



April 21, 2026

Committees Branch
Legislative Assembly of Manitoba
Room 251, 450 Broadway
Winnipeg, MB R3C 0V8
Via email: committees@mbassembly.ca

To Whom It May Concern,

On behalf of the Association of Manitoba Municipalities (AMM), I am writing to provide some comments regarding Bill 51: *The Public Sector Artificial Intelligence and Cybersecurity Governance Act*.

The AMM acknowledges the increasing use of artificial intelligence systems in the delivery of public services across the province. While some municipalities have begun implementing AI tools to support municipal operations, the pace of technological advancement continues to accelerate. As these technologies evolve, so too do the associated cybersecurity risks. In this context, the AMM welcomes the development of a clear, province-wide framework to help ensure the responsible and secure use of technology in the public sector.

The AMM also thanks the Department for meeting with our organization on April 2 to provide a technical briefing on the proposed legislation. We appreciate the clarification that the Bill is intended to establish a framework, rather than prescribe specific requirements at this stage, and to support a more consistent reporting process. However, we note that many key elements of the framework are to be determined through future regulations. This approach introduces a level of uncertainty, as requirements may become complex, costly, and subject to change over time. While we value the assurances provided, the AMM respectfully requests that the Department continue to work closely with our organization and municipalities as the bill advances and the regulatory framework is developed. The AMM emphasizes the need for a flexible approach that recognizes the distinct roles and capacities of different public sector entities, including municipalities.

Further, in August 2025, the Office of the Auditor General released an investigation report concerning Manitoba municipalities and the Department of Municipal and Northern Relations. Among its recommendations, the Auditor General called for the Department to work collaboratively with the AMM to develop guidance on baseline cybersecurity controls for municipalities, including the implementation of oversight



processes to monitor compliance. Therefore, the AMM recommends that the Department of Innovation and New Technology collaborate closely with the Department of Municipal and Northern Relations to ensure forthcoming legislation complements existing departmental efforts and reflects municipal needs. The AMM also appreciates the Province's commitment to continued collaboration and engagement with our association and municipalities as this process moves forward.

Thank you for the opportunity to provide these comments. We look forward to continued collaboration with the Province to ensure that the implementation of Bill 51 is practical and reflective of municipal realities.

Respectfully and sincerely,

Denys Volkov
Executive Director

cc: Hon. Mike Moroz, Minister of Innovation and New Technology
Hon. Glen Simard, Minister of Municipal and Northern Relations
Deputy Minister Tyler Gooch, Minister of Innovation and New Technology
Deputy Minister Maurice Bouvier, Manitoba Municipal and Northern Relations