publication.html. Accessed 16 Oct. 2025.

²⁹⁵ and, Communications. “Views of Canadians on Artificial Intelligence: Executive Summary - Public Opinion Research.” Canada.ca, 25 May 2021,

iscd-isde.canada.ca/site/public-opinion-research/en/views-canadians-artificial-intelligence-executive-summary. Accessed 16 Oct. 2025.

²⁹⁶ “Learning Together for Responsible Artificial Intelligence.” Canada.ca, 28 Nov. 2024,

iscd-isde.canada.ca/site/advisory-council-artificial-intelligence/en/public-awareness-working-group/learning-together-responsible-artificial-intelligence#6.4. Accessed 16 Oct. 2025.

²⁹⁷ Government of Canada, Statistics Canada. “Statistics Canada Data Strategy.” Www.statcan.gc.ca, 13 Mar. 2020, www.statcan.gc.ca/en/about/datastrategy.

Building Enabling Infrastructure

Which infrastructure gaps (compute, data, connectivity) are holding back AI innovation in Canada, and what is stopping Canadian firms from building sovereign infrastructure to address them?

Canada lags all other G7 countries in AIC infrastructure²⁹⁸ – 90% of Canadian businesses see remote areas as a key concern to advance innovation²⁹⁹. Data centre owners are keen to skirt impact assessments and Indigenous consultation, infringing on Canadian treaty rights³⁰⁰. Sensitive data requires strict³⁰¹ sovereignty measures; Robson is positioned to provide distributed, lawful enterprise trust for mission-critical workloads in remote environments – mitigating risk and contributing to socioeconomic justice.

There are high costs and risks associated with building sovereign infrastructure; monthly GPU compute costs in Telus' Rimouski, QC datacentre can be up to 10x the costs compared to AWS' Montreal elastic-compute instances. Without the talent nor demand to drive datacentres in cheaper regions³⁰², businesses may find investments risky. Land and power abundance are contested by First Nations impact assessments; traditionally perceived as barriers to capitalization. Thus, we must work together toward prosperity and self-determination. A sovereign data and infrastructure solution can involve accessible, programmatic reconciliation in the low-carbon economy³⁰³ – including sovereign-based, green transportation plans³⁰⁴. Canada must prioritize First Nations-led infrastructure development³⁰⁵ designed to deploy responsible, low-SWaP computing. Robson recommends the provisioning of Indigenous training, support, and clean-energy solutions with its Emily AI OS Platform for these facilities; using First Nations principles in concert with skilled Indigenous participation.

How can we ensure equitable access to AI infrastructure across regions, sectors and users (researchers, start-ups, SMEs)?

To combat market inefficiencies, Canada is well-positioned to distribute shared public-compute allocations for research and AI-funded³⁰⁶ SMEs. However, lack of clarity about future AI demand³⁰⁷ – and business uptake – is a cause for investment concern. Cost, skill shortages,

²⁹⁸ “Can Canada Compute? Policy Options to Close Canada’s AI Compute Gap.” The Dais, 20 Mar. 2024. dais.ca/reports/can-canada-compute.

²⁹⁹ Ericsson. “Nine out of 10 Canadian Businesses Believe Connectivity Is Key to Advancing Innovation and Competitiveness.” Ericsson.com, Ericsson, 17 June 2025. www.ericsson.com/en/news/2025/6/nine-out-of-10-canadian-businesses-believe-connectivity-is-key-to-advancing-innovation-and-competitiveness. Accessed 16 Oct. 2025.

³⁰⁰ Kabi Moulitharan. “First Nation Voices Concern over Proposed AI Data Centre in Northern Alberta.” Global News, 18 Jan. 2025. globalnews.ca/news/10961315/ai-data-centre-first-nation-concerns. Accessed 4 Mar. 2025.

³⁰¹ Statistics Canada. Table 22-10-0076-01 Types of cyber security incidents that impact enterprises by industry and size of enterprise.

³⁰² Talukder, Shiplu. “Bridging the Imagination Gap: How Canadian Companies Can Become Global Leaders in AI Adoption.” RBC, 24 June 2025. www.rbc.com/en/thought-leadership/the-growth-project/bridging-the-imagination-gap-how-canadian-companies-can-become-global-leaders-in-ai-adoption. Accessed 16 Oct. 2025.

