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Public Inquiry Into Foreign Interference
in Federal Electoral Processes and
Democratic Institutions

Enquête publique sur l'ingérence étrangère
dans les processus électoraux et les
institutions démocratiques fédéraux

Interview Summary: Isabelle Mondou, Amy Awad

Senior officials from the Department of Canadian Heritage were interviewed by Commission Counsel on July 2, 2024. The interview was held in a secure environment and included references to classified information. This is the public version of the classified interview summary that was entered into evidence in the course of hearings held *in camera* in July and August 2024. It discloses the evidence that, in the opinion of the Commissioner, would not be injurious to the critical interests of Canada or its allies, national defence or national security.

Notes to Readers:

- Commission Counsel have provided explanatory notes in square brackets to assist the reader.

1. Roles and Relation to Foreign Interference (“FI”)

- [1] Isabelle Mondou was appointed the Deputy Minister of the Department of Canadian Heritage (“PCH”) in May 2021. She joined PCH on October 22, 2018 as Associate Deputy Minister, and served in this position for 18 months. From April 2020 to April 2021, she served at the Privy Council Office (“PCO”) as the Deputy Minister of Communications for the Government of Canada’s Covid-19 response.
- [2] Amy Awad was appointed the Director General, Digital and Creative Marketplace Frameworks in August 2023. As Director General, she is responsible for leading legislative and policy development in relation to the information ecosystem, including the *Copyright Act*, the *Broadcasting Act*, the *Online News Act*, and Bill C-63 [proposed legislation introduced by the Government of Canada to create the *Online Harms Act*, which would impose duties on social media platforms to protect users from harmful content, create design features to protect children, and make non-consensually distributed intimate images and child sex abuse material inaccessible]. She also

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facilitates international engagement in the digital media sphere and leads initiatives to protect Indigenous arts and cultural expressions.

- [3] Ms. Awad explained that most of PCH's work in the space of foreign interference in democratic processes is in relation to promoting a healthy information ecosystem. An objective of these initiatives is to make the Canadian public more resilient against mis- and dis- information ("**MIDI**").
- [4] Ms. Mondou analogized PCH's work related to foreign interference in democratic processes to a funnel. At the top, PCH works to build a solid base of citizen resilience, by supporting Canadian media, promoting social cohesion and multiculturalism, and by combatting online harm. At the narrow end of the funnel, PCH is involved in funding projects and research that aim to tackle specific harms stemming from foreign interference.
- [5] Ms. Mondou said it is important to promote a diversity of viewpoints in Canadian media. Diverse sources of information help Canadians detect MIDI. Also, citizens need reliable sources of information to be in a position to make informed choices. As such, a strong and independent media ecosystem is essential to a healthy, functioning democracy.

2. Digital Citizen Initiative

2.1. Origins and Structure

- [6] [The Digital Citizen Initiative ("**DCI**") is a multi-component strategy that aims to support democracy and social cohesion by building citizen resilience against online disinformation, and by building partnerships to support a healthy information ecosystem. It comprises two components: the Digital Citizen Research Program ("**DCRP**"), which includes the Digital Citizenship Contribution Program ("**DCCP**") and the Diversity of Content Online ("**DOCO**") initiative].
- [7] Ms. Mondou explained that discussions that occurred before and after the 2019 federal general election helped to design and adapt the functioning of the DCI. At the time, Minister Karina Gould [the Minister of Democratic Institutions] examined Canada's Plan to Protect Democracy to determine how to best combat FI. As part of this plan, PCH

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was found to be uniquely situated to support civil society organizations, which were seen as important players in combatting the spread of MIDI.

- [8] Ms. Mondou said that in the lead up to the 2019 election and after the launch of the DCI, PCH's work on MIDI included: (i) funding research aimed at understanding the MIDI phenomenon in the Canadian context; and (ii) funding projects to better equip citizens to be resilient to MIDI. As part of the Diversity of Content Online (DOCO) component of the DCI, PCH also began to liaise with social media platforms, civil society organizations, and international partners, to create a set of principles that all parties could operationalize to promote a diversity of content online.
- [9] Ms. Awad explained that the DCI is made up of: (i) the DCRP, which includes PCH's policy work in relation to online harms and the DCCP, which funds research and tools development designed to help build societal resilience against MIDI; and (ii) the DOCO initiative, a multistakeholder international working group designed to support availability and access to a diversity of content, including factual content, online.
- [10] Ms. Mondou stated that no country is immune to disinformation. MIDI is a complex and adaptable phenomenon, and it can attach itself to any information environment.

