The Institute of Internal Auditors
Elevating Impact

October 23, 2025

The Honourable Jean-Yves Duclos, M.P.
Standing Committee on Public Safety and National Security
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6

RE: IIA Comments on the Critical Cyber Systems Protection Act (Bill C-8, Part II)

Dear Mr. Duclos:

On behalf of The Institute of Internal Auditors (The IIA), the international professional association representing over 265,000 internal auditors – including more than 8,000 members in Canada – we appreciate the opportunity to comment on the House of Commons' proposed legislation entitled: *Critical Cyber Systems Protection Act* (Bill C-8, Part II).[1]

As organizations across all industries continue to confront an evolving cybersecurity risk environment, it is evident that a robust legislative and regulatory framework is essential to achieving two primary objectives:

- Establish processes for effectively identifying and mitigating potential organizational cybersecurity risks.

- Ensure appropriate internal controls and independent assurance procedures are in place.

Given the internal audit profession's central role in evaluating cybersecurity risk, The IIA believes that the consistent application of cybersecurity regulations is necessary to strengthen organizational defenses. The proposed *Critical Cyber Systems Protection Act* advances this objective by empowering designated government officials to order internal audits at regulated operators. Each reference to a government-directed internal audit states the following:

> *…order a designated operator to, within a specified period and in accordance with the order, conduct an internal audit of its practices, books and other records to determine whether the designated operator is in compliance with any provision of this Act or the regulations.*[2]

Recognizing the complexity of evaluating cybersecurity risk and compliance – coupled with the need for a consistent application of such assessments – The IIA believes it would add valuable clarity that the Standing Committee on Public Safety and National Security explicitly define the term "internal audit" as follows:

> ***Internal Audit*** *means an independent, objective assurance and advisory service, conducted in accordance with the International Professional Practices Framework® of the Institute of Internal Auditors.*

[1] "Bill C-8, *An Act respecting cyber security, amending the Telecommunications Act and making consequential amendments to other Acts*," 2025, House of Commons, Parliament of Canada, First Reading: June 18, 2025

[2] "*Critical Cyber Systems Protection Act* (Bill C-8, Part II)," House of Commons, Parliament of Canada, First Reading: June 18, 2025

Incorporating this definition of internal audit – which specifically references the International Professional Practices Framework® (IPPF®) – will further strengthen the proposed legislation in three key respects:

- The IPPF® establishes the professional standards, independent reporting relationships, and credentials that govern the conduct of internal audits
- The framework includes a mandatory *Cybersecurity Topical Requirement*, which "represents a minimum baseline for assessing cybersecurity in an organization"[3]
- It ensures alignment with Section 4.1.2 of the Treasury Board of Canada Secretariat's *Policy on Internal Audit*, which requires governmental internal audits to comply with the IPPF®[4]

The IIA believes that the addition of a formal definition of internal audit is fundamental to eliminating ambiguity, promoting consistency, and enhancing organizational confidence in the legislation's implementation and strongly recommends its incorporation.

Should you or your staff have any questions regarding this matter or wish to discuss ways in which the internal audit profession can support your work, please contact Ryan Singh, IIA Director of Advocacy (Canada), at Ryan.Singh@TheIIA.org.

Thank you for your consideration of our comments.

Sincerely,

Anthony J. Pugliese, CIA, CPA, CGMA, CITP
President and Chief Executive Officer
The Institute of Internal Auditors

Jeff McIlravey, CRMA, CFSA
Director, Canada
The Institute of Internal Auditors

cc: Members of the Standing Committee on Public Safety and National Security

[3] "*Cybersecurity Topical Requirement*," 2025, The Institute of Internal Auditors, Issued: February 5, 2025

[4] "*Policy on Internal Audit*," 2023, Treasury Board of Canada Secretariat, Effective: June 15, 2023