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

In Camera Examination Summary: Isabelle Mondou, Deputy Minister of Canadian Heritage[*]

Isabelle Mondou was examined by Commission Counsel during *in camera* hearings held in July and August 2024. Counsel for the Attorney General of Canada appeared on behalf of the Government of Canada and had the opportunity to examine the witness. The hearing was held in the absence of the public and other Participants. The summary discloses 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.

Note to Readers:

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

1. Examination by Commission Counsel

[1] Ms. Mondou confirmed the accuracy of her interview summary and adopted the document as part of her evidence before the Commission.

1.1 Witness

[2] Ms. Mondou began her career with the Government of Canada in 1994. She has since held a number of positions, including with the Canada Revenue Agency and with the Privy Council Office ("**PCO**"). In 2018, she left PCO after being appointed Associate Deputy Minister of Canadian Heritage. In 2020, Ian Shugart, the then Clerk of the Privy Council, asked her to assist PCO with and assume responsibility for managing communications regarding the COVID-19 pandemic. In May 2021, Ms. Mondou was

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[*] Translation.

appointed Deputy Minister of Canadian Heritage, a position she has now held for three years.

1.2 The Department of Canadian Heritage

[3]   The mandate of the Department of Canadian Heritage ("**PCH**" or the "**Department**") is to promote and strengthen Canadian identity. Over the years, the Department has developed programs with this mission in mind.

[4]   The Department fulfills a diverse mandate supporting culture, museums, official languages and Indigenous languages, multiculturalism, athletes and the sport system. Today, the promotion of multiculturalism has expanded and now includes combatting anti-racism and anti-hate. The adoption of the *Indigenous Languages Act* is a key step towards reconciliation with Indigenous peoples. This law seeks to ensure the preservation of Indigenous languages, which are currently endangered. The Department's sport branch includes the Olympic Games, as well as the pursuit and promotion of health and sport. PCH has developed tools to defend Canadian culture, identity and history, including the *Broadcasting Act*, the *Copyright Act* and the proposed Online Harms Bill. PCH also supports the survival of magazines and newspapers. In short, the Department aims to protect the ability of Canadians to share their stories and preserve their voices in a world of increased access to information.

[5]   The elements described above, through which the Department carries out its mandate, indirectly contribute to the resilience of Canadians against foreign interference. These elements foster a healthy ecosystem where news media is available, where people can obtain information from a variety of sources, and where people can have their voices heard through a broadcasting system as well as through artistic and non-artistic media. In metaphorical terms, these programs sit at the top of a funnel (or inverted pyramid), grouping together all of the Department's measures against foreign interference through reinforcing the Canadian identity and a sense of belonging. The Department's direct involvement in developing tools to build citizen resilience against disinformation began in 2018 with two key initiatives.

[6] Firstly, the Department participated in Minister of Democratic Institutions Karina Gould's plan to proactively develop a response to the phenomenon that emerged during the 2016 US elections. PCH was seen as a key contributor because of its involvement in the media and civil society ecosystems. Thus, in 2018, PCH developed a program [discussed in further detail below] to work with civil society to develop tools, research and instruments to help the public counter disinformation and possibly foreign interference.

[7] Secondly, the Department participated in drafting the proposed Online Harms Bill (Bill C-63). One aspect of this bill could indirectly address foreign interference, as it identifies a requirement for online platforms to reduce the risks associated with their services. The Act would also, among other things, introduce regulations to hold online platforms accountable for the content they host. These platforms would continue to self-regulate, but they would be subject to regulations requiring greater transparency and accountability.

1.3 Media and Digital: Two Interrelated Ecosystems

1.3.1 Disinformation

[8] In 2018, the phenomenon of disinformation was gaining momentum. Canada was observing what was happening in the United States and other parts of the world, but had little information on how disinformation was taking shape within its borders. While some people believed at the time that Canada was immune to disinformation, reality proved otherwise. Consequently, Canada sought more information about the phenomenon and how it manifested within the country.