2.2. MIDI and the Canadian Charter of Rights and Freedoms

- [11] Ms. Awad explained that the DCI does not have a formal definition of MIDI. However, misinformation and disinformation can be distinguished based on intent. If a piece of false or misleading information is spread deliberately, it is considered disinformation. If a piece of false or misleading information is spread without knowledge of its falsehood, it is considered misinformation. Identifying MIDI can be difficult, practically speaking. Any policy must account for the need to balance freedom of expression against the harms caused by MIDI.
- [12] Ms. Mondou noted that the Canadian Charter of Rights and Freedoms protects Canadians' freedom of expression. For that reason, the DCI aims to inform the public and equip them with the tools they need to make informed decisions for themselves.

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2.3. Expansion in Scope and Funding

- [13] Ms. Mondou said that in the DCI's first phase in the lead-up to the 2019 federal election, PCH was able to use existing PCH programs to build citizen-focused activities and foster resilience against MIDI and other online harms. Many of these activities addressed MIDI as an ancillary effect, rather than as their main objective. This pragmatic approach of relying on existing programs was due in part to the fact that the DCI did not have its own program authorities and funding before the 2019 federal election.
- [14] The DCI received \$19.4 million in funding over four years from Budget 2019 to implement the DCI's second phase. [It was allocated almost \$4.5 million through the Emergency Support Fund for Cultural, Heritage and Sport Organizations during the COVID-19 pandemic. It was renewed until 2024-25 and received an additional \$31 million in the 2022 Fall Economic Statement.] Of the \$19.4 million, \$2.4 million was earmarked for a joint initiative with the Social Sciences and Humanities Research Council ("**SSHRC**") called the "PCH-SSHRC Initiative for Digital Citizen Research" [this initiative provides funding to promote Canadian research that will develop a better understanding of the impacts of online disinformation in Canada to inform programs and policies; build Canada's capacity to conduct research on and related to countering online disinformation and other related online harms; and help foster a community of research in the digital citizenship and online disinformation space in Canada].
- [15] Ms. Mondou said that the initiative creates a network of researchers who explore MIDI and its effects. The DCI can draw upon this network as needed. Ms. Awad said that the initiative is generally focused on MIDI rather than FI.
- [16] [The DCI has funded over 140 projects since its inception.] The DCI's funding will sunset in March 2025. The DCI currently has agreements in place to support programs aimed at combatting MIDI, but these agreements will also terminate in March 2025. Ms. Mondou said that permanent funding would improve the DCI's ability to address MIDI-related harms.

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2.4. Local Journalism Initiative (“LJI”)

- [17] [The LJI was launched in 2019 as a five-year program that supports original civic journalism covering the diverse needs of underserved communities in Canada].
- [18] Ms. Mondou explained that the Local Journalism Initiative was launched because local newspapers and other local news sources were closing at an alarming pace. A “news desert” is a danger to democracy, because it undermines the ability of citizens to remain informed. Citizens have less agency over their choices when they lack access to adequate information.
- [19] The LJI makes funding available to eligible Canadian media organizations to hire journalists or pay freelance journalists to produce civic journalism for underserved communities. Ms. Mondou noted that the LJI has funded as many as 400 positions for journalists in underserved communities across Canada. The LJI, which was renewed recently, was created following a PCH-funded report, *The Shattered Mirror: News, Democracy and Trust in the Digital Age*, produced by the Public Policy Forum. The report explored the impacts of dwindling local journalism. The government used the analysis and recommendations in the report to craft policy initiatives that would create more positions for local journalists, offer a tax credit to individuals who subscribe to a digital newspaper, create a tax benefit to compensate for the salaries of journalists [introduced by the Government of Canada in Budget 2019], and craft Bill C-18 [the Online News Act, which requires dominant platforms to compensate media organizations if they host Canadian news content on their platforms].

2.5. DCI Governance

- [20] Commission Counsel directed the witnesses to a diagram called “Digital Citizen Initiative: Program Workflow”.¹
- [21] Ms. Mondou explained that the DCI’s governance structure consists of two components: (i) the Consultative Body reviews applications submitted to the DCCP for suitability and relevance to the objective of countering online disinformation and other online harms,

¹ CAN042302.

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raises awareness on projects proposals that may align with their own programs, and reviews the funding priorities developed by PCH for each new call for proposals; and (ii) the Steering Committee frames the agenda of the research component of the DCI (including the DCCP and the PCH-SSHRC Initiative for Digital Citizen Research). This includes reviewing and providing input on upcoming DCCP funding priorities. She added that Canada's security and intelligence ("**S&I**") agencies are included in the Consultative Body, and can offer thoughts and feedback on applications without specifically sharing classified information when doing so. Civil society organizations sit on the Steering Committee and help to define priorities for the various programs. The Steering Committee, which is composed of external participants, does not have access to intelligence from the S&I community.

