



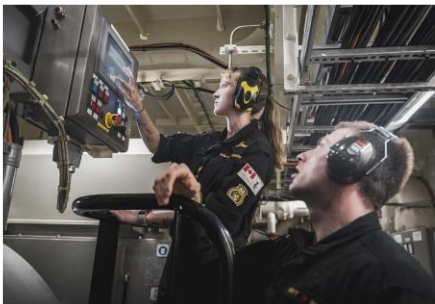
National
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CANADIAN
ARMED FORCES

Department of National Defence and Canadian Armed Forces Red Tape Review Progress Report



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Department of National Defence and
Canadian Armed Forces
Red Tape Review Progress Report

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Context

The Department of National Defence (DND) and Canadian Armed Forces (CAF) are responsible for administering and enforcing regulations related to Canada's national security, defence operations, and the management of the DND/CAF. The regulatory framework overseen by the DND/CAF is designed to ensure the effective defense of Canada's sovereignty, the safety of its citizens, and the country's contributions to international peace and security.

The nature of the regulations within DND/CAF includes the management of military personnel, procurement and use of defense equipment, security clearances, operational conduct, and the protection of sensitive information. These regulations ensure that defence activities comply with national laws, international agreements, and ethical standards.

The overarching regulatory objectives of the DND/CAF include:

- Maintaining operational readiness and effectiveness of the CAF.
- Ensuring the security and protection of Canada's military assets and classified information.
- Upholding legal and ethical standards in all defence-related activities.
- Supporting the welfare and discipline of military personnel.
- Facilitating cooperation with domestic and international partners for collective security efforts.

Through its regulatory role, DND/CAF plays a vital role in safeguarding Canada's national interests and maintaining peace and security both at home and abroad.

Executive Summary

In the past year, DND/CAF has sought to improve its efficiency in responding to regulatory matters to reduce the regulatory burden on CAF members, their families, and Canadians. In April 2025, DND/CAF established the Regulatory Affairs organization to increase efficiency and transparency by creating a strong foundation that standardizes the departmental approach to regulatory development; promote compliance with the [Cabinet Directive on Regulations](#) including the annual publication of the Forward Regulatory Plan; and improve collaboration with other government departments and agencies to ensure government-wide alignment. Ultimately, these efforts will reduce duplication, increase time savings, and streamline processes.

Moving forward, DND/CAF is actively advancing initiatives aimed at reducing red tape and improving efficiency, including plans to improve the administration of the CAF pension plan and grievance system; verifying alignment across [National Defence Act](#) (NDA) provisions to ensure consistency; and aligning regulations with the operational reality of the CAF and government-wide commitments. These improvements aim to reduce duplication, clarify, and consolidate provisions, ultimately saving time and costs for administrators and users of DND/CAF regulations.

Progress Achieved

DND/CAF has taken initial steps to improve its regulatory development process to be more efficient and transparent. This has been achieved through the creation of the Regulatory Affairs organization, which centralizes all regulatory matters within the department.

Item 1: Established Regulatory Affairs Team within DND/CAF

Context:

In April 2025, the DND/CAF launched the Regulatory Affairs organization to be the departmental center of expertise for all regulatory matters within National Defence, aimed at streamlining and standardizing the regulatory development process.

Regulatory Affairs ensures a consistent and correct regulatory process is followed by providing start-to-finish guidance to internal stakeholders to support sound policy development and requirements, approaches, timelines, and approvals. It is also responsible for ensuring departmental compliance with the *Cabinet Directive on Regulations*, notably to conduct regular stock reviews of DND/CAF's suite of regulations and to post the departmental Forward Regulatory Plan. Regulatory Affairs serves as the central point of contact for other government departments and agencies.

Actions:

Foundational Work:

Regulatory Affairs is in the process of completing foundational work which will restore DND/CAF's regulatory compliance and alignment with operational requirements. Notably, it is conducting analysis of regulatory issues within the department spanning decades to identify trends and recurring challenges; engaging other government departments for issues outside of DND/CAF's regulatory scope; facilitating collaboration within DND/CAF by providing early guidance on policy development, stakeholder consultations, and regulatory readiness; ensuring business continuity as the corporate repository for all regulatory matters within DND/CAF; and identifying and eliminating overlapping regulations or redundant requirements within the department.

Intradepartmental Coordination and Engagement

Regulatory Affairs is actively engaging with intradepartmental stakeholders to enhance internal coordination and to provide clear guidance to ensure regulatory issues are resolved in a consistent and efficient manner. Specifically, it is developing and distributing clear regulatory guidance and checklists to all relevant stakeholders; publishing and maintaining an internal dashboard to keep the Defence Team apprised of current regulations within DND/CAF; developing a shared repository of regulatory documents and best practices; implementing a tracking system to monitor regulatory compliance and progress; and conducting training sessions to enhance regulatory knowledge and capabilities across DND/CAF.