[9] To this end, PCH launched a new program with three main areas of focus. The first was to facilitate research by funding projects aimed at addressing gaps in Canada's understanding of disinformation. Second, PCH had noted that, while there were researchers in this field, they worked in isolation from each other. The Department's aim was to facilitate an approach that would encourage the sharing of best practices and a more open discussion on the subject. Finally, PCH was aware of the fact that certain

groups or individuals do not always see the government as a reliable source of information on certain subjects. PCH therefore wanted to find a way to work with civil society. Despite having limited means, some civil society organizations were already quite active in certain areas. PCH set out to support the efforts already being made by civil society to develop new tools against disinformation and generate new insights into the phenomenon.

1.3.2 The Media Crisis

[10] Ms. Mondou mentioned that the comments from earlier in her testimony are part of a broader reflection on the Canadian media ecosystem.

[11] Over the past few years, PCH has observed a decline in the number of voices in the broadcasting sector, while online platforms have come to dominate in several areas. At the same time, the growing media crisis has also contributed to a decline in the number of voices in broadcast and print media. PCH noted that small-town newspapers were shutting down almost weekly, turning these communities into "news deserts" where people no longer had access to local information. As an example, Ms. Mondou explained that studies on this phenomenon have shown that people without access to information often pay higher taxes, as they are less able to make representations to their elected officials.

[12] Ms. Mondou noted that PCH has started investing in and has begun thinking about how to support the media, which are an important outlet for a diversity of voices. According to Ms. Mondou, media diversity helps counter foreign interference, as access to verified and credible information is one way to minimize its effects on the Canadian population.

[13] Ms. Mondou explained that, at that time, the Public Policy Forum produced a report discussing how to help the media. The idea was not for the government to become directly involved in the media industry, as this would compromise the fundamental principle of independent media. The report instead explored ways to support the media, ensuring its diverse voices continued to be heard as its business model shifted. To accomplish this, the Department implemented three substantive measures. Ms. Mondou

stressed, however, that no single measure can fully resolve the crisis, as newspapers are continuing to shut down and media organizations are struggling.

[14] The Department's first initiative, featured in the Public Policy Forum report, was to establish a program for local journalists (the "Local Journalism Initiative"), as local media organizations were the ones disappearing the fastest. PCH entrusted seven organizations representing different segments of the Canadian news industry with administering the Local Journalism Initiative. These organizations then provide funding to Canadian media organizations to improve local news access in underserved communities. The program has had a positive impact, having created 400 local journalist positions each year.

[15] The Department's second initiative was to develop legislation [the *Online News Act*] designed to restore a certain balance between traditional news businesses and online platforms. This imbalance lies in the fact that traditional news businesses produce articles but do not receive all the advertising revenue generated by these articles, as they are accessed via online platforms. Today, Google and Meta receive roughly 80% of online advertising revenue in Canada. The *Online News Act*, modelled on a similar law in Australia, aims to redistribute online advertising revenue more fairly and ensure that news businesses are compensated for their work.

[16] This legislation became the subject of a heated debate in Canada after an online platform [Meta] removed access to news content on one of its social media sites [Facebook]. The Canadian Radio-television and Telecommunications Commission ("**CRTC**") is currently assessing whether the agreement between Google and the consortium representing the media [contribution of $100 million annually, indexed to inflation, paid to Canadian news publishers] meets the legal and regulatory requirements. The law requires the platform to compensate not only major news organizations, but a range of news businesses including independent local news organizations, Indigenous news organizations, news organizations serving various racialized communities, and minority language community news organizations. Other online platforms may eventually reach the thresholds prescribed under the law and become subject to it and its regulations.

[17] The Department's third initiative was carried out in collaboration with the Department of Finance. Under this initiative, a portion of the salaries paid to journalists is paid through the tax credits available to news businesses. News organizations can also receive tax benefits by claiming charitable status, or benefit from tax credits for subscriptions to their news services.

[18] These measures were implemented to support print media. The Department has developed a number of tools to strengthen the diversity of voices in the ecosystem, which is important to the Canadian identity in countering misinformation and disinformation, and ultimately to protect democracy.

