



Canadian Association of Chiefs of Police
Association canadienne des chefs de police

Submission to the
House of Commons Standing Committee on Justice and Human Rights

Bill C-29 – Financial Crimes Agency Act

Submitted by:

Canadian Association of Chiefs of Police

(Law Amendments Committee and Electronic Crime Committee)

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The Canadian Association of Chiefs of Police (CACP) welcomes the opportunity to provide the House of Commons Standing Committee on Justice and Human Rights with the Canadian police leadership perspective on Bill C-29, the *Financial Crimes Agency Act*.

The CACP supports the objective of strengthening Canada's capacity to prevent, investigate and disrupt serious and complex financial crime. Financial crime increasingly transcends traditional geographic and institutional boundaries, and Canada requires stronger national coordination, investigative capacity, intelligence sharing and asset recovery capabilities.

The CACP has previously called for enhanced national capacity to combat fraud. In its April 2026 submission as part of the Government of Canada's consultation on a National Anti-Fraud Strategy, the Association identified limited investigative capacity for large-scale, multi-jurisdictional fraud and fragmented information-sharing authorities as significant barriers to an effective national response.

Against that backdrop, the CACP views the creation of a specialized federal Financial Crimes Agency (FCA) as an important opportunity. However, the value of the new Agency will depend not simply on the powers it possesses, but on how those powers interact with the authorities, expertise, investigations and responsibilities of existing police services and provincial partners.

Bill C-29 establishes the FCA as a specialized federal law enforcement agency mandated to investigate financial crimes and contribute to the recovery of proceeds of crime. The bill authorizes the Agency to conduct financial crime investigations and establishes roles for both the Attorney General of Canada and provincial Attorneys General.

The CACP therefore encourages Parliament to ensure that the legislation provides a sufficiently clear foundation for collaboration rather than duplication, coordination rather than competition, and added national capacity rather than displacement of existing expertise.

Consultation with provinces and the policing community

A central concern raised within the CACP is the lack of consultation with provincial partners before Bill C-29 was introduced given that the new Agency's concurrent authorities would operate alongside existing provincial jurisdiction. This is particularly significant because financial crime investigations frequently require sustained commitments from specialized investigators, prosecutors, analysts and other resources.

The CACP recommends that the federal government undertake structured consultation with provincial and territorial governments, Attorneys General and policing organizations as the legislation and implementation framework are developed.

Police services themselves should also have a meaningful role in that process. Operational experience is essential to designing mechanisms that will work when multiple agencies have intelligence, investigative or enforcement interests in the same criminal activity. The goal should not merely be to inform partners about how the Agency will operate. It should be to develop the operating model with the organizations that will work alongside it.

Complementing existing police capacity rather than duplicating it

The CACP sees a strong potential role for the FCA as a national coordinating and enabling partner. Canada benefits when federal capacity can be brought to bear on complex financial crime that crosses provincial or international borders, requires specialized expertise, or involves criminal networks operating across multiple jurisdictions.

At the same time, provincial and local police services have developed considerable expertise, investigative capacity and partnerships in this field. The creation of the FCA should strengthen that ecosystem, not inadvertently weaken it.

The CACP's concerns are therefore less about whether Canada needs additional capacity and more about how that capacity will be integrated into the existing policing landscape. The Agency should complement existing work by providing capabilities such as:

- national financial-crime intelligence development;
- coordination and deconfliction of multi-jurisdictional investigations;
- specialized investigative support;
- coordination of national financial-crime threats;
- support for asset identification and recovery;
- connections between police, regulators, financial institutions and other partners; and
- additional capacity where the scale or complexity of an investigation exceeds what an individual jurisdiction can reasonably provide.

This approach is consistent with the CACP's previous position on Canada's National Anti-Fraud Strategy, which called for a national capacity capable of supporting large-scale, multi-jurisdictional investigations while improving coordination and information sharing.

For predominantly local or provincial investigations, the default should be that the FCA supports and complements the police service of jurisdiction, unless there is a clear and operationally justified reason for a different approach.

Clear rules are needed for concurrent investigations

Bill C-29 gives the FCA investigative authority while preserving significant roles for federal and provincial Attorneys General.

From an operational policing perspective, concurrent authority creates an important practical question: What happens when the FCA develops an interest in a matter that another police service has already been investigating for months or years?

The concern is not theoretical. An investigation may begin as a local or provincial matter and later reveal transnational activity, connections to another province or issues that could be characterized as being of national interest. By that point, the police service of jurisdiction may already have invested substantial financial and human resources in the investigation and developed valuable knowledge of suspects, evidence, victims and criminal networks.

The CACP therefore recommends that the implementation of Bill C-29 include a formal deconfliction and case-coordination framework addressing:

1. how agencies notify one another of overlapping investigative interests;
2. how investigative leadership is determined;
3. how existing investigative work and intelligence will be protected and leveraged;
4. how resources and specialized expertise will be shared;
5. how disagreements over investigative responsibility will be resolved; and
6. the circumstances under which responsibility for an existing investigation could move from one jurisdiction to another.