- [22] Ms. Mondou acknowledged criticism expressed in an evaluation of the program that the Consultative Body was too large to facilitate effective coordination and consultation when reviewing applications, and that sometimes, due to its diverse membership, some members had little to no input to give on applications for funding. A series of recommendations and an action plan have been developed in response to this evaluation. PCH has accepted all the recommendations of the evaluation, including revisions to the Consultative Body's and Steering Committee's Terms of Reference.
- [23] Ms. Awad added that the PCO Democratic Institutions Secretariat ("**DI**") has started hosting monthly meetings at the director level that PCH attends. The meetings are expected to provide an opportunity to disseminate information about the DCI's projects. PCH may also receive information in these meetings that helps inform which priorities they should pursue under the DCI.

2.6. Digital Citizen Contributions Program ("**DCCP**") Priorities and Projects

- [24] [When the DCCP launches a call for proposals, PCH identifies priorities, which change from year to year].
- [25] Ms. Awad explained that to identify relevant priorities, the DCI conducts a scan of public sources and previous PCH- or DCI-led projects. The DCI aligns these priorities with the Government of Canada's priorities, and then takes their priorities to the Consultative

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Body and the Steering Committee. While the DCI does not specifically consult with diaspora communities when creating priorities, the Steering Committee can bring forward these perspectives.

- [26] Commission Counsel referred the witnesses to a memorandum to Minister Pascale St. Onge [the Minister of Heritage] about the DCCP Call #5 Priorities.² [The DCCP supports third-party organizations undertaking research and carrying out learning activities to help Canadians become more resilient to online disinformation and other forms of harmful content. This memorandum refers to the DCCP preparing to launch its fifth regular call for proposals in Fall 2023, and seeks approval of seven different priorities. The seventh priority makes explicit reference to developing tools to build resilience to MIDI from foreign governments, such as the People’s Republic of China (“**PRC**”).]
- [27] When asked why there was not previously a specific focus on foreign interference, Ms. Awad explained that the DCCP initially conducted its work in a general way, with the goal of understanding the landscape of online harms and equipping the public to defend itself against these harms. The DCCP later added a focus on certain priorities in order to tackle specific harms.

2.7. Evaluating Projects and Giving Feedback

- [28] Ms. Awad said the DCCP funds projects with clear objectives and concrete impacts. If a project is research-based, the project proposal must explain how the research will have a practical impact on the online research information space. Typically, the project proposal will set out a methodology for measuring its effectiveness, and the project leaders will report results and findings to the DCCP. Effectiveness is measured against the goals of the specific project. Sometimes this evaluation looks at how many people the project reached, and other times it may be about targeting a specific community.
- [29] Before COVID, the DCCP hosted conferences for all applicants [including projects not approved for funding] to allow successful recipients [projects approved for funding] to share insights. Post-COVID, the DCCP has ceased hosting the conference. Ms. Awad

² CAN044734.

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explained that the DCCP relies first on the recipient to disseminate its findings to civil society organizations, academia and the government. Secondly, PCH has an online webpage where all the projects' information is available, but PCH is hoping to make this online page easier for the public to navigate. Ms. Awad said there was "room for improvement" in how the DCCP disseminates the results of the projects they have supported.

[30] Ms. Awad said that the PCH website is available in English and French, but not in any other language. Ms. Mondou said this is partially because PCH has limited resources.

2.8. Projects Approved in 2024

[31] [Three examples of projects that were approved for funding in 2024 under the Call # 5 priorities are: (i) the "Canadian Digital Defenders Collective", a citizen-focused project aimed at strengthening the cognitive resilience of Canadians to online disinformation, hate speech, and foreign influence threats, by providing one-day training sessions in various cities, offering briefings to Canadian federal and provincial officials, law enforcement and Parliamentarians; (ii) "Strengthening Community Resilience to Foreign Interference," a research project focused on strengthening Canada's understanding of foreign influence, disinformation, and transnational repression campaigns originating from the PRC; and (iii) "Disinformation in Canadian Chinese-language Media," a research project focused on foreign interference in Canadian Chinese-language media coverage and its impact on Chinese diaspora communities in Canada].