1.4 Digital Citizen Initiative

[19] In the year following the announcement of the Plan to Protect Canada's Democracy, PCH wanted to swiftly implement a program to counter disinformation. The Department therefore made use of its existing programs. In 2020, the Digital Citizen Initiative ("**DCI**") was officially established as an independent program and included the Digital Citizen Contribution Program ("**DCCP**").

[20] The first component of the DCCP was to fund research projects in areas where there were gaps to fill regarding disinformation. The second component of the DCCP was to fund projects that could help provide the public with tools to counter disinformation (e.g., fact-checking tools). The third component of the DCCP was to continue furthering the discussion on potential other measures that could be established relating to disinformation.

[21] The DCCP established priorities for each call for proposals. [The DCCP selects and funds research projects through a call for proposals]. Initially, priorities were broadly defined. According to Ms. Mondou, the program's aim was to develop tools to help citizens think critically and adopt the appropriate reflexes regarding this phenomenon. The Department was also seeking to fund research aimed at identifying ways of building citizen resilience to disinformation.

[22] Ms. Mondou noted that it was important for PCH to have two advisory committees to implement this initiative. These committees are the consultative body and the steering committee.

[23] Regarding the consultative body, PCH wanted to consult the overall public service to ensure the right priorities were established. The consultative body is therefore made up of members representing approximately 21 departments of the Government of Canada. These members include officials who work in national security and democratic reform. Members of the consultative body work together to prevent duplication of efforts and to ensure that the priorities of the DCCP's calls for proposals are complementary and well targeted.

[24] Regarding the steering committee, PCH wanted to connect with external experts involved in research in the field. According to Ms. Mondou, the contributions of these experts are valuable, as they can identify gaps in the area of disinformation and they maintain ties with civil society. The steering committee is made up of academics and civil society representatives. These experts have helped PCH to establish the priorities of the DCCP's calls for proposals and to identify gaps in disinformation research.

[25] On the research front, PCH has also developed a partnership with the Social Sciences and Humanities Research Council ("**SSHRC**"). As part of the DCI, the Department works in partnership with the SSHRC, promoting disinformation research through grants to researchers in Canada. The Department has also developed research partnerships with McGill University (Max Bell School of Public Policy) and the University of Toronto to track the evolution of the disinformation phenomenon.

[26] The Public Policy Forum has also received funding to create a Citizens' Assembly to further discussions on disinformation in Canada. Ms. Mondou has personally attended sessions of the Assembly, during which members of the public were invited to suggest potential actions and measures relating to disinformation.

[27] On an international level, the Department's activities are rooted in the issue of content diversity. PCH has worked with other countries, as well as with platforms, to develop

guiding principles on the subject of disinformation. Several countries, including Canada, some Scandinavian countries, France and Mexico, have taken part in this joint initiative. These principles are now available online and have been adopted by several countries.

1.5 Monitoring Online Disinformation

[28] Ms. Mondou explained that PCH does not necessarily have the capacity, or the mandate, to monitor online disinformation. She noted that it is the responsibility of departmental communications teams to monitor social media activity related to their respective mandates. For example, PCH monitors the digital information environment for projects and programs within its mandate.

[29] Some departments, by virtue of their mandate, are more active in monitoring the digital environment. This is the case for Global Affairs Canada on the international level, and for the Department of National Defence.

1.6 The DCCP and its Various Calls for Proposals

[30] One of the priorities of the DCCP's most recent call for proposals deals specifically with disinformation from foreign governments, such as the People's Republic of China, targeting diaspora communities.[1] According to Ms. Mondou, this is a concrete example of the more direct involvement of PCH in countering foreign interference. To establish this priority, the Department consulted members of the security agencies and Global Affairs Canada.