Where an investigation is already well advanced, continuity should be a significant consideration. A change in investigative leadership should be driven by demonstrable operational benefit, not simply by the availability of concurrent federal authority.

Greater clarity around federal prosecutorial jurisdiction and “national interest”

The CACP also believes Parliament should carefully examine the interaction between federal and provincial prosecutorial authorities.

Bill C-29 specifically provides for the powers of the Attorney General of Canada and the Attorney General of a province and provides for a federal *fiat*. This leads to the possibility that federal prosecutorial jurisdiction could become exclusive where the statutory criteria are satisfied, including circumstances involving transnational offending, offending extending across provincial boundaries or matters characterized as being in the national interest. This begs the following question: what constitutes the “national interest” for these purposes?

Greater clarity would benefit police, prosecutors and governments alike.

The CACP recommends that Parliament consider whether the legislation itself, regulations, or publicly articulated implementation criteria should provide greater guidance about the factors informing a national-interest determination. There should also be clear procedures governing situations in which a federal *fiat* affects an investigation or prosecution already substantially advanced within a province.

These mechanisms should promote predictability and coordination between federal and provincial partners and minimize the risk that changes in jurisdiction disrupt an investigation, duplicate effort or fail to recognize resources already invested.

Operational independence must remain fundamental

A new national financial crimes agency will necessarily operate within a broader government policy framework. At the same time, police leaders consider operational independence fundamental to maintaining confidence in law enforcement.

The CACP recommends that the FCA’s governance and implementation framework clearly safeguard the principle that individual investigative decisions and operational priorities are informed by evidence, intelligence, risk and public safety considerations, supported by professional law enforcement expertise. This is particularly important for an agency whose investigations could involve sophisticated economic actors, transnational criminal networks and matters of significant public interest.

Clear accountability and robust oversight are necessary, but accountability should not blur responsibility for operational decisions.

Preserve and leverage existing expertise

The creation of a new federal organization should not unintentionally produce competition for the limited pool of investigators, intelligence analysts, financial crime specialists and other experts already working in the system.

The CACP therefore encourages an implementation model that builds national capability while preserving institutional expertise within provincial, municipal, Indigenous and federal policing organizations.

Partnership arrangements, integrated teams, secondments and shared specialist capabilities are examples of approaches that could help develop the FCA's capacity while maintaining connections to Canada's broader policing community. The CACP's April National Anti-Fraud Strategy submission similarly emphasized the need to leverage existing capabilities and promote a coordinated approach rather than building new structures in isolation.

Proceeds of crime and asset recovery

The recovery of proceeds of crime is expressly part of the FCA's proposed mandate.

The CACP supports strengthening Canada's ability to deprive criminal organizations and financial crime actors of illicit assets. Asset recovery should be treated as an integral part of financial crime enforcement rather than an afterthought.

It is important to note that some provinces already undertake proceeds-of-crime recovery activities and have raised questions about how property recovered through FCA investigations will interact with existing provincial regimes. There is currently great uncertainty over whether recovered proceeds would be distributed among provinces. This issue warrants clarification.

The CACP recommends the development of a transparent proceeds-of-crime framework addressing cases involving joint or overlapping federal and provincial efforts. Among other considerations, that framework should recognize investigative contributions and provide clarity regarding the treatment of recovered assets when provincial or local police services have committed substantial resources to an investigation.

National coordination should produce additional operational capacity

The ultimate measure of the FCA's success should not be the number of investigations transferred to it or the growth of a new federal institution. Instead, success should be measured by whether Canada becomes demonstrably better at identifying, investigating, disrupting and prosecuting sophisticated financial crime and recovering criminal proceeds.

As a result, it is recommended that the FCA particularly focus on gaps that individual police services cannot easily fill themselves: national threat intelligence, cross-jurisdictional coordination, specialized expertise, international connections, deconfliction and additional investigative capacity. The government's proposed FCA should become a partner that police services turn to because it adds capability and connects the system, not because it displaces investigations that are already effectively underway elsewhere.

Conclusion

The CACP supports the objective underlying Bill C-29: Canada needs stronger capacity to address increasingly sophisticated, organized and multi-jurisdictional financial crime.

Our message is not that Canada should step back from building that capacity; it is that we should build it in a way that strengthens the entire Canadian policing system. The FCA has the potential to fill important national gaps in intelligence, coordination, specialized investigative capacity and asset recovery. To achieve that potential, however, its authorities and operating model must be integrated carefully with the responsibilities, expertise and investments of provincial, territorial, municipal, Indigenous and federal policing partners.

Financial crime does not respect jurisdictional boundaries. Our response cannot be constrained by institutional boundaries either. However, effective national coordination does not require the displacement of effective local or provincial action. It requires each partner to bring its authorities, expertise and capabilities to a coordinated national effort.

With greater clarity regarding jurisdiction, deconfliction, prosecutorial authority, operational independence and proceeds of crime, the CACP believes the establishment of a dedicated Financial Crimes Agency can represent an important step toward a stronger and more coordinated Canadian response to financial crime.

The Canadian Association of Chiefs of Police welcomes continued engagement with Parliament and the Government of Canada as Bill C-29 and the Financial Crimes Agency move forward.