³⁰³ and, Environment. “The Government of Canada Is Supporting 13 Indigenous-Led Clean Energy Projects through the Low Carbon Econo...” Canada.ca, Government of Canada, 8 July 2025.

www.canada.ca/en/environment-climate-change/news/2025/07/the-government-of-canada-is-supporting-13-indigenous-led-clean-energy-projects-through-the-low-carbon-economy-funds-indigenous-leadership-fund.html.

³⁰⁴ Transport Canada. “Transportation 2030: Green and Innovative Transportation.” Canada.ca, 25 Nov. 2019. tc.canada.ca/en/corporate-services/transportation-2030-green-innovative-transportation.

³⁰⁵ Zhao, Emma. “Indigenous-Led Data Centre in Alberta Slated for Development amid AI Infrastructure Boom.” CBC, 16 July 2025. www.cbc.ca/news/canada/edmonton/first-indigenous-data-centre-abandoned-power-plant-1.7586072.

³⁰⁶ “AI Compute Access Fund.” Canada.ca, 6 May 2025. iscd-isde.canada.ca/site/iscd/en/canadian-sovereign-ai-compute-strategy/ai-compute-access-fund.

³⁰⁷ Noffsinger, Jesse, et al. “The Cost of Compute: A \$7 Trillion Dollar Race to Scale Data Centers.” McKinsey & Company, 28 Apr. 2025. www.mckinsey.com/industries/technology-media-and-telecommunications/our-insights/the-cost-of-compute-a-7-trillion-dollar-race-to-scale-data-centers.

and lack of technical onboarding³⁰⁸ creates barriers to entry for new entities³⁰⁹. In addition; equitable social access must also be considered. As a counterbalance, Canada is poised to make one of the most impactful socioeconomic investments of our time.

With the understanding that First Nations principles have strengthened culture, well-being, and self-determination since time immemorial; Canada must regard Indigenous socioeconomic investment as a long-term hedge to unethical and risky AI zeitgeist. Robson's recommendation is for Canada to champion next-generation advanced technologies³¹⁰; photonics, quantum, and low-SWaP semiconductor AI infrastructures, in marginalized communities fraught with below-average infrastructure

This strategy will strengthen Indigenous knowledge systems, environmental resilience, support for data-sovereign infrastructure and provide First Nations with cutting-edge technological skills. We also stand to gain rural, strengthened emergency safety systems³¹¹ to build community resilience, security and sovereign compute at the tactical edge³¹² and northern³¹³ frontier (ISR/C2); ecological threat monitoring³¹⁴ and Arctic mission advances³¹⁵; and more. We can ensure future-proof, equitable Indigenous North American AI infrastructure, fusing security with intelligent reinforcement.

How much sovereign AI compute capacity will we need for our security and growth, and in what formats?

The gap of 10% of global AI researchers³¹⁶ versus 0.7% of global FLOPS³¹⁷ in the scope of AI calls for a 10x high-performance compute scale-up and a new national host site³¹⁸ at the exaflop scale in line global ratios and the Sovereign Cloud Initiative³¹⁹. Robson encourages a national dashboard to be created for total compute capacity in line with business due diligence objectives. Our recommendations for scale-up in compute capacity as follows:

³⁰⁸ Government of Canada. "Government of Canada Launches Second Phase of the Pan-Canadian Artificial Intelligence Strategy." www.canada.ca, 22 June 2022, www.canada.ca/en/innovation-science-economic-development/news/2022/06/government-of-canada-launches-second-phase-of-the-pan-canadian-artificial-intelligence-strategy.html.

³⁰⁹ "Competition Bureau Canada Publishes Report on Artificial Intelligence (AI) – CHG 2025." Capital Hill Group, 30 Jan. 2025, capitalhillgroup.ca/competition-bureau-canada-publishes-report-on-artificial-intelligence-ai. Accessed 16 Oct. 2025.

³¹⁰ "MIT Solve." Mit.edu, 2025, solve.mit.edu/solutions/95048. Accessed 16 Oct. 2025.

³¹¹ celsocercado. "AFN National Chief Addresses First Nations Policing and Justice Reform with Ministers Responsible for Justice and Public Safety - Assembly of First Nations." Assembly of First Nations, 15 Oct. 2025, afn.ca/all-news/press-releases/afn-national-chief-addresses-first-nations-policing-and-justice-reform-with-ministers-responsible-for-justice-and-public-safety. Accessed 16 Oct. 2025.

³¹² "NATO STO IST-193 Edge Computing at the Tactical Edge." Fraunhofer Institute for Communication, Information Processing and Ergonomics FKIE, 2019, www.fkie.fraunhofer.de/en/press-releases/nato-sto-ist-193.html. Accessed 16 Oct. 2025.

³¹³ Government of Canada; Crown-Indigenous Relations and Northern Affairs Canada. "Arctic and Northern Policy Framework: Safety, Security, and Defence Chapter." Rcaanc-Cirnac.gc.ca, 2017, www.rcaanc-cirnac.gc.ca/eng/1562939617400/1562939658000.

³¹⁴ Canada, National Research Council. "Internet of Things: Quantum Sensors Challenge Program." Nrc.canada.ca, 24 Sept. 2020, nrc.canada.ca/en/research-development/research-collaboration/programs/internet-things-quantum-sensors-challenge-program.

³¹⁵ Canada; "Arctic and Northern Policy Framework: Safety, Security, and Defence Chapter." Rcaanc-Cirnac.gc.ca, 2017, www.rcaanc-cirnac.gc.ca/eng/1562939617400/1562939658000#chp5. Accessed 16 Oct. 2025.

³¹⁶ "Consultations on Artificial Intelligence (AI) Compute." Canada.ca, 5 Dec. 2024, ISED-ISCDCANADA.ca/site/ISED/en/public-consultations/consultations-artificial-intelligence-ai-compute.

³¹⁷ "Can Canada Compute? Policy Options to Close Canada's AI Compute Gap." The Dais, 20 Mar. 2024, dais.ca/reports/can-canada-compute.

³¹⁸ "National Host Sites." Alliancecan.ca, 2023, www.alliancecan.ca/en/our-services/advanced-research-computing/national-host-sites. Accessed 16 Oct. 2025.

³¹⁹ "Canada's Sovereign Cloud Initiative - CCIA." CCIA, 29 Sept. 2025, ccianet.org/library/canadas-sovereign-cloud-initiative. Accessed 16 Oct. 2025.

Table 4.

Compute capacity, models, and use-cases for Canadian security, sovereignty, and growth.

Tier / Target Capacity (PetaFLOPS)	Primary Use Case	Security & Sovereignty	Indigenous Growth	Formats / Models
500	National AI research, advanced simulations ³²⁰	Protects sensitive datasets, supports GC/CSE secure workload	Enables indigenous data residence and governance alignment under OCAP/UNDRIP	National clusters
1000	Sovereign ³²¹ ISR, epistemology, defence, major projects & infrastructure, R&D	National datacenter with First Nations support	Supports creation of IKR for languages, land use, climate resilience	Canadian-located supercomputer
50-100	Regional/edge, SME, community, health & education	Distributed nodes for enhanced rural security	Indigenous-led digital infrastructure and community governance	Micro-data centres
0-100 (Elastic)	Secure; Up to Protected B/C commercial hosting	Certified for public and private sectors	Enables trusted partnerships for indigenous businesses to scale & deliver	Cloud ³²² zones, GC security-compliant

According to ISED; 11 of 19 surveyed Indigenous organizations³²³ raised concerns about ensuring data sovereignty, local infrastructure, affordable and secure compute infrastructure, and access to support innovation, privacy, and business growth. Our duty to consult and upholding of reconciliation with self-determination must be sustained.

Robson delivers exclusive, compliant sovereign hardware solutions – trusted by commercial and government entities. Our HPC and storage solutions are ready for large-scale defence datasets with support for modelling, mission planning, sensor fusion, and autonomous systems, deployable anywhere and capable of parallel distributed computation. Our alignment with Indigenous Participation Plans assures compliance with flexible engagement models. In line with Canada’s mission to increase compute; we are seeking partnerships with Canadian companies to deploy secure sovereign cloud and HPC solutions for defence programs, with compliance-ready solutions.

