Submission to the People's Consultation on AI
Women's Legal Education and Action Fund (LEAF)

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1. Introduction

Technology is neither neutral nor unbiased. Because most of it is developed and controlled by the privileged few–often, white men–it often replicates the oppressive forces of the world we live in. At its worst, it accelerates and amplifies the exclusionary and oppressive norms of our society while also making its discriminatory impacts more difficult to uncover.

As a signatory to the open letter to the Minister of AI and Digital Innovation, and to Industry, Science, and Economic Development Canada, the Women's Legal Education and Action Fund (LEAF) endorses all the calls to action outlined in the letter. In this submission, we focus on the impact of the technology commonly referred to as artificial intelligence (AI) on women, girls, trans, and non-binary people, through a substantive equality lens.

We urgently need:

i. legal and policy responses that will curb excessive corporate control over AI and regulate state involvement in AI, by enabling meaningful participation and decision-making from people and communities who will be most directly impacted by the technology; and
ii. a range of legal and non-legal survivor-centred tools to intervene and remedy harms of AI when they occur to individuals and communities.

2. About LEAF

LEAF is a national, charitable, non-profit organization that works towards ensuring the law guarantees substantive equality for all women, girls, trans, and non-binary people. LEAF has developed expertise in the gendered and intersectional impact of technology-facilitated violence through intervening in landmark cases before the Supreme Court of Canada[2] and making submissions to Parliament to highlight gender equity implications of online hate.[3] Representatives of LEAF are frequently invited to speak about technology and substantive gender equality, including consultations with representatives of Parliament.

[2] LEAF was an intervener in *R v Jarvis*, 2019 SCC 10, where it urged the Supreme Court of Canada to apply an equality lens when interpreting the *Criminal Code* provision on voyeurism.
[3] See e.g. Moira Aikenhead, Suzie Dunn, & Rosel Kim, "Submission to Canadian Heritage on the Federal Government's Proposed Approaches to Address Harmful Content Online" (25 September 2021) online: *Women's Legal Education and Action Fund (LEAF)* <https://www.leaf.ca/wp-content/uploads/2021/09/2021-09-25-LEAF-Submission-re-Harmful-Online-Content.pdf>.

3. What We Mean When We Say AI

As the People's Consultation on AI's resources and materials point out, the term "AI" has become so overbroad and all-encompassing that it has become a mystified term that requires unpacking.[4] We echo the calls of many experts concerned with AI, human rights, and the unequal distribution of power to be specific about the technology we discuss in order to make meaningful and targeted policy recommendations.[5] We anchor our submission based on this understanding of the term in order to debunk the notion that the technology has super-human or godlike qualities; instead, the technology is very much a reflection of our existing systems and inequalities.

In this submission, we use the term AI to discuss generative AI (algorithms that can generate information and content), automated decision-making, and biometric identification systems, though our comments and recommendations also apply to other forms of AI.

4. Impacts of AI Technologies

As we have witnessed with social media before, leaving self-interested technology companies and other AI developers in an increasingly oligopolistic marketplace to control the development, release and use of AI is proving to be both harmful and dangerous. Decisions by these private actors have marked and in some cases irreversible individual and collective human rights and environmental consequences. Often, these consequences reflect and are enabled by prior failures to dismantle underlying structural violence grounded in misogyny, racism, colonialism, and other intersecting forms of oppression. They are also amplified by the state's use of these technologies and by the state's refusal to enforce and/or close gaps in existing laws to address human rights violations and other forms of violence that expose marginalized community members to harm in the first place.

The technology we call AI does not exist in a vacuum, nor does it generate content that is "free". It comes at enormous human and environmental cost.

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[4] Emily Tucker, "Artifice and Intelligence" (16 March 2022) online: *Tech Policy Press* <https://www.techpolicy.press/artifice-and-intelligence/>

[5] Kara Williams & Ben Winters, "Specific Terms for Specific Risks: The Need for Accurate Definitions of AI Systems in Policymaking" (1 October 2025) online: *Electronic Privacy Information Center* <https://epic.org/specific-terms-for-specific-risks-the-need-for-accurate-definitions-of-ai-systems-in-policymaking/>

a) Human costs

The human costs of AI based on the large language model approach favoured by dominant players in the industry[6] are many. Here we focus on some of AI's negative impacts on human rights to privacy and substantive equality, and on workers.

i. *Privacy impacts*: AI technology requires a significant amount of data, much of which is "scraped"[7]–taken without the consent of the people it pertains to and later exploited for purposes such as corporate and state surveillance and profiling.[8] Even if individuals' tacit consent were obtained, they would have little chance of understanding the consequences of the taking and use of their data either for themselves or for others given the "black box"[9] nature and complexity of data analysis and assemblage.[10]

ii. *Substantive equality impacts*: Predictive technologies and large language models embed and perpetuate racist and sexist biases. As a result, their unfettered use has unleashed and amplified discrimination, abuse, and violence against women, girls, trans, and non-binary people, as illustrated in the following examples:

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[6] Alternatives to LLMs that pose less risk of environmental and human harm exist, but are not favoured by the small handful of large technology companies that exert significant control over the market: Issie Lapowsky, "Why Timnit Gebru wants AI giants to think small" (Fast Company, 19 Sep 2023), *online*: https://www.fastcompany.com/90952740/why-timnit-gebru-wants-ai-giants-to-think-small.

[7] See for example Mike Isaac, "Reddit Accuses 'Data Scraper' Companies of Stealing Its Information" *New York Times* (22 October 2025) online: <https://www.nytimes.com/2025/10/22/technology/reddit-data-scrapers-perplexity-theft.html>

[8] See, for example: Office of the Privacy Commissioner of Canada, "Website that generates revenue by republishing Canadian court decisions and allowing them to be indexed by search engines contravened PIPEDA", PIPEDA Report of Findings #2015-002 (5 June 2015), online: https://www.priv.gc.ca/en/opc-actions-and-decisions/investigations/investigations-into-businesses/2015/pipeda-2015-002/; and Office of the Privacy Commissioner of Canada, "Joint investigation of Clearview AI, Inc by the Office of the Privacy Commissioner of Canada, the Commission d'accès à l'information du Québec, the Information and Privacy Commissioner for British Columbia, and the Information Privacy Commissioner of Alberta, PIPEDA Findings #2021-001 (2 February 2021), online: https://www.priv.gc.ca/en/opc-actions-and-decisions/investigations/investigations-into-businesses/2021/pipeda-2021-001/.

[9] For further discussion, see ProPublica's *Breaking the Black Box* series (2016), available here: https://www.propublica.org/series/machine-bias.

[10] Jane Bailey, Jacquelyn Burkell and Brenda McPhail, *Submissions on Bill C-27: The Digital Charter Implementation Act* (2023), online: https://www.ourcommons.ca/Content/Committee/441/INDU/Brief/BR12605252/br-external/Jointly3-e.pdf at pp 4-5.

- Researchers have warned against the racist and sexist outputs by facial recognition technology, particularly against dark-skinned Black women, which have been used by law enforcement and border agencies.[11]
- Chatbots are reinforcing and perpetuating sexism, racism, homophobia, and transphobia in dangerous, discriminatory, and sometimes life-threatening ways, as algorithmic decision-making becomes more embedded into everyday life such as hiring decisions and healthcare.[12]
- Recently, deepfakes and synthetic intimate images became a subject of media scrutiny, due to X/Twitter users weaponizing the app's AI chatbot Grok to create non-consensual deepfakes of women and children.[13] Women who spoke out against this behaviour were subject to more deepfakes and harassment on the platform.[14]
- Large Language Models (LLM) like ChatGPT replicate and reinforce misogynistic, sexist, and violent tendencies of our society, often to people who are vulnerable and isolated, contributing to outcomes like suicide,[15] stalking and harassing women,[16] and mass casualty events.[17]

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[11] In *Barre v. Canada (Citizenship and Immigration)*, 2022 FC 1078, the Federal Court of Canada recognized the equality implications of border services' potential use of facial recognition to verify identities of Black refugee claimants: "two women of colour who are more likely to be misidentified by facial recognition software than their white cohorts as noted by the studies submitted by the applicants." (para 56). See also Gideon Christian, "AI Facial Recognition Technology in the Canadian Immigration System" *Canadian Immigration Lawyers Association* (29 August 2023), online: <https://cila.co/ai-facial-recognition-technology-in-the-canadian-immigration-system/>.

[12] Jeffrey Dastin, "Insight-Amazon scraps secret AI recruiting tool that showed bias against women", *Reuters* (10 October 2018), online:<https://www.reuters.com/article/us-amazon-com-jobs-automation-insight/amazon-scraps-secret-ai-recruiting-tool-that-showed-bias-against-women-idUSKCN1MK08G/>; Ziad Obermeyer, et al, "Dissecting racial bias in an algorithm used to manage the health of populations" (2019) 366:6464 Science 447, online: <https://www.science.org/doi/10.1126/science.aax2342>.