Forward Regulatory Plan

Regulatory Affairs will ensure departmental compliance with the *Cabinet Directive on Regulations* concerning the publication of the departmental Forward Regulatory Plan by identifying upcoming regulatory proposals within DND/CAF that must be included. The Forward Regulatory Plan provides stakeholders with a transparent roadmap of upcoming regulations, allowing them to anticipate, prepare, and engage with the rulemaking process.

To further strengthen transparency and oversight, Regulatory Affairs is considering the options for presenting the Forward Regulatory Plan and status reports to senior leadership on a routine basis. An initial dashboard will be shared with senior leadership, with future updates provided as supplementary material. This will allow leadership to prioritize and track initiatives, and provide additional support where warranted, ultimately enhancing departmental coordination and regulatory effectiveness.

Outcomes:**Improved Efficiency**

The actions taken by Regulatory Affairs will ultimately lead to improved efficiency in responding to regulatory matters. Specifically, it will lead to better regulatory governance within the department, such as ensuring compliance with the *Cabinet Directive on Regulations*, and the timely resolution of regulatory matters. Regulatory Affairs will improve efficiency through increased collaboration with external stakeholders such as TBS, PCO, and other government departments to ensure government-wide alignment.

Increased Transparency

Regulatory Affairs will ensure transparency in DND/CAFs regulatory updates, through the Forward Regulatory Plan that will be posted annually.

Next Steps

DND/CAF is actively advancing initiatives aimed at reducing red tape, including plans to improve the effectiveness of the administration of the CAF pension plan and CAF Grievance system; alignment across NDA provisions to ensure consistency, as well as ascertaining that regulations are aligned with operation reality and government wide commitments.

Short-term initiatives include:

Item 1: Regulations Amending the *Canadian Forces Superannuation Regulations*

Context:

The [*Canadian Forces Superannuation Regulations*](#) (CFSR), which enables the implementation of the [*Canadian Forces Superannuation Act*](#) (CFSA) by outlining the benefits, conditions and eligibility criteria, is being amended to reflect changes made to the CFSA. Provisions related to service buy back (elective service), surrender of benefit, and supplementary death benefits will be removed from the CFSA and replaced with the authority for the Governor-in-Council to make regulations in these areas. The corresponding updates to the regulations will allow for efficient and accurate administration of pensions and will assist CAF members in making sound financial decisions regarding their pensions and receiving pensions properly.

Actions:

In Fall 2025, DND/CAF aims to complete the transfer of these provisions from the CFSA to the CFSR. Concurrently, several regulatory provisions are being amended to eliminate duplication, update outdated and obsolete references and align the CFSR structure to ensure consistency with the revised CFSA.

Expected Outcomes:

Transferring these provisions from CFSA to CFSR preserves the core pension plan design and maintains Parliamentary oversight while allowing technical rules to be updated through future regulatory amendments without amending the CFSA, which requires more time than regulatory amendments, potentially causing delays that may impact CAF members. This approach provides greater flexibility to adjust rules in response to evolving operational and demographic needs in a timely manner. These amendments would support timely, transparent, and effective pension management for CAF members.

Item 2: Order in Council to bring into force a provision amending the *National Defence Act*

Context:

The NDA is the primary piece of legislation governing the Canadian Armed Forces and the Department of National Defence and includes the Code of Service Discipline, the foundation of the military justice system. The NDA includes governing service offences in relations to the *Sex Offender Information Registration Act* (SOIRA).

A subsection was added to SOIRA to increase reporting obligations for registered sex offenders convicted of an offence against a child, requiring them to notify a registration center of travel plans or changes in residence.

A section of the NDA currently refers to a list of SOIRA reporting obligations (but does not include the new SOIRA subsection). When those listed obligations are breached, the provision permits a court martial to accept a signed certificate as evidence. This allows the signed certificate to be used at court martial without needing to prove the signature, such as by the signatory testifying in person.

Actions:

Bring into force a provision that amends the NDA to add the new subsection of the SOIRA to the list of reporting obligations which could be addressed through this streamlined court martial process when breached. Without

the amendment, a signed certificate would not be accepted on its own as evidence if the new reporting obligations are breached. The amendment is expected in Fall 2025.

Expected Outcomes:

Allowing a court martial to accept certificate evidence would streamline the process, saving time.