³²⁰ “Consultations on Artificial Intelligence (AI) Compute.” Canada.ca, 5 Dec. 2024,

ised-isde.canada.ca/site/ised/en/public-consultations/consultations-artificial-intelligence-ai-compute.

³²¹ “AI Compute Access Fund.” Canada.ca, 6 May 2025,

ised-isde.canada.ca/site/ised/en/canadian-sovereign-ai-compute-strategy/ai-compute-access-fund.

³²² “Cloud Adoption Strategy: 2023 Update.” Www.canada.ca, 18 Jan. 2023,

www.canada.ca/en/government/system/digital-government/digital-government-innovations/cloud-services/cloud-adoption-strategy-2023-update.html.

³²³ “What We Heard Report: Consultations on AI Compute.” Canada.ca, 5 Dec. 2024,

ised-isde.canada.ca/site/ised/en/what-we-heard-report-consultations-ai-compute.

Security of the Canadian Infrastructure and Capacity

What are the emerging security risks associated with AI, and how can Canada proactively mitigate future threats?

Half of Canada³²⁴ is openly concerned with emerging security risks from AI with 30% of organizations unprepared³²⁵ and experiencing loss of revenue from adversarial techniques such as phishing, disinformation, and deepfakes³²⁶. We must defend from foreign cyber operations against espionage, IP theft, malign, and repression³²⁷; harm and bias³²⁸. Sovereign AI needs to be positioned for mission assurance in compliance with ITB³²⁹ policy and in-line with defence and intelligence frameworks³³⁰ to meet global obligations on-demand and enhance Canada's industrial base. Proactivity involves non-voluntary audit³³¹ of compliance in strong authentication³³², threat detection, security, logging, and training. Canadian businesses can lean on ex-CSE cyber specialists for endpoint detection and cyber defence platforms³³³ such as SNOW to mitigate adversarial risks and provide ongoing contributions to national AI reports³³⁴.

It is imperative that Canadians implement³³⁵ Centre for Cyber Security³³⁶ guidance. Canada's Bill C-26³³⁷ concerns cyber security but lacks a codified framework for easy implementation such as an AI Software Development Kit (AISDK). Canada must operationalize its own development and security operations (DevSecOps) platform as a proactive framework for developers and develop in concert with National tooling; binding technical baselines for evaluation, testing, provenance, and model-auditing with federal procurement and certification processes, alike to NIST³³⁸ – but rooted in Canadian legislature.

Proactive measures should involve an Accessible Instrument for guarding security policies and statutory privacy regimes, in logical fashion, for automated pen testing and reporting of high-risk systems. We must hold to high standard a content-credentialing and

³²⁴ “New Poll Finds That Half of Canadians Are Concerned about Generative Artificial Intelligence and the Spread of Misinformation – CIRA.” CIRA, 10 July 2024, www.cira.ca/en/resources/news/state-of-internet/new-poll-finds-that-half-of-canadians-are-concerned-about-generative-artificial-intelligence-and-the-spread-of-misinformation/.

³²⁵ Ibid

³²⁶ Canada, Establishment. “Communications Security Establishment Canada Releases 2025 Update to Report on Cyber Threats to Canada’s De...” Canada.ca, Government of Canada, 6 Mar. 2025, www.canada.ca/en/communications-security/news/2025/03/communications-security-establishment-canada-releases-2025-update-to-report-on-cyber-threats-to-canadas-democratic-process.html

³²⁷ Government of Canada. “National Cyber Threat Assessment 2025-2026 - Canadian Centre for Cyber Security.” Canadian Centre for Cyber Security, 2024, www.cyber.gc.ca/en/guidance/national-cyber-threat-assessment-2025-2026.

³²⁸ “C-27 (44-1) - LEGISinfo - Parliament of Canada.” Wwww.parl.ca, www.parl.ca/LegisInfo/en/bill/44-1/C-27.

³²⁹ Government of Canada, Innovation. “Industrial and Technological Benefits - Home.” Ised-Isde.canada.ca, 27 Sept. 2022, ised-isde.canada.ca/site/industrial-technological-benefits/en.

³³⁰ Canada; “Procurement Strategy for Indigenous Business Compliance Audit Information.” Sac-Isd.gc.ca, 2024, www.sac-isd.gc.ca/eng/1407949234714/1610985664338.

³³¹ Canada, Infrastructure. “Housing, Infrastructure and Communities Canada - Internal Audit of the Cyber Security Framework - June 2024.” Canada.ca, 2024, housing-infrastructure.canada.ca/pd-dp/ia-vi/framework-cyber-sec-cadre-eng.html. Accessed 16 Oct. 2025.

³³² Security, Canadian Centre for Cyber. “Steps for Effectively Deploying Multi-Factor Authentication (MFA) - ITSAP.00.105.” Canadian Centre for Cyber Security, 23 May 2023, www.cyber.gc.ca/en/guidance/steps-effectively-deploying-multi-factor-authentication-mfa-itsap00105.

³³³ “Company | Arc4dia.” Netlify.app, 2017, arc4diademo.netlify.app/company. Accessed 16 Oct. 2025.

³³⁴ “Artificial Intelligence at Statistics Canada.” Wwww.statcan.gc.ca, www.statcan.gc.ca/en/trust/collecting-your-data/artificial-intelligence.

³³⁵ BDO Canada LLP. “Cybersecurity and Bill C-26: How to Comply with Confidence.” BDO Canada, 19 Apr. 2023, www.bdo.ca/insights/cybersecurity-and-bill-c-26-how-to-comply-with-confidence. Accessed 16 Oct. 2025.

³³⁶ Government of Canada. “Canadian Centre for Cyber Security.” Canadian Centre for Cyber Security, 28 Oct. 2022, www.cyber.gc.ca/en.

³³⁷ “Government Bill (House of Commons) C-26 (44-1) - First Reading - an Act Respecting Cyber Security, Amending the Telecommunications Act and Making Consequential Amendments to Other Acts - Parliament of Canada.” Wwww.parl.ca, www.parl.ca/DocumentViewer/en/44-1/bill/C-26/first-reading.

³³⁸ NIST. “AI Risk Management Framework.” Artificial Intelligence Risk Management Framework (AI RMF 1.0), vol. 1, no. 1, Jan. 2023, nvlpubs.nist.gov/nistpubs/ai/NIST.AI.100-1.pdf, <https://doi.org/10.6028/nist.ai.100-1>.

media provenance³³⁹ system that explicitly incorporate Indigenous impact assessments; such that data residency, consent, stewardship, and benefit-sharing are legally and judiciously enforced – protecting communities while enabling secure, socioeconomic equality. If we allow gaps to form in systematic enforcement of rules for infrastructure in industries such as banks – especially with First Nations – there will be cases³⁴⁰ of crime and terrorism³⁴¹.

As a technical practice; open-source solutions from OWASP³⁴² and SCAP³⁴³ such as Anchore³⁴⁴ Snyk³⁴⁵ and Grype³⁴⁶ orchestrate, for example; OSS and Dependency Management, supply chain hardening, and static/dynamic application security testing (SAST/DAST)³⁴⁷. Robson recommends secure AI model auditing and provides a trust layer for AI systems. Transparency, security, and compliance with autonomous orchestration and human-machine teaming will yield sensitive and regulated defence environments. The G7 mandate of cooperation on cyber security, fostering long-term resilience, and promoting dialogue³⁴⁸ must be openly materialized, multilaterally, with agencies such as CISA³⁴⁹ and OWASP.

How can Canada strengthen cybersecurity and safeguard critical infrastructure, data and models in the age of AI?

As part of the Cybersecurity Transition Binder³⁵⁰; Canada must accelerate the development of Cyber Attribution technologies – one of the most challenging problems in cyberspace³⁵¹ – to probe whether “Artificial Intelligence and Big Data Technologies”³⁵² and “Advanced Digital Infrastructure Technologies”³⁵³ are a threat to Public Safety Canada’s³⁵⁴ critical national infrastructure³⁵⁵ strategy³⁵⁶. This requires an updated acid-test of “intelligence” with respect to Canadian copyright³⁵⁷ and attribution³⁵⁸. This test must be part of programmatic evaluation and CI/CD Instrumentation of risk management with synthetic³⁵⁹

³³⁹Operational Standard for Digital Archival Records’ Metadata - Canada.ca.” *Canada.ca*, 2023,

www.canada.ca/en/library-archives/services/government/information-disposition/management/guidelines/operational-standard-digital-archival-records-metadata.html.