[13]Anja Karadeglija, "Sexual deepfakes on X show need for online regulator, advocates say", *Canadian Press* (12 January 2026), online: <https://www.cbc.ca/news/politics/x-deepfakes-canada-9.7043522>.

[14] Amelia Gentleman & Helena Horton, "'Add blood, forced smile': how Grok's nudification tool went viral", *The Guardian* (11 January 2026), online: <https://www.theguardian.com/news/ng-interactive/2026/jan/11/how-grok-nudification-tool-went-viral-x-elon-musk>.

[15] Rob Kuznia, Allison Gordon, and Ed Lavandera, "'You're not rushing. You're just ready:' Parents say ChatGPT encouraged son to kill himself" *CNN* (20 November 2025) online: <https://www.cnn.com/2025/11/06/us/openai-chatgpt-suicide-lawsuit-invs-vis>

[16] Miles Klee, "He Was Indicted for Cyberstalking. His Former Friends Tracked His ChatGPT Meltdown." *Rolling Stone* (14 January 2016), online: <https://www.rollingstone.com/culture/culture-features/chatgpt-ai-cyberstalking-social-media-1235496884/>

[17] Centre for Countering Digital Hate, "Killer Apps: How Mainstream Chatbots Assist Users Planning Violent Attacks" (March 2026) at p 4, online: https://counterhate.com/wp-content/uploads/2026/03/Killer-

iii. *Worker impacts*: In addition to having significant impacts on jobs in Canada and elsewhere in North America,[18] AI based on LLMs also requires hours of human "training" and moderation–where often-underpaid and exploited workers from the Global South must watch, read, and otherwise engage with the data, often in large volume for low pay–including violent content.[19]

As the above examples illustrate, these consequences are disproportionately borne by marginalized community members facing intersecting forms of oppression who are currently responsibilized[20] to protect themselves from harm. Without meaningful recourse for harms or requirements for companies to design products that centre human rights and substantive equality, these communities are left without solutions or supports and exposed to the risk of continued harms.

b) Environmental costs

AI based on LLMs requires a tremendous amount of natural resources. On average, the electricity required for a typical AI data centre is the same amount needed for about 100,000 households, and larger centres are expected to use about 20 times more.[21] As Canada contemplates building "sovereign" data centres[22] as an opportunity for economic growth,[23] it remains to be seen how the government would meaningfully

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Apps_FINAL_CCDH.pdf. See also: Jesse Winter, "Tumbler Ridge shooter's ChatGPT messages were flagged months before attack" *Globe and Mail* (20 February 2026) online: <https://www.theglobeandmail.com/canada/article-tumbler-ridge-shooters-chatgpt-messages-were-flagged-months-before/>

[18] Canadian Union of Public Employees, "Budget 2025: Federal government fails workers on AI" (13 Nov 2025), online: https://cupe.ca/budget-2025-federal-government-fails-workers-ai.

[19] Anuj Behal, "'In the end, you feel blank': India's female workers watching hours of abusive content to train AI" *The Guardian* (5 February 2026) online: <https://www.theguardian.com/global-development/2026/feb/05/in-the-end-you-feel-blank-indias-female-workers-watching-hours-of-abusive-content-to-train-ai>; Victor Tangerman, "Meta Workers Say They're Seeing Disturbing Things Through Users' Smart Glasses" *Futurism* (2 March 2026) online: https://futurism.com/artificial-intelligence/meta-disturbing-smart-glasses

[20] By "responsibilized", we want to highlight how survivors are *forced* to be responsible for remedying the harm they experienced, as opposed to the person who harmed them and/or the state.