The amendment to the NDA would align it with a similar provision in the Criminal Code. Alignment would ensure that certificate evidence may be used in similar situations during proceedings in both the military justice and civilian criminal justice systems, ensuring similar evidence procedures in these circumstances.

Item 3: Regulations Amending the Queen's *Regulations and Orders* for the Canadian Forces (Chapter 7 Grievances)

Context:

The *Queen's Regulations and Orders* (QR&O) are a comprehensive set of regulations and orders that govern the CAF. The QR&O Chapter 7 governing the CAF grievance system is outdated, resulting in inconsistencies and a lack of coherence. The rigid regulatory framework restricts timely updates, hindering responsiveness to evolving needs, and many provisions are overly complex, redundant with the NDA, and administratively burdensome for grievors. The duplication makes it more difficult to navigate, placing an unnecessary administrative burden on the griever. The griever is already experiencing stress and having to navigate an outdated system causes more unnecessary mental stress. Furthermore, grievances related to discrimination and sexual incidents are currently not mandatorily referred to the Military Grievance External Review Committee (MGERC), unlike those involving harassment or racist conduct, causing inconsistent treatment and lack of standardization. These changes are meant to improve oversight and ensure these sensitive matters are handled consistently and fairly. Additionally, all financial grievances, regardless of monetary value, are automatically referred to the MGERC, overloading its resources with low-value cases such as \$10 and slowing the overall grievance resolution process.

Actions:

The amendments aim to simplify and streamline the CAF grievance system by consolidating and removing redundant QR&O provisions that are duplicated from the NDA. The amendments also seek to enhance the integrity and transparency of the process by ensuring all grievances involving discrimination or sexual incidents receive independent review, and aligning regulatory provisions with operational policies such as transitioning Article 7.04 (Oral Complaint) to internal policy. Finally, the amendments would establish a threshold for financial grievances referrals to the MGERC. DND/CAF is expected to complete these amendments in the next year.

Expected Outcomes:

The amendments would reduce confusion and improve accessibility for the CAF grievance system, resulting in a positive impact for all users of the CAF grievance system. It would also improve coherence and flexibility, by allowing for quicker updates through policy instruments. Overall, the system will operate more efficiently while maintaining fairness for all CAF members by reducing the number of financial grievances referred to the MGERC, allowing the MGERC to respond faster and more effectively to financial grievances above the established threshold and other important grievances related to discrimination, sexual incidents, harassment and racist conduct.

Item 4: Regulations Amending the Queen's *Regulations and Orders* for the Canadian Forces (Chapter 21 Boards of Inquiry and Summary Investigations)

Context:

Chapter 21 Section 6 of the QR&O governs Boards of Inquiry (BOI) and Summary Investigations (SI) into personal injuries and deaths in the CAF. The chapter is currently outdated and misaligned with modern operational realities and mental health practices. Mandatory investigations into minor self-inflicted injuries required by the current QR&O, especially those investigations conducted by non-medical personnel, can feel

punitive and misrepresent psychological distress as a disciplinary issue rather than a health concern. These investigations were previously carried out by individuals who may have been the member's co-workers, raising concerns about privacy and impartiality, and contributing to reluctance among affected members to return to the workplace. The QR&O also continues to impose mandatory findings, which are elements that no longer influence benefit decisions since Veterans Affairs Canada (VAC) assumed full responsibility in 2006, causing confusion and administrative burden for CAF members, families, and legal professionals. Additionally, a translation inconsistency in QR&O 21.46(3) between English and French versions contributes to misinterpretation. These issues have resulted in disputes and dissatisfaction, reinforcing the need for regulatory modernization to improve clarity, compassion, and efficiency in administrative processes.

Actions:

Between 2018 and 2023, DND/CAF established a working group to review the requirements listed in the QR&O, and provided recommendations to remove outdated requirements and eliminate mandatory findings, while correcting a French translation. DND/CAF is looking to amend the regulations to reflect these recommendations by removing the mandatory finding and investigation requirements and update the inconsistent translation in Fall 2025.

Expected outcomes:

The amendments would reduce the administrative burden, improve mental health support, and minimize stigma and harm to CAF members by eliminating unnecessary investigations into minor self-inflicted injuries, particularly those investigations conducted by non-medical personnel. The amendments would also clarify that internal investigations do not affect VAC benefits or eligibility, providing reassurance to CAF members. The amendments would result in more streamlined processes, fewer legal disputes, and more compassionate handling of mental health incidents while improving regulatory clarity and promoting better outcomes for CAF members, veterans, and their families without introducing new costs. Finally, the amendments would ensure consistency and reduce misinterpretation.