³⁴⁰ Warren, Jeremy. “Fintrac Issues \$600K Fine to First Nations Bank of Canada.” CBC, 16 Oct. 2025, www.cbc.ca/news/canada/saskatchewan/first-nations-bank-fintrac-fine-9.6941377. Accessed 19 Oct. 2025.

³⁴¹ Branch, Legislative Services. “Consolidated Federal Laws of Canada, Proceeds of Crime (Money Laundering) and Terrorist Financing Act.” Laws-Lois.justice.gc.ca, 22 June 2023, laws-lois.justice.gc.ca/eng/acts/P-24.501/.

³⁴² OWASP. “Source Code Analysis Tools | OWASP.” *Owasp.org*, 2021, owasp.org/www-community/Source_Code_Analysis_Tools.

³⁴³ Home | OpenSCAP Portal. www.open-scap.org/.

³⁴⁴ “Anchore, Inc.” GitHub, 16 Oct. 2025, github.com/anchore. Accessed 16 Oct. 2025.

³⁴⁵ Snyk. “Snyk | Developer Security | Develop Fast. Stay Secure.” *Snyk.io*, snyk.io.

³⁴⁶ “Grype | CISA.” Cybersecurity and Infrastructure Security Agency CISA, 2025, www.cisa.gov/resources-tools/services/grype. Accessed 24 Oct. 2025.

³⁴⁷ Static Application

³⁴⁸ Canada, Establishment. “Chairs’ Statement on G7 Cybersecurity Working Group Meeting - Canadian Centre for Cyber Security.”

Canadian Centre for Cyber Security, 2025, www.cyber.gc.ca/en/news-events/chairs-statement-g7-cybersecurity-working-group-meeting. Accessed 16 Oct. 2025.

³⁴⁹ “A Shared Vision of Software Bill of Materials (SBOM) for Cybersecurity | CISA.” Cybersecurity and Infrastructure Security Agency CISA, 3 Sept. 2025, www.cisa.gov/resources-tools/resources/shared-vision-software-bill-materials-sbom-cybersecurity.

³⁵⁰ Public Safety Canada. “Transition Binder: Cyber Security.” <https://www.publicsafety.gc.ca/cnt/trnspmc/brfng-mtrls/trnstr-bndrs/20250422/05-en.aspx>, 22 April, 2025.

³⁵¹ National Defence. “Cyber Attribution for the Defence of Canada - Canada.ca.” *Canada.ca*, 2024,

www.canada.ca/en/department-national-defence/programs/defence-ideas/element/competitive-projects/challenges/cyber-attribution-for-the-defence-of-canada.html. Accessed 17 Oct. 2025.

³⁵² “Sensitive Technology Research Areas.” *Science.gc.ca*, 23 Sept. 2024, science.gc.ca/site/science/en/safeguarding-your-research/guidelines-and-tools-implement-research-security/sensitive-technology-research-and-affiliations-concern/sensitive-technology-research-areas.

³⁵³ Ibid

³⁵⁴ “Critical Infrastructure.” *Publicsafety.gc.ca*, 2019, www.publicsafety.gc.ca/cnt/ptnl-sert/crtcl-nfrstrctr/index-en.aspx.

³⁵⁵ Public Safety Canada. “Canada’s Critical Infrastructure.” *Www.publicsafety.gc.ca*, 19 May 2020, www.publicsafety.gc.ca/cnt/ptnl-sert/crtcl-nfrstrctr/cji-icc-en.aspx.

³⁵⁶ Canada, Public Safety. “National Strategy for Critical Infrastructure.” *Www.publicsafety.gc.ca*, 21 Dec. 2018, www.publicsafety.gc.ca/cnt/rscs/pblctns/srfg-crtcl-nfrstrctr/index-en.aspx.

³⁵⁷ Branch, Legislative Services. “Copyright Act.” *Justice.gc.ca*, 2025, laws-lois.justice.gc.ca/eng/acts/C-42/page-14.html#docCont. Accessed 17 Oct. 2025.

³⁵⁸ Government of Canada, Innovation. “Copyright – Learn the Basics Protect Your Original Works. Learn Why Copyright Matters.” *Ised-Isde.canada.ca*, 15 Sept. 2022,

ised-isde.canada.ca/site/canadian-intellectual-property-office/en/copyright-learn-basics/copyright-learn-basics-protect-your-original-works-learn-why-copyright-matters.