[21] International Energy Agency, *Energy and AI: World Energy Agency Special Report* (10 April 2025) *online:* International Energy Agency <https://www.iea.org/reports/energy-and-ai>

[22] Innovation, Science and Economic Development Canada, "Enabling large-scale sovereign AI data centres" (last modified 16 February 2026) online: Government of Canada <https://ised-isde.canada.ca/site/ised/en/enabling-large-scale-sovereign-ai-data-centres>

[23] Drew Anderson, "A $10-billion AI data centre races ahead in a rural Alberta town, population 9,679" *The Narwhal* (23 February 2026) online: <https://thenarwhal.ca/olds-alberta-ai-data-centre/>

consult with Indigenous peoples to ensure Indigenous sovereignty and control over land and data.[24]

5. Problems & Concerns with AI

Given the extensive harms enumerated above, it is telling that women are reportedly less likely to take up AI use,[25] and that the adoption of AI-enabled technologies is viewed more negatively by trans, non-binary, and disabled people.[26] It is past time for governments and decision-makers to take these hesitations and concerns seriously and ask what we lose when we prioritize technology development above all else. Here we focus on four concerns.

a) Myopic focus on growth: Our key concern with AI technologies, in general, is the overwhelming focus on the development and growth of the technology at all costs, and very little on those who are more likely to be harmfully impacted by the technologies. Despite the known and reported harms of AI-based technology, we have yet to see any meaningful policy responses from governments in Canada or attempts to curb corporate control over the unrestricted deployment of the technology. Instead, we have seen the push for investments for AI-enabled technologies framed as a great economic opportunity and innovation for people in Canada coming at the expense of its known impacts on marginalized people, communities, and the environment.[27]

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[24]See for example John Ahni Schertow, "Indigenous Peoples Push Back as Data Centres Expand Across North America" *IC Magazine* (25 February 2026) online: <https://icmagazine.org/indigenous-peoples-push-back-as-data-centers-expand-across-north-america/>;
John Borrows & Lisa Austin, "The Digital Charter Implementation Act ignores Indigenous Data Sovereignty" (6 December 2022) online: Schwartz Reisman Institute for Technology and Society <https://srinstitute.utoronto.ca/news/digital-charter-implementation-act-ignores-indigenous-data-sovereignty>

[25] Maria Bolis, "The AI Gender Gap Paradox" (27 October 2025), online: The Standford Social Innovation Review <https://ssir.org/articles/entry/ai-gender-gap-paradox>.

[26] Oliver L. Haimson et al, "AI Attitudes Among Marginalized Populations in the U.S.: Nonbinary, Transgender, and Disabled Individuals Report More Negative AI Attitudes" (2025), FAccT '25: Proceedings of the 2025 ACM Conference on Fairness, Accountability, and Transparency 1124, online: <https://dl.acm.org/doi/10.1145/3715275.3732081>.

[27] Atlantic Canada Opportunity Agency, News Release, "Minister Solomon announces $ 8.5M for 40 AI projects to help Atlantic Canadian Businesses grow" (3 March, 2026), online:<https://www.canada.ca/en/atlantic-canada-opportunities/news/2026/03/minister-solomon-announces-85m-for-40-ai-projects-to-help-atlantic-canadian-businesses-grow.html)>.

b) Lack of sociotechnical expertise and diversity in the tech sector: Decision-making and oversight in the AI sector is focused on technical issues with technical experts,[28] predominantly white men from the Global North.[29] The lack of representation of those from interdisciplinary fields of social science, ethics, and community advocacy inhibits reflection, debate and deep consideration of the social, cultural, and ethical effects of technologies. Compounding this problem is a failure to centre the experiences and expertise of marginalized communities in technology decision-making processes in other ways. Including marginalized perspectives is essential for identifying risks, preventing harm, and determining whether AI is a net benefit, including clearly asking and assessing who stands to benefit and who stands to lose.[30] Without this, benefits to some will accrue at the expense of further marginalization of already-marginalized communities.

c) Hazardous "move fast and break things" ethic: Technology companies often move quickly to develop and make technology available, and there is a lack of incentives in place for them to consider such impacts. The recent tragedy of the Tumbler Ridge mass shooting in BC is just one example of the complexity of the role of AI, in this case, OpenAI's ChatGPT, in contributing to harms in the community. These events have brought long-standing questions about corporate accountability to the fore.[31] That said, before moving immediately to deputize private actors like OpenAI as "a private surveillance wing of law enforcement", which would disproportionately harm already-marginalized communities,[32] we should question the absence of public deliberation, review or oversight prior to profit-motivated corporations' unleashing of generative AI technologies on the public in the first place. Rather than permitting or encouraging data-hungry, profit-focused and self-interested AI companies to engage in further

