RE: Bill under consideration: Bill S-206 (45th Parliament, 1st Session)

The Senate Standing Committee on National Finance

# I. Questions Before the Committee

This submission is filed in strong opposition to Bill S-206.

The Committee is asked to consider legislation that does not establish a benefit or a right, but instead authorizes the creation of a national administrative framework to be designed later by the executive. The threshold issue before the Committee is therefore whether Parliament should advance a framework statute that defers the substantive rules governing access, conditions, verification, and safeguards to future administrative action.

In that context, the Committee must confront whether Bill S-206 is confined to the study of a cash income support, or whether it authorizes a broader framework capable of governing access to income, pensions, benefits, and services; whether the bill's use of the term "access," rather than creating a legal entitlement, permits eligibility to be conditional, revocable, and subject to ongoing assessment; and whether assigning responsibility for the framework to the Minister of Finance signals a digitally administered, income-verified system integrated with fiscal and tax mechanisms.

Further questions arise as to whether guaranteed livable basic income frameworks rely on individualized quality-of-life assessment; whether such assessment draws upon integrated data domains including health, employment, education, and financial information; whether "income and benefits," as used in such frameworks, extends beyond cash payments to include essential services such as water and hydro; and whether Bill S-206 contains any statutory limits on data integration, administrative discretion, verification mechanisms, or enforcement tools.

Finally, the Committee must consider whether advancing a substantially similar framework through the Senate, following its decisive rejection by the elected House of Commons, is consistent with democratic accountability.

The sections that follow address these questions directly.

# II. Purpose of Submission

This submission is made in firm opposition to Bill S-206.

The purpose of this submission is to demonstrate that Bill S-206 authorizes the creation of a national administrative framework with sweeping implications for access to income, benefits, and services, while deferring critical decisions on eligibility, conditions, data use, verification, and safeguards to future regulatory and administrative processes.

This submission takes the position that Parliament should not advance enabling framework legislation that establishes authority without defining limits, particularly where substantially similar legislation has already been rejected by the elected House of Commons.

## III. Legislative History and Parliamentary Context

Bill S-206 is not an isolated proposal. It follows multiple prior legislative attempts to establish a national guaranteed livable basic income framework.

Bill C-223 (44th Parliament, 1st Session)

Introduced in the House of Commons

Title: An Act to develop a national framework for a guaranteed livable basic income

Defeated at Second Reading on September 25, 2024

Recorded House vote:

For: 54 Members of Parliament (≈ 16.5%)

Against: 273 Members of Parliament (≈ 83.5%)

This was a decisive rejection by the elected chamber.

Bill S-233 (44th Parliament)

Senate version of the same framework concept

Advanced in the Senate

Died on the Order Paper when Parliament ended

Bill S-206 (45th Parliament)

Reintroduced in the Senate in 2025, following the House defeat

Substantively similar framework proposal

Bill C-253 (45th Parliament)

Companion House private member's bill reintroducing the framework concept

This history demonstrates continued reintroduction of the same framework after rejection by the elected House, now advancing again through the Senate.

## IV. Senate Origin and Reduced Public Exposure

Bill S-206 originates in the Senate, not the elected House of Commons.

By advancing in the Senate first, the bill proceeds through its early stages with significantly less public exposure and media scrutiny than would occur if it were introduced in the House, where debate is more visible and directly accountable to voters.

Senate-origin framework bills are frequently used to establish policy direction and administrative architecture before broad public awareness or fiscal debate occurs, with detailed scrutiny often delayed until much later in the legislative process.

## V. Nature of Bill S-206 as a Framework Statute

Bill S-206 is a framework statute. It does not:

Create a guaranteed income program

Set benefit levels

Appropriate funds

Create enforceable legal rights

Instead, it requires the Minister of Finance to develop a national framework governing access to a guaranteed livable basic income for persons over the age of 17, with reporting obligations to Parliament.

Framework legislation establishes authority and architecture, not outcomes. Substantive decisions are deferred to future regulations, intergovernmental agreements, and administrative systems, often without renewed parliamentary debate on first principles.

## VI. Assignment to the Minister of Finance

Responsibility for the framework is assigned to the Minister of Finance, signaling a future system that would be:

Digitally administered

Income-verified

Integrated with tax and fiscal systems

Subject to ongoing reporting and reconciliation

This places the proposed system within financial governance, not discretionary social assistance, while allowing its foundational architecture to advance through the Senate before widespread public examination.

## VII. “Access” Versus “Entitlement”

Bill S-206 speaks of “access” to a guaranteed livable basic income, not a legal entitlement.

In Canadian administrative and constitutional law:

“Access” implies eligibility criteria, verification mechanisms, and conditions

Access may be granted, limited, suspended, or withdrawn

Access is administered through regulation and discretion

By contrast, an entitlement:

Is enforceable in court

Limits administrative discretion

Requires due process before denial

Bill S-206 creates no entitlement. It creates only the possibility of access, the terms of which are deferred to a future framework designed by the Minister of Finance.

This distinction shapes how individuals are treated: not as rights-holders, but as participants subject to ongoing assessment.

## VIII. Quality-of-Life Assessment and Data Domains

Although the text of Bill S-206 does not enumerate data sources, background materials and policy frameworks supporting guaranteed income proposals consistently reference quality-of-life assessment at both the individual and community level.

These materials specify integrated data domains, including:

Health

Employment

Education

Finances

Once quality-of-life assessment is individualized, these domains become person-linked, rather than purely statistical or aggregate.

## IX. “Income and Benefits,” Including Essential Services

In guaranteed income and quality-of-life frameworks, “income and benefits” is defined broadly and is not limited to cash payments.

It commonly includes:

Cash transfers

Tax credits and rebates

Subsidies

In-kind supports

Essential service supports

Within this policy context, water and hydro are treated as benefits, because:

They are essential to habitability

Utility insecurity is a standard deprivation indicator

Access and affordability directly affect quality of life

## X. Digital Delivery and Banking-Process Verification

Any modern guaranteed income system is digitally delivered.

In a digital system:

Payments may fail, be delayed, reversed, or clawed back

Overpayments and eligibility disputes occur

Funds may appear to “disappear” due to administrative or technical errors

Resolving these issues necessarily requires transactional verification through banking systems. This does not imply constant surveillance, but it does require access to banking processes when disputes arise.

Without such verification, a digital income system cannot function.

## XI. Data Linkage Pressure and Absence of Statutory Limits

Bill S-206 is silent on:

Limits to data domains

Restrictions on cross-system data linkage

Prohibitions on banking or utility verification

Boundaries on individualized assessment

Privacy safeguards specific to the framework

Silence at the framework stage is not neutral. It delegates these decisions forward to regulators and administrators.

# XII. Conclusion

Bill S-206 follows a framework proposal that was decisively rejected by the elected House of Commons in 2024. Reintroduced through the Senate, it authorizes the design of a national system whose supporting materials already specify integrated personal data domains — health, employment, education, and finances — and rely on individualized quality-of-life assessment.

In a digital system where income and benefits include essential services and access is conditional, banking-system verification and cross-domain data linkage become operational necessities unless Parliament draws clear legal boundaries.

The Committee is therefore urged to scrutinize not only the stated objectives of Bill S-206, but the architecture it authorizes and the safeguards it omits.

XIII. Permission for Public Disclosure

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Entered into the official record of the Committee; and

Published in full on the Committee’s public website, including any online archives or publicly accessible parliamentary materials.

This permission is granted in the interest of transparency, public accountability, and informed democratic debate.

# Appendix – List of people who submitted this brief

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