³⁵⁹ “Research Agenda on Risks from Synthetic Content.” *Canada.ca*, 14 July 2025, ised-isde.canada.ca/site/ised/en/canadian-artificial-intelligence-safety-institute/research-agenda-risks-synthetic-content. Accessed 17 Oct. 2025.

data-and-model provenance graphs³⁶⁰ crawl for persistent threat³⁶¹ analysis. If this is not performed, persistent cybercrime³⁶² and likely attacks³⁶³ against businesses and law enforcement³⁶⁴ will incur more than \$1bn in expenses in 2028³⁶⁵. We have also seen direct attacks on infrastructure and hardware³⁶⁶ that can be mitigated with novel Canadian systems for both hardware and software³⁶⁷. Canada needs to produce these systems with sovereign facilities – other than shipbuilding³⁶⁸ – for low-SWaP AI solutions.

Increased funding of through the DIA³⁶⁹ of CSE, CSIS, RCMP, CAF and DND will have a multilateral effect upon NORAD³⁷⁰ and FIORC³⁷¹ – where potentially harmful infrastructure, models and data across the globe are shared as vulnerabilities³⁷² across agencies. We support continuous integration and penetration-testing under Common Criteria³⁷³ specifications and expect all government implementations to hold national deployments to this standard. As part of Robson’s Platform, we use multi-agent intelligence to a high standard of regulation, providing compliance exports for sensitive and regulated defence environments.

³⁶⁰ du, Gouvernement. “Orthus: Achieving High Quality of Attribution in Provenance-Based Intrusion Detection Systems - Archives Des Publications Du CNRC - Canada.ca.” Canada.ca, 8 Sept. 2025, publications-cnrc.canada.ca/fr/voir/objet/?id=f66f1198-54e2-4f5f-ac9b-e84894bc3da4. Accessed 17 Oct. 2025.

³⁶¹ Ghiasvand, Erfan, et al. Resilience against APTs: A Provenance-Based IIoT Dataset for Cybersecurity Research.

³⁶² Government of Canada, Office of the Auditor General of Canada. “Report 7—Combatting Cybercrime.” Www.oag-bvg.gc.ca, 4 June 2024, www.oag-bvg.gc.ca/internet/English/att_e_44499.html.

³⁶³ Canada, Establishment. “The Threat from Large Language Model Text Generators - Canadian Centre for Cyber Security.” Canadian Centre for Cyber Security, 2023, www.cyber.gc.ca/en/guidance/threat-large-language-model-text-generators. Accessed 17 Oct. 2025.

³⁶⁴ Royal Canadian Mounted Police. “National Cybercrime Coordination Centre.” Royal Canadian Mounted Police, 2024, rcmp.ca/en/federal-policing/cybercrime/national-cybercrime-coordination-centre.

³⁶⁵ Government of Canada, Office of the Auditor General of Canada. “Report 7—Combatting Cybercrime.” Www.oag-bvg.gc.ca, 4 June 2024, www.oag-bvg.gc.ca/internet/English/att_e_44499.html.

³⁶⁶ Hints, Matt. “Department of Computer Science, University of Toronto.” Department of Computer Science, University of Toronto, 29 July 2025, web.cs.toronto.edu/news-events/news/u-of-t-researchers-find-gpu-vulnerability-with-catastrophic-effects-on-ai-model-accuracy. Accessed 17 Oct. 2025.

³⁶⁷ “What We Heard Report: Consultations on AI Compute.” Canada.ca, 26 Mar. 2025, ised-isde.canada.ca/site/ised/en/what-we-heard-report-consultations-ai-compute-s6. Accessed 17 Oct. 2025.

³⁶⁸ Brewster, Murray. “Rearming the Military: Should Canada Buy It or Build It?” CBC, 2 Oct. 2025, www.cbc.ca/news/politics/defence-production-politics-military-1.7648184. Accessed 17 Oct. 2025.

³⁶⁹ Public. “Defence Investment Agency - Canada.ca.” Canada.ca, 2025, www.canada.ca/en/defence-investment-agency.html. Accessed 17 Oct. 2025.

