

November 30, 2009

Paul Saint-Denis, Senior Counsel
Criminal Law Policy Section
Department of Justice
284 Wellington Street
Ottawa, ON K1A 0H8

RE: Proceeds of Crime, Canada Gazette, Part I, Vol. 143, No. 44, October 31, 2009

Dear Mr. Saint-Denis:

On behalf of the Canadian Chamber of Commerce and the Canadian Intellectual Property Council (CIPC), I am writing in support of the government's proposal that would amend the Regulations Excluding Certain Indictable Offences from the Definition of "Designated Offence" (the Regulations).

In 2008, the Canadian Chamber of Commerce launched the CIPC to better focus our advocacy efforts on the problems with Canada's intellectual property rights (IPR) system and suggest tangible solutions. In February of this year, the CIPC released a comprehensive paper entitled: *A Time for Change: Toward a New Era for Intellectual Property Protection in Canada* detailing the deficiencies in Canada's IPR regime.

This proposed change to the designated offences will improve Canada's ability to protect intellectual property rights and build on government commitments from 2007 to take action. This change will also stem copyright offences by allowing the proceeds of crime from copyright offences to be seized under the Criminal Code.

While this is definitely a step in the right direction, both the Canadian Chamber of Commerce and the CIPC look forward to continuing to work with the government to see even more improvements to Canada's current intellectual property rights system.

Sincerely,



Shirley Ann George
Senior Vice-President, Policy

cc. Bob Weese, Chair, CIPC
Graham Henderson, Vice-Chair, CIPC

420 - 360, rue Albert St.
Ottawa, Ontario
K1R 7X7

613.238.4000
613.238.7643

www.chamber.ca
info@chamber.ca