[28] Serena Oduro & Tamara Kneese, "AI Governance Needs Sociotechnical Expertise: Why the Humanities and Social Sciences Are Critical to Government Efforts" (2024), online: Data & Society <https://datasociety.net/library/ai-governance-needs-sociotechnical-expertise/>.
[29] Dylan Walsh, "Timnit Gebru: Ethical AI Requires Institutional and Structural Change", Standford University Human-Centred Artificial Intelligence (26 May 2022), online: https://hai.stanford.edu/news/timnit-gebru-ethical-ai-requires-institutional-and-structural-change.
[30] Joy Buolamwini, *Unmasking AI: My Mission to Protect What is Human in a World of Machines*. (New York: Penguin, 2023).
[31] Marina von Stackelberg, "OpenAI CEO expressed 'horror and responsibility' over ChatGPT's ties to Tumbler Ridge, AI minister says" (CBC News, 4 March 2026), online: https://www.cbc.ca/news/politics/evan-solomon-open-ai-meeting-ceo-sam-altman-9.7114767.
[32] Cynthia Khoo, quoted in Maria Cheng and Ryan Patrick Jones, "OpenAI's ban of Canada school shooting suspect's account raises scrutiny of other online activity" Reuters (25 February 2025), online: https://www.reuters.com/world/openais-ban-canada-school-shooters-account-raises-scrutiny-other-online-activity-2026-02-25/.

surveillance, we ought to be focused on the development, deployment and use of AI regulations in Canada that centre and prioritize public deliberation, and human rights such as substantive equality, privacy, and safety.

d) State complicity: The Canadian government and government agencies, such as law enforcement, contribute to AI's harms, not only through unreflective adoption of privately developed technologies,[33] but also in policymaking that has resulted in the regulatory lacuna mentioned above. Government policy and policy processes that defer to industry's regulatory preferences, centre industry's interests in profit and growth, and prioritize technological and economic growth over social well-being and equality will accelerate already-documented and known harms, implicating the state in technology-facilitated violence. Further, this over-alignment of government policy with corporate interests flies in the face of Canada's existing human rights and equality laws, international human rights obligations to protect against violations of human rights perpetrated by private actors, including businesses,[34] and stated commitments in Canada's Digital Charter to safety and security, control and consent, data and digital for good, freedom from hate and violent extremism, and strong enforcement and real accountability.[35]

6. Recommendations

We urgently need legal and policy responses that curb the excesses of corporate control,[36] end state complicity and abuse, and commit to upholding and protecting the equality and human rights of people. We outline our recommendations with respect to those responses below.

1) **Fund and engage in ongoing, meaningful, inclusive, and community-based processes that centre the lived experiences and knowledge of marginalized**

[33] Office of the Privacy Commissioner of Canada, "RCMP's use of Clearview AI's facial recognition technology violated *Privacy Act*, investigation concludes" (OPC, 10 June 2021), online: https://www.priv.gc.ca/en/opc-news/news-and-announcements/2021/nr-c_210610/.
[34] John Ruggie, Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework, UNHRCOR, 2011, UN Doc HR/PUB/11/04
[35] Innovation, Science and Economic Development Canada, Canada's Digital Charter in Action: A Plan by Canadians for Canadians (ISED Canada, 2019) p 15, online: https://ised-isde.canada.ca/site/innovation-better-canada/sites/default/files/attachments/Digitalcharter_Report_EN.pdf.
[36] For further discussion see, for example: Karen Hao, Empire of AI: Dreams and Nightmares in Sam Altman's Open AI. (New York: Penguin Press, 2025).

communities facing multiple intersecting barriers and engage interdisciplinary socio-technical experts throughout the policy cycle by:

a) prioritizing their participation in law and policy making processes (e.g. government-appointed task forces, government consultations and inquiries, and committee hearings);
b) providing financial, informational and other resources they need to participate in those processes effectively in order to begin to level the playing field between marginalized communities and the remarkably well-resourced tech industry that uses its prioritized position in these processes to maximize its own self interest;
c) respecting Indigenous sovereignty over land and data;[37]
d) ensuring these processes allow appropriate time for deliberation across a range of issues, including consideration not only of how AI technology should be regulated, but also the prior question of whether, and if so, in what sorts of situations, creation, use and deployment of AI technology should be permitted in the first place;
e) ensuring these processes focus on social, cultural and ethical implications of technology, not just technical aspects;[38] and
f) putting them in decision-making positions with binding legal authority in statutorily created and protected and independently funded regulatory bodies such as the designated agency described in 2(e) below.

