

24, rue Clarence Street
Ottawa, Ontario
CANADA K1N 5P3

Tel./Tél. : 613-241-5221
Fax/Télé. : 613-241-7440
www.fcm.ca

July 8, 2010

The Honourable Tony Clement, P.C., M.P.
Minister of Industry Canada
300 Slater Street, 16th Floor
Ottawa, Ontario K1A 0C8

Dear Minister:

As you know, on June 26, 2011 Statistics Canada announced that it has discontinued the mandatory long-form questionnaire in favour of a voluntary National Household Survey (NHS). As the minister responsible for Statistics Canada, we are writing to urge you to consider the consequences of this decision.

Federal, provincial, territorial and municipal governments all use the data that is gathered on the long-form to target and evaluate the effectiveness of public services and investments. In fact, over 25 pieces of federal legislation alone require Census data in order to allocate funds and target and evaluate services, with many more examples at the provincial, territorial and municipal levels. Municipalities use Census data, particularly long-form data, to target which resident groups and neighbourhoods require public services like immigrant settlement support, low-income housing, child care and transit.

Making the replacement for the long form voluntary will likely reduce the quality of the census data for two reasons:

- **Sample size:** The NHS will likely generate fewer responses than the long-form Census questionnaire. Although the NHS sample size is more than twice as large as the long-form Census (4.5 million households versus 2 million), the response rate for a voluntary survey is much lower for a mandatory survey like the Census. Even at a 30 per cent response rate, which is higher than Statistics Canada expects from most voluntary surveys, the NHS will only generate 1.35 million responses. The long-form questionnaire enjoys a response rate of over 97 per cent which translates to 1.94 million responses – over 40 per cent more than the NHS. This difference in sample size is significant when using data at a municipal and neighborhood level: a smaller national sample size means fewer samples within local areas, which reduces the quality and availability of data from these smaller areas. FCM has been engaged with Statistics Canada and various federal government departments in an effort to make local area data more accessible and affordable to municipal governments – a welcome effort that recognizes how important federally collected data is to good municipal government. The change to the Census will reduce the quality and availability of local area data that municipalities rely on to improve service and performance.

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- **Respondent profile:** The people who tend to rely most on many municipal programs, such as recent immigrants, aboriginal Canadians and those in lower socio-economic groups, are the very ones who would be least likely to fill out a voluntary survey. This will result in undercounting these population segments and reduce the quality of available information on these groups who are often hard to serve.

The value of this data needs to be weighed against what is asked of citizens to complete the long-form:

- For most households, the long-form questionnaire requires on average less than 20 to 30 minutes to complete, much less than completing an income tax return.
- Statistically, the average household will receive the long-form once every 25 years (once every five Censuses).
- Statistics Canada is highly rigorous in protecting the anonymity and confidentiality of individual long-form responses.

To keep Canada strong, we need to know how the country is changing, where people live, work and raise their families. The census helps us do that. With good quality data, we can do a better job serving taxpayers: we can see where we need to run new bus routes, build affordable housing, or set up support programs for new Canadians. These changes in the census will likely hurt the quality of Census data available to municipalities. That will make it harder for us to serve our citizens. The federal government needs to explain how it will make sure that doesn't happen.

Sincerely,

A handwritten signature in black ink, appearing to read "Hans Cunningham". The signature is fluid and cursive, with a long, sweeping underline.

Hans Cunningham
President

HC/at:sd