³⁷⁰ “North American Aerospace Defense Command (NORAD).” Www.norad.mil, www.norad.mil/.

³⁷¹ The National Counterintelligence and Security Center. “Five Eyes Intelligence Oversight and Review Council (FIORC).” Www.dni.gov, 2024, www.dni.gov/index.php/ncsc-how-we-work/217-about/organization/icig-pages/2660-icig-fiorec.

³⁷² “Open Source Vulnerabilities (OSV) | CISA.” Cybersecurity and Infrastructure Security Agency CISA, 2025, www.cisa.gov/resources-tools/services/open-source-vulnerabilities-osv. Accessed 17 Oct. 2025.

³⁷³ “Publications: CC Portal.” Commoncriteriaportal.org, commoncriteriaportal.org/cc/index.cfm.

Where can AI better position Canada's protection and defence? What will be required to have a strong AI defensive posture?

Canada must secure decision-making advantages through trusted, sovereign AI systems that can withstand threats, cognitive warfare, and AI-enabled disinformation, according to the DND in its Artificial Intelligence Strategy³⁷⁴. Analytics and cybersecurity tools must protect national data sovereignty while ensuring interoperability across allied networks³⁷⁵. Adversaries' expanding computational power outpaces Canada's; requiring resilient, distributed infrastructure and a domestic talent pipeline to maintain operational assurance³⁷⁶.

Positioning Indigenous communities at the core of sovereign AI infrastructure strengthens both security and continental resilience, aligning with Canada's Arctic and Northern Policy Framework, which was co-developed with Indigenous, territorial and provincial partners to advance regional security, infrastructure, and innovation³⁷⁷. First Nations, Inuit, Métis and Cree territories – strategically located along Arctic and Pacific corridors – represent critical frontlines in countering foreign influence, Arctic incursions, and digital espionage. We must look to cross-pollinate between First Nations and remote communities³⁷⁸ as a rising tide to lift all boats. Integrating a mesh of Indigenous-led data centres and AI academies provides edge computing capacity and real-time situational awareness, while embedding traditional ecological knowledge enhances threat pattern recognition and environmental sensing to yield a continental advantage.

To sustain this advantage, Canada must invest in training Indigenous and allied engineers, cybersecurity experts, and AI practitioners within secure innovation corridors that serve as both training hubs and early-warning nodes. Establishing Indigenous-operated facilities hosting elite bilingual AI academies and cybersecurity labs enables Canada and the United States to reinforce shared continental protection and accelerate defence innovation. This approach transforms Indigenous participation from inclusion to strategic co-stewardship, fusing local knowledge with AI-driven defence systems—ensuring that Canada's protection posture remains sovereign, adaptive, and future-ready.

³⁷⁴ National Defence. "The Department of National Defence and Canadian Armed Forces Artificial Intelligence Strategy - Canada.ca." Canada.ca, 2024, www.canada.ca/en/department-national-defence/corporate/reports-publications/dnd-caf-artificial-intelligence-strategy.html.

³⁷⁵ "Emerging Technology and Canadian Defence: From Strong, Secure, Engaged to Present." Canadian Global Affairs Institute, 2025, www.cgai.ca/emerging-technology-and-canadian-defence-from-strong-secure-engaged-to-present. Accessed 27 Oct. 2025.

³⁷⁶ Vincent, Brandi. "Canada Eyes Major Military Investments, More Non-U.S. Defense Partnerships." DefenseScoop, 9 June 2025, defensescoop.com/2025/06/09/canada-new-military-spending-plan-mark-carney/.

³⁷⁷ Government of Canada. "Canada's Arctic and Northern Policy Framework." Www.rcaanc-Cirnac.gc.ca, 14 June 2019, www.rcaanc-cirnac.gc.ca/en/g/1560523306861/1560523330587.

³⁷⁸ Engen, Robert C. "When the Teeth Eat the Tail: Defence AI in Canada." Contributions to Security and Defence Studies, 2024, pp. 63–83, https://doi.org/10.1007/978-3-031-58649-1_3. Accessed 27 Oct. 2025.

Demographic Questions

How do you identify?

Robson Inc. is an organization.

What is your age group?

30-60

Where is your business/organization currently based?

British Columbia, Canada