3. Interdepartmental Engagement

3.1. Federal-Provincial Engagement

[32] Ms. Mondou noted that MIDI is not just a federal government issue. The provinces and territories are also affected and have a role to play. For example, early education (which falls under provincial jurisdiction) on disinformation and other online harms is essential to creating an informed citizenry. To facilitate dialogue with the provinces, PCH leverages mechanisms like meetings with provincial and territorial Ministers and Deputy Ministers responsible for culture and heritage. For example, MediaSmarts was invited

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by Minister St-Onge to present at the recent Federal Provincial Territorial meeting of Ministers of Culture.

3.2. Other Information Sharing

- [33] Ms. Awad noted that PCH shares and receives information at the PCO-DI monthly meetings. In addition, the Consultative Body, made up of representatives from PCH and over 21 other federal government departments and agencies, facilitates information sharing.
- [34] Ms. Mondou explained that PCH is a member of various inter-departmental committees, whose members include PCO-DI, PS, GAC, and the Department of Justice, among others. PCH is not a standing member of Canada's national security governance committees, but has been invited to sit in on certain national security committee meetings in the past when those meetings involved online disinformation, as well as other issues relevant to PCH's mandate. The department now has more interactions with the national security community than it did in 2018.
- [35] PCH co-chairs a committee on building healthy communities. Ms. Awad added that PCH also participates in an interministerial multistakeholder working group on open government.

4. Legislative and Policy Developments

4.1. Bill C-63 (Online Harms Act)

- [36] Ms. Awad said that PCH hosted roundtables across the country and benefited from the advice of an external expert committee in the development of Bill C-63 [Part 1 of which would enact the *Online Harms Act*]. PCH met with Indigenous groups and other communities that tend to be particularly impacted by online harms.
- [37] The goal of Part 1 of Bill C-63 is to make online platforms accountable for online harms. PCH determined that Bill C-63 would not specifically include MIDI as one of the types of "harmful content" addressed by the legislation. However, MIDI is captured to the extent that MIDI content also falls into one of the 7 categories of "harmful content". Ms. Mondou explained that this approach was selected for three reasons. First, Bill C-63

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already covers significant new ground. Moreover, in developing Bill C-63 it was critical to appropriately balance any legislative action with freedom of expression. Including MIDI as one of the types of “harmful content” addressed by the Bill would have exacerbated the extent to which freedom of expression was engaged by the Bill. Second, there are risks to having the GoC legislate MIDI. The GoC should not present itself as the ultimate arbiter of who is telling the “truth” in the online space. Third, PCH is still monitoring how other jurisdictions legislate around MIDI to learn best practices.

4.2. Bill C-18 [The Online News Act]

- [38] Ms. Mondou explained that Canada’s Bill C-18 [now the *Online News Act*] was modelled after Australian legislation [the *News Media and Digital Platforms Mandatory Bargaining Code*. Both pieces of legislation aim to ensure that large online platforms compensate news businesses when their content is made available on the platforms’ services]. Canada sought to introduce more transparency with Bill C-18, whereby an independent regulator, the Canadian Radio-television and Telecommunications Commission (“**CRTC**”), would make decisions about exemptions from the mandatory bargaining framework based on information received from the news organizations and the platforms. Ms. Mondou expressed that this transparency helps to protect the independence of the media. Ms. Mondou added that broadcasters are also able to bargain under the *Online News Act*.
- [39] Ms. Mondou acknowledged opposition from certain platforms when pursuing legislative action. For example, Meta [the company that owns and operates Facebook, Instagram, Threads, and WhatsApp] decided to withdraw access to news media on its platforms in Canada in an effort to avoid being subject to the framework.
- [40] Ms. Mondou agreed that Canada’s youth rely on social media as their main source of news³. A study suggests that, after Meta withdrew Canadian news from its platforms, some people started going back to the originating media outlet as a result. A 2023 study

³ Commission counsel referred Ms. Mondou to a statistic outlined in CSE’s *2023 Update on Cyber Threats to Canada’s Democratic Process*, which reads: “In 2019, almost 50% of Canadians aged between 18 and 24 relied on social media as their main source of news” [p. 15].

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by Apptopia, a market intelligence firm, reported a significant increase in news app downloads and daily users following the Meta ban.

- [41] Ms. Mondou cautioned against relying on foreign-owned platforms as an exclusive news source. Ms. Awad added that the DCI is promoting initiatives to increase youth media literacy.