Item 5: Regulations Amending the *Queen's Regulations and Orders for the Canadian Forces* (Chapter 3 Table 3.01 and Article 3.08)

Context:

The QR&O Volume I, Chapter 3 – Rank, Seniority, Command and Precedence, Table 3.01; a table listing rank designations across the CAF, including gendered titles under review for neutrality, while QR&O 3.08 defines the appointment of Master Corporal and is proposed to include the RCN's equivalent, Master Sailor. Both Table 3.01 and Article 3.08 contain gendered language that does not align with federal commitments to gender equality, inclusivity, and Gender-Based Analysis Plus (GBA Plus). Since the release of Strong, Secure, Engaged in 2017, Canada's defence policy has guided the DND/CAF toward becoming a more agile, adaptable, and inclusive force, enabling the DND/CAF to respond effectively to a changing global landscape. These amendments support the CAF's goal of increasing representation of women and fostering a respectful, inclusive environment.

Actions:

In 2020, internal consultations within DND/CAF assessed the impact of gendered rank designations on diverse groups, leading to the immediate operational adoption of gender-neutral language across DND/CAF. DND/CAF would amend QR&O Table 3.01 to replace gendered ranks with gender-neutral alternatives, such as changing Leading Seaman to Sailor 1st Class and Guardsman to become Footguard. Additionally, DND/CAF would amend QR&O Article 3.08 to formally recognize "Master Sailor" as the Royal Canadian Navy's (RCN) equivalent to "Master Corporal," addressing a longstanding omission in the rank structure. The amendments to QR&O 3.01 & 3.08 would modernize rank designations across the CAF, eliminating gendered language and reinforcing the institution's commitment to diversity, equity, and inclusion. DND/CAF is expected to complete these amendments in Spring 2026.

Expected outcomes:

These amendments would lessen administrative complexities and errors by aligning regulations with common practice and language, resulting in more streamlined and simplified administrative procedures. These amendments would also improve morale, reduce subtle discrimination, and enhance unit cohesion, particularly for women and gender-diverse members. The amendments align with both the original *Strong, Secure, Engaged* defence policy and its renewed vision, *Our North, Strong and Free*, which continue to mandate the integration of GBA Plus across all defence activities to promote gender equality and inclusive practices. Additionally, the amendments support CAF's Employment Equity goal of achieving 25.1% representation of women by 2026.

Item 6: Regulations Amending the Title of the *Queen's Regulations and Orders* and other consequential amendments**Context:**

On 8 September 2022, her Majesty Queen Elizabeth the Second passed away and the Crown of Canada vested in His Royal Highness Prince Charles Philip Arthur George. On 10 September 2022, the Governor General of Canada proclaimed that His Royal Highness Prince (HRH) Charles had acceded to the throne as His Majesty King Charles the Third, by the Grace of God of the United Kingdom, Canada and His other Realms and Territories KING, Head of the Commonwealth, Defender of the Faith.

Consequently, the English titles of the QR&O, the Queen's Regulations and Orders for the Canadian Military Colleges (QR (Canmilcols)), and the Queen's Regulations and Orders for Canadian Cadet Organizations (QR (Cadets)) need to be amended to reflect the transition from the Queen to the King as the sovereign. Furthermore, references to "Her Majesty" and "The Queen" within these regulations will need to be amended accordingly. Finally, references to the English title of the QR&O in other statutes and regulations will need to be reviewed and amended accordingly to ensure consistency and legal coherence.

Actions:

In Spring 2026, DND/CAF aims to submit for approval a regulatory package to amend the respective regulations.

Expected outcomes:

Ultimately, these amendments will ensure clarity and alignment of the QR&O series, QRcanmilcols, QRCadet, and other regulations, with the appropriate monarch title.

Medium to Long-Term initiatives will include:

- Full review of the *Canadian Forces Superannuation Regulations* and *Reserve Force Pension Plan Regulations* to identify paper-based processes which can be streamlined.
- The Regulatory Affairs organization will engage business process analysts and employ artificial intelligence where it is possible to conduct reviews with the aim of streamlining processes and reducing reliance on outdated methods of capturing information
- Full review of the *Queen's Regulations and Orders* and mapping of each regulation and order to Office of Primary Interests
 - OPIs will provide guidance on what belongs in QR&Os, Defence Administrative Orders and Directives (DAODs), Standard Operating Procedures (SOPs), or general guidance so that follow-on activities can be planned, tracked and monitored across the department; and
 - Every effort will be made to push approvals and authorities to the lowest appropriate level to allow for more efficient updates to policies and regulatory instruments.