[31] This example illustrates how other departments [members of the consultative body] contribute to establishing priorities and selecting projects for the DCCP. These partners provide more specific information and participate in reviewing the DCCP's priorities. Following the Evaluation of the Digital Citizen Initiative 2018-19 to 2020-21 ("**Evaluation of the DCI**"),[2] changes were made to the governance of the DCI. Applications will no longer be reviewed by all partners on the consultative body. PCH will focus on partners

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[1] CAN044734, priorité no 7.
[2] COM0000532.

who have the most added value in a particular case. The members of this committee have widely varying security clearance levels, as they come from a range of government departments. The information shared among members is therefore general in nature, and the committee is not a forum for the exchange of sensitive information.

[32] Once PCH completes its consultations with the two advisory committees, a memo is drafted to the attention of the Minister of Canadian Heritage recommending the priorities to be approved for the DCCP's next call for proposals. Ms. Mondou noted that the priorities established in a call for proposals do not exist in vacuums, and that they can have an impact on each other and be interrelated. For example, one of the priorities in the most recent call for proposals involves developing tools to help the public identify false or misleading content generated or amplified by "bots" or artificial intelligence ("**AI**").

[33] On this topic, Ms. Mondou noted that PCH is becoming increasingly concerned about the rapid acceleration of recent technological changes in AI. AI is obviously an excellent tool that can contribute to positive initiatives, but it is also a means for generating disinformation. For example, AI can now spread content online without any human intervention (via "bots"). It is therefore important for the Department to gain a better understanding of this phenomenon and its impacts, and to develop tools to address it. Ms. Mondou believes AI will become a recurring theme in the priorities of PCH (and therefore of the DCCP), given the potential impact of this technology.

[34] Ms. Mondou noted that PCH-funded projects alone will not solve the disinformation problem. They can, however, help civil society develop tools to better equip Canadians to deal with the phenomenon. Some of these projects aim to develop "horizontal" tools that will benefit the entire population, while other more "vertical" tools focus on specific communities in Canada that may be more vulnerable to disinformation.

[35] Ms. Mondou noted that provincial and territorial governments are also involved in efforts to counter disinformation, particularly in the area of education. Ms. Mondou explained that she had recently attended a meeting in Halifax to discuss the province's efforts to counter disinformation. As part of its mandate, PCH is also involved in educating the

public through various programs. For example, the Department works in partnership with CIVIX, an organization that works with schools to provide teachers with better tools to further discussions on the subject. PCH also supports projects to for parents at home. The Department is developing a program for seniors, who are also vulnerable to online disinformation.

1.7 The DCCP's Most Recent Call for Proposals

[36] Priority Seven of the DCCP's most recent call for proposals follows a recommendation by a committee of the House of Commons that examined the issue of foreign interference more broadly. The recommendation is repeated almost verbatim in the call for proposals: "Take measures to counter the prevalence of People's Republic of China-influenced media in Canadian diaspora communities." The DCCP has agreed to fund a project by the University of Calgary to study Chinese media in Canada. The project leaders will make recommendations for countering the disinformation spread through these media sources. Specifically, the project will analyze this media content, including the feelings and emotions they evoke, to assess whether they indeed participate in foreign interference. The ultimate goal of the project is to determine how this phenomenon impacts Canadian diaspora communities.

1.8 Knowledge Dissemination

[37] Most DCCP-funded projects last one year, with some extending over several years. The DCCP's steering committee and the interdepartmental working group on research at PCO's Protecting Democracy Unit are two of the forums used to disseminate information generated by PCH-funded research projects. The information gathered is also published on the Department's website. Ms. Mondou explained that discussions are ongoing regarding ways to ensure that information is widely disseminated, including to Canadian provinces.

[38] Similarly, prior to the COVID-19 pandemic, PCH organized conferences to which DCCP partners were invited and where research findings were presented. At present,

information is more widely disseminated at the monthly PCO working group meetings, mainly due to the working group's coordination function within the government. This approach is relatively new, and the Department is continuing to assess the effectiveness of these monthly discussions.

[39]   Since 2018, PCH has been a committed partner of national security agencies and the PCO Democratic Institutions Secretariat. While this involvement has not always been in the form of a working group, PCH works closely with national security agencies and democratic institutions on matters related to its mandate.

[40]   Ms. Mondou also noted that PCH wishes to make its website more accessible to the general public. One of the Department's specific objectives is for civil society to be able to draw on the information available to then develop (or continue to build) best practices. PCH will continue to consider other tools for disseminating relevant information about the various projects funded through its programs.

1.9 Measuring the Success of the DCCP

[41]   Ms. Mondou was asked to comment on how the success of the DCCP is measured. According to Ms. Mondou, the success of the program is measured on three levels. First, the projects themselves are reviewed individually. Project leaders must include concrete measures in their demands to assess their success and must report these outcomes to the DCCP's executives.

[42]   Second, PCH is interested in whether, in the context of the program, the right priorities were identified. Ms. Mondou explained that PCH assessed the effectiveness of the DCCP as a whole. According to the Evaluation of the DCI, the effectiveness indicators might need to be reworked. The Evaluation also revealed areas for improvement in the DCCP's governance. On the one hand, the membership of the consultative body has been reformed—prior to its reform, this committee was made up of 21 departments represented by approximately 46 people with varying levels of interest or expertise in assessing the projects. Ms. Mondou explained that the role of this body will be to establish the right priorities, share information and ensure the program's relevance

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according to needs. Applications will therefore be reviewed by a smaller group of stakeholders. On the other hand, the Department is implementing the recommendations made in the Evaluation of the DCI with regard to the steering committee. Many of the members of this committee have expertise that was relevant in the early phases of the program when priorities were broader in scope. The DCCP now issues more specific calls, for example regarding foreign interference. Experts on the steering committee must therefore possess a wider range of expertise to fulfill their mandate. Ms. Mondou concluded by noting that her department is in the process of implementing all of the recommendations made in the Evaluation of the DCI.

1.10 Future of the DCCP

[43] Ms. Mondou said that the DCCP makes a tangible contribution to countering disinformation and that the Department will certainly be seeking renewal of the program. The program's funding is currently set to expire in March 2025. Ms. Mondou noted that PCH would like to see the DCCP become a permanent program and to see increased funding for the program, for which the annual budget ranges from $7 million to $10 million, depending on the year.

[44] Ms. Mondou believes it is important to continue the work of this program, as tools to help build citizen resilience against disinformation have proven successful in other parts of the world—Ms. Mondou cited Finland and Taiwan as examples. These tools are designed to counter all forms of disinformation, including foreign interference. Ms. Mondou believes the DCCP should continue to expand, working with other partners such as provincial and territorial governments.

1.11 The Deputy Minister and Classified Information

[45] Ms. Mondou is a full member of the Deputy Minister Committee on China, chaired by her colleague from Global Affairs Canada. Ms. Mondou participates regularly in this committee.

[46] Occasionally, Ms. Mondou is invited to committees chaired by the National Security and Intelligence Advisor to the Prime Minister ("**NSIA**"). Ms. Mondou has been invited to these committees when discussions have dealt specifically with the subject of disinformation, given the role of PCH on this issue. Ms. Mondou has Top Secret security clearance and participates fully in committee discussions that involve sensitive intelligence. According to Ms. Mondou, these discussions sometimes involve specific information. She believes that discussions regarding overall priorities do not require this level of detail. However, these discussions on intelligence are useful, as they allow her to assess whether the existing tools are sufficient and whether they adequately address Canada's challenges. Ms. Mondou believes it is important for PCH to be involved in these discussions, as it provides a complementary perspective to that of the national security agencies.

[47] Regarding access to intelligence, Ms. Mondou said she had never experienced a situation in which she needed to receive specific intelligence to carry out her duties effectively.

[48] The existence of the DCI and DCCP is well known within the government. Since 2018, various government actors have increasingly collaborated with PCH.