4.3. Broadcasting Act

- [42] [The Minister of PCH is responsible for the *Broadcasting Act*, which provides the CRTC with the powers and tools to regulate and supervise the broadcasting system.]
- [43] The CRTC authorizes the distribution of non-Canadian services in Canada via the list of non-Canadian programming services and stations authorized for distribution in Canada (the "List") [the List sets out which non-Canadian programming services and stations are authorized for distribution in Canada by Canadian cable and satellite companies]. Ms. Mondou said that when the war in Ukraine started, the CRTC reviewed the Russian media network "RT" (formerly known as Russia Today) and "RT France" to determine whether they should be removed from the List. The review was initiated at the request of the Governor-in-Council pursuant to section 15 of the *Broadcasting Act*. The CRTC determined that RT's programming was not in the public interest and not in line with the policy objectives of the *Broadcasting Act* and removed it from the list. The CRTC is currently considering complaints about Chinese-language broadcasting services.
- [44] There is no equivalent process for online streaming services since there is no real authorization for non-Canadian online streaming services to operate in Canada in the first place. Ms. Awad noted that Bill C-281 [a private member's bill that would make amendments to the *Broadcasting Act* that prohibit the issue, amendment, or renewal of a license to a broadcaster that may be vulnerable to a foreign national or entity declared of committing genocide or subject to sanctions under the Sergei Magnitsky Law] is before the Senate.

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5. PCH and the Security and Intelligence Community

- [45] Ms. Mondou receives intelligence on a need to know basis. While she needs to be aware of what is going on in the S&I community as Deputy Minister, she does not necessarily need the specific intelligence. Open-source material and public reporting from CSE help her understand the general threat landscape. Ms. Mondou is of the view that more information is shared with PCH by the S&I community than in the past.
- [46] Ms. Mondou attends on an ad hoc basis DMCIR meetings that relate to PCH's mandate and projects. Attending these meetings has been helpful, and has allowed PCH to flag policies and projects for discussion. Although Ms. Mondou was not familiar with specific FI related intelligence, the content of the DMCIR discussions was not entirely surprising.
- [47] Ms. Mondou has also been invited to the Deputy Ministers' Operational Committee ("**DMOC**"). PCH is not a member of DMOC, but may attend when discussions relate to PCH's work.

6. Monitoring the Domestic Information Ecosystem

- [48] [The Canadian Digital Media Research Network ("**CDMRN**") is an initiative aimed at fostering resilience within Canada's information ecosystem. It is funded through the DCI and coordinated by McGill University and the University of Toronto].
- [49] Ms. Awad said that the DCI receives monthly reports from CDMRN through PCO. The DCI uses the reports to inform its general policy work. CDMRN is an independent institution and has its own administration. The DCI is not responsible for monitoring the online information space as it relates to Canadian elections and does not have the capacity to do so. Ms. Awad indicated that such a role would not attach easily to PCH's mandate. Ms. Awad added that if PCH developed further capacity, that capacity would likely be better utilized if put toward further policy development rather than toward monitoring the domestic online information ecosystem.

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7. International Engagement

- [50] Ms. Awad added that PCH engages with the European Commission to discuss policy developments and best practices related to online harms, including disinformation, through periodic Canada-EU Digital Dialogues. PCH also engages bilaterally with the United Kingdom, the United States of America, Australia, New Zealand, and other countries from the G7 and G20. This engagement helps inform legislative work and the DCI's work.
- [51] Ms. Mondou added that PCH is actively seeking out conversations with other countries. For example, PCH actively participated in Brazil's side-event on "Information Integrity" as part of the country's G20 presidency. PCH also met with the Minister of Culture from Lithuania.

8. Other Initiatives to Create a More Resilient Citizenry

- [52] PCH is a part of an inter-departmental working group to update the Plan to Protect Democracy.
- [53] PCH is looking at what other steps can be taken. This includes reviewing other countries' Codes of Practice related to digital platforms' governance, including how they have fared, and if they have successfully increased transparency and reduced disinformation.
- [54] PCH is also examining whether the federal government possesses the required tools to remove monetary incentives associated with the spread of disinformation.
- [55] Ms. Awad explained that PCH is considering whether to pursue a national digital media literacy strategy, noting that such a strategy would require the collaboration and buy-in from provinces and territories. She underscored that educating the public about disinformation is a good way to build societal resilience, and referenced Finland and Taiwan as countries that have built a resilient ecosystem.
- [56] Ms. Awad does not have specific data on whether resilience in countries like Finland and Taiwan to MIDI from foreign state actors translates into a resilience to MIDI more generally or on whether teaching children about disinformation can have a trickle-up

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informational effect on their parents. However, some of the programs supported by the DCI also target other segments of the population.

[57] Ms. Mondou emphasized that Canada will be more vulnerable to disinformation if it does not support local news and reliable news media. She observed that Artificial Intelligence will likely complicate the online space. PCH has already started to consider how to address and respond to AI in the context of disinformation and digital literacy.