2) **Enact legislative initiatives that are sufficiently broad and principled by:**

(a) making them applicable to both private parties and the state, including government agencies and law enforcement authorities;
(b) prioritizing precaution, substantive equality, human rights, privacy protections, transparency, and accountability, as detailed in LEAF and Citizen Lab's Joint Submission to the Toronto Police Services Board's Use of New Artificial Intelligence Technologies Policy in 2021.[39]

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[37] See for example The First Nations Information Governance Centre, *Ownership, Control, Access and Possession (OCAP™): The Path to First Nations Information Governance* (May 2014) online: The First Nations Information Governance Centre <https://achh.ca/wp-content/uploads/2018/07/OCAP_FNIGC.pdf>; Stephanie Russo Carroll, Desi Rodriguez-Lonebear & Andrew Martinez, "Indigenous Data Governance: Strategies from United States Native Nations" (2019) 18 Data Science Journal 31. <DOI: 10.5334/dsj-2019-031>.

[38] Serena Oduro & Tamara Kneese, "AI Governance Needs Sociotechnical Expertise: Why the Humanities and Social Sciences Are Critical to Government Efforts" (2024), online: Data & Society <https://datasociety.net/library/ai-governance-needs-sociotechnical-expertise/>.

[39] Kristen Thomasen, Suzie Dunn, and Kate Robertson, *LEAF and Citizen Lab Submission to the Toronto Police Services Board's Use of New Artificial Intelligence Technologies Policy* (15 Dec 2021), online:

3) **Enact legislative initiatives designed to prevent harms arising from AI by:**

(a) articulating clear no-go zones prohibiting development, use and/or deployment of AI systems in specific situations[40] to be identified through deliberative processes described in (1) above, including mass surveillance uses of facial recognition technology, and AI systems that create non-consensual deep nudes;

(b) imposing regulatory evaluation and approval processes based on publicly defined safety and human rights standards that non-prohibited AI systems must satisfy prior to entering into the market or being used by the state;

(c) imposing legal duties relating to non-prohibited AI systems that are approved for market entry or use by the state to:

i. be transparent;

ii. be publicly accountable;

iii. respect publicly defined standards for safety, and human rights, including substantive equality and privacy;

iv. develop, implement and continuously review plans for mitigating against the risk of human rights and safety violations (including technology-facilitated gender based violence) both in relation to how systems are used by others and to how those systems are designed and function;

v. report annually to the designated agency described in (d) below and to make that report publicly available;

(d) creating a designated agency whose decision-making structure is modelled on the principles articulated in (1) above that is:

(i) staffed and overseen by people with specialized knowledge (including with respect to equality, privacy and other human rights), and headed by marginalized communities who are; and

(ii) empowered with legally enforceable investigatory and decision making authority to externally review and monitor and independently investigate state and private regulated entities and to impose substantial penalties for failure to comply with (a) to (d).

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https://www.leaf.ca/wp-content/uploads/2021/12/TPSB_Public_Consultation_-_AI_Technologies_Policy_-_Dec_15_2021_Submission.pdf.

[40]Examples of these kinds of approaches can be found in processes and requirements set out in industries such as medical devices and drugs, as well as in the *EU AI Act* and should be identified based on the inclusive decision-making processes identified in (1).

4) **Incentivize technology companies to improve representation of members of marginalized communities in positions of power and authority in their organizations, and in system creation, design and deployment** by, for example, making that a criterion for participation in bids for government contracts.

5) **Adopt a multi-pronged, coordinated approach among different government departments.** Since, for many survivors, data privacy, AI-facilitated harms, and online harms do not exist in silos, legal and policy responses must reflect the interconnected nature of these issues.

6) **Adopt a range of survivor-centred legal and non-legal tools to intervene, with urgency, when harms to individuals, society, and environment from AI do occur.** Such tools must be designed in consultation with and address the varying needs and desires of individual and community survivors of AI harms, including:
    a) creation and funding of a designated agency to support survivors;
    b) take-down remedies;
    c) enforcement and improvement of existing civil, criminal and human rights remedies, including by making them faster and more effective and closing legislative gaps (e.g. expanding section 162.1 of the *Criminal Code* to address non-consensual deepfakes);[41] restorative justice approaches; and
    d) improved funding for trusted community organizations to whom survivors of AI- and other technology-facilitated violence often turn for support and guidance.

[41] We note that Bill C-16 (*Protecting Victims Act*), which is currently at consideration in committee at the House of Commons, would criminalize the non-consensual distribution of certain deepfakes if passed.