1.12 PCH and Diaspora Communities

[49] Ms. Mondou noted that PCH has several contact points in various communities across Canada. As an example, Ms. Mondou explained that, for the past few months, she has been co-chairing a table on healthy communities, alongside the Deputy Minister of Public Safety. These discussions emphasize the importance of not only security agencies, but also of collaborating with communities to tackle issues such as disinformation. As such, the Department is sometimes called to provide input with its contacts with communities through its various programs. Through the DCCP, PCH occasionally funds programs aimed at specific communities. Racialized communities, for example, are often more affected by hate and disinformation.

1.13 The Role of the CRTC

[50] Ms. Mondou noted that the CRTC is an administrative tribunal whose mandate includes implementing the *Broadcasting Act*, while the Minister of Canadian Heritage is responsible for broadcasting policy.

[51] With the renewed *Broadcasting Act*, online platforms must contribute financially to the Canadian system. Funds will be redistributed to finance various projects, such as films and television programs, and to support media organizations, including those in different languages. The goal of the renewed Act is to strengthen Canadian voices and provide access to a diversity of content.

[52] Ms. Mondou also explained that the CRTC is responsible for issuing broadcasting licences to Canadian channels. Online platforms, on the other hand, are not licenced. The CRTC is also responsible for creating the list of non-Canadian programming services and stations authorized for distribution in Canada. Ms. Mondou noted that the CRTC was trying to adopt a permissive approach to ensure the representation of a diversity of voices.

[53] At the start of the war in Ukraine, the CRTC removed two Russian stations (RT [Russia Today] and RT France), which were broadcasting propaganda against Ukraine, from the list of non-Canadian programming services and stations authorized for distribution in Canada. The Governor in Council invoked section 15 of the *Broadcasting Act* and requested that the CRTC investigate the matter. Ms. Mondou noted that the CRTC's role is independent as it is an administrative tribunal. The CRTC found that the programming on these two stations was not consistent with the objectives of the *Broadcasting Act* and, as a result, prohibited Canadian cable companies from broadcasting content from these stations.

[54] Ms. Mondou said she is aware that, following complaints, the CRTC is examining the activities of two Chinese broadcasting stations. These stations are currently on the list of non-Canadian programming services and stations authorized for distribution. Ms. Mondou had no information on what the CRTC's decision would be, as the CRTC is an

independent organization. Citing a recent complaint received by the CRTC regarding Fox News, Ms. Mondou noted that these are delicate issues, as the line between information, misinformation and disinformation can sometimes be difficult to delineate. The CRTC announced that it will be updating its regulatory framework, which dates back to 2008, which will provide the public the opportunity to make representations on this matter.

1.14 Proposed Bill to address Online Harms

[55] , PCH has been working on the proposed bill to address Online Harms for the last three years. The bill calls on online platforms to improve their self-regulation processes and ensure the safety of their products. A new regulatory body would be created to oversee the self-regulation of platforms, and this body would have access to the information required from platforms, and have auditing and sanctioning authority. Platforms would be required to provide this regulatory body with their plan for mitigating harm caused by their activities, including how they intend to achieve these objectives. The bill would place the onus on the companies and foster a level of transparency that does not currently exist. At present, civil society and academics are unable to assess the measures taken by platforms to minimize the harm caused by their activities.

[56] The bill aims to counter harmful online content, identifying seven types of harmful content for which platforms are being asked to "do more" to mitigate risks to users, focusing on the spread of online hate via social media. Disinformation is not one of the seven types of content identified in the Bill. However, by regulating these harms, which include incitement to violence and terrorism, the bill engages disinformation. For example, if automated software programs (i.e., "bots") are used to incite violence, or any other harm covered by the Bill, the platform will need to flag this information to ensure users are aware they are dealing with an AI tool rather than human-generated content.

[57] The new regulatory body will also have the authority to enforce the law by imposing fines against online platforms in Canada.

[58] Online platforms do not appreciate when governments force measures upon them that, in their opinion, are in conflict with their business model. For example, they were not pleased with the fact that the *Online News Act* forced them to publicly disclose their agreements with news organizations. In Canada, this transparency was important to preserve the independence of the media.

[59] The Department continues to engage in international discussions to promote the adoption of common positions on these issues.