



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

## Public Consultation Process: Themes Discussed in Written Submissions and Questionnaire

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## Executive Summary of Report

Pursuant to Rules 11 and 39 of the Commission's *Rules of Practice and Procedure*, the following document summarizes the themes raised and discussed in the written submissions members of the public provided to the Commission and in responses to the Commission's online questionnaire.

## Notes to Reader

The Commissioner has not and will not be making any findings:

- about the accuracy of the information described in this Summary Report; or
- about the accuracy of the information received via written submissions or responses to the Commission's online questionnaire from members of the public.

It should also be noted that the information was not provided under oath or solemn promise to tell the truth, nor was it subject to cross-examination, and as such, does not constitute evidence.

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## 1. Importance of Public Participation

- [1] It was important for the Commission to hear from members of the Canadian public on the issue of foreign interference, including about:
- a. Whether they believe foreign interference is a pressing concern;
  - b. Their experiences with foreign interference and Canada's responses to it;
  - c. Their views on the government's efforts to detect, deter, and counter foreign interference;
  - d. Their ideas about how to better respond to foreign interference; and,
  - e. Their level of confidence in the integrity of our electoral processes and democratic institutions in the face of the ever-evolving threat of foreign interference.
- [2] Members of the Canadian public provided the Commission with information on the above-noted questions and other topics related to foreign interference by engaging with the Commission's public consultation process. More specifically, people and groups shared their experiences, views, and ideas with the Commission through written submissions and by responding to the Commission's online questionnaire. In total, the Commission received over 200 written submissions from individuals and groups, and 624 responses to its questionnaire. Detailed information about the written submission process and the questionnaire can be found on the Public Consultation Page of the Commission's website.
- [3] The Commission is grateful to all members of the Canadian public who shared their ideas and experiences on foreign interference.

## 2. Themes

- [4] The Commission reviewed and categorized aspects of the information received through the written submissions and answers to the questionnaire. A discussion of the key themes raised in this information is set out below.



- [5] In preparing this Summary Report, the Commission did not focus only on information relevant to its mandate. Instead, this Summary Report provides an overview of all information received, without any editing based on relevance or otherwise.
- [6] Please note that this document is not an exhaustive account of all the information received but is published to share with the public the content of the information the Commission has received.

### Questioning the existence and extent of foreign interference

- [7] Amongst the submissions received by the Commission, some questioned the existence and extent of foreign interference in Canada. Writers expressed that they had never encountered or witnessed foreign interference, despite being in positions or situations that would appear ripe for such interference.
- [8] The Commission heard concerns about the accuracy of the information the Commission was receiving regarding the intent, motivations, and strategies employed by the Chinese Communist Party (the “**CCP**”) as they pertain to members of relevant diaspora communities, and to Canada and its politics and electoral processes more generally.
- [9] The Commission was cautioned against believing those who claim to have lost elections due to foreign interference without appropriate evidence.
- [10] The Commission received submissions asserting that different foreign states are treated differently when it comes to their engagement in Canada’s affairs. People expressed the view that Canada’s efforts to detect, deter, and counter foreign interference should not be curtailed by focusing on only one or a few foreign states; Canada should investigate whether states generally seen as Canada’s allies are perpetrating foreign interference into Canada’s democratic processes and institutions, and against members of the Canadian public more generally.
- [11] The Commission heard in particular that the United States is treated differently than other states that have acted in Canada. One written submission asserted that the United States is the biggest foreign interference threat to Canada. Another questioned whether there will soon be an Inquiry into Israeli and American government interference, stating that there should be if all Canadians and communities are to be treated equally.



A questionnaire response expressed doubt over whether the federal government would be able to reduce the influence of the American government in light of the longstanding influence that it has had on Canadian affairs.

- [12] The Commission also received a warning against trusting the Canadian Security Intelligence Service (“**CSIS**”) and heard that foreign interference had led to the loss of faith in CSIS and other parts of the Canadian federal government.

## Detecting Foreign Interference

### Conceptual definitions

- [13] People told the Commission that certain terms commonly used in discussions of foreign interference should be defined, or their definitions should be refined. More specifically, the Commission was told that the term “foreign interference” should be clearly defined, and that the definition should incorporate a requirement of clear and convincing evidence to draw conclusions about the existence of foreign interference. Another submission highlighted the value of recognizing a diversity of opinions when defining what constitutes Canada’s national interests.
- [14] There were suggestions that the concept of transnational repression requires a definition accepted and consistently used by the government of Canada and its international partners and allies. Further, such a definition should be premised on (1) the intent or aim(s) of the tactics used, and (2) the identity of the perpetrators of transnational repression.

### Whole-of-government approach

- [15] The Commission received submissions and questionnaire responses advocating for a whole-of-government approach to detecting, deterring, and countering foreign interference. Submissions called for the co-ordination of law enforcement, judicial, and diplomatic resources in Canada’s approach to foreign interference. Other submissions highlighted the need to identify and address jurisdictional issues among Canada’s levels of government and law enforcement agencies. It was suggested that there should be annual public hearings and reporting on foreign interference to avoid compromising



fundamental Canadian values in Canada's efforts to detect, deter, and counter foreign interference.

#### United States precedent

- [16] An individual mentioned that the People's Republic of China ("**PRC**") does not interfere with elections in the United States and suggested that Canada could learn from that example.

#### Use available powers to investigate and combat foreign interference

- [17] The Commission received suggestions that relevant entities and organizations in Canada should use powers already available to them to better combat foreign interference and its impacts on members of the Canadian public. There were specific calls for the investigation and prosecution of those who threaten the safety of diaspora community members. The Commission also received a written submission questioning why there have been no prosecutions for foreign interference by the Royal Canadian Mounted Police ("**RCMP**") or the Office of the Commissioner of Canada Elections ("**OCCE**").
- [18] It was suggested that the telecommunications industry in Canada should use lawful interception to "collect and furnish law enforcement with intercepted communications from private individuals or organizations, ensuring legal compliance and enhancing security measures."

#### Education of government officials

- [19] Canadian government officials should be educated about foreign interference and the tactics used to perpetrate it so they are better equipped to identify foreign interference tactics they may encounter in the course of their work.

#### Calls for investigation into government officials and public servants

- [20] Canada should investigate elected and appointed government officials and public servants who may be passively or actively engaged in foreign interference.



### Calls for investigation into organizations acting contrary to Canadian values

- [21] It was suggested that Canada should investigate organizations that “either directly or indirectly, support, excuse, gloss over, and whitewash foreign governments who are human rights violators.” The Commission also received suggestions that Canada should systematically track and map transnational repression activities within the country to better understand patterns, methods, and strategies required to counter such activities. Another writer suggested that Canada identify local entities and individuals with close ties to the Chinese consulate, the CCP, and affiliated organizations, including businesses vulnerable to manipulation by the CCP.

### Calls for investigation into attacks on Falun Gong practitioners

- [22] The Commission received submissions calling for the investigation of those who attack Falun Gong and its practitioners in Canada, including individuals and organizations acting as proxies for the CCP. Submissions asked Canada to take proactive measures against those who seek to attack or undermine the practice of Falun Gong in Canada.

### Engaging with members of the Canadian public

#### Understanding diaspora community composition and complexities

- [23] A number of submissions expressed the need to recognize that diaspora communities are not homogenous and that Canada's approach to foreign interference will fail without an appropriate response to the diversity of people, histories, relationship, beliefs, views, and opinions existing within each diaspora community.
- [24] People asserted that Canada's approach to detecting, deterring, and countering foreign interference from the PRC must be grounded in a deep understanding of China and the various factors and forces at play for Chinese Canadians, including legitimate personal and business interests in China.

#### Language competence

- [25] The Commission heard about alleged misinterpretations and mistranslations of communications in languages other than Canada's official languages leading to a misunderstanding of the meaning and intent of the original message that may have dire



and permanent consequences when such misunderstandings are linked to allegations or investigations of potential foreign interference.

#### Education and training of national security and law enforcement personnel

- [26] Submissions stressed the need for ensuring that the individuals who engage with members of the Canadian public about instances of foreign interference have the necessary education, knowledge, and skills, including foreign language skills, to fulfill their responsibilities effectively.

#### Increased transparency of Canada's efforts to detect, deter, and counter foreign interference

- [27] The Commission received a number of submissions seeking enhanced transparency of Canada's efforts to detect, deter, and counter foreign interference. Dismay was expressed that the public had to rely on security intelligence leaks to get information about Canada's fight against foreign interference. Regular public reporting on foreign interference threats and what is being done to address them was highlighted as a means to build trust and cooperation with communities vulnerable to such threats.

#### Public condemnation of foreign interference and those perpetrating it

- [28] Other submissions asked for public condemnation of foreign interference and transnational repression and their perpetrators. In particular, the Commission received submissions calling for the public condemnation of the persecution of Falun Gong and its practitioners.

#### Public education about foreign interference

- [29] The Commission heard suggestions that providing public education about foreign interference and the threats it poses to our democracy is an important component in Canada's efforts to detect, deter, and counter foreign interference. It was stated that more information is required about the methods used to perpetrate foreign interference, including threats made to activists and their families, to better help the Canadian public understand the severity and impacts on our democracy. Similarly, it was suggested that cultural institutions vulnerable to foreign interference and transnational repression would



benefit from a civil-society-led initiative to strengthen awareness about and prevention of foreign interference.

- [30] The Commission received a suggestion that, as part of election processes, or on election cards, available resources should be clearly listed for use by those who observe or are victims of election interference or undue influence from foreign entities or governments.
- [31] It was suggested that education be provided to newcomers to Canada about how to address their fears about the potential actions of foreign governments against them in Canada. The Commission received specific suggestions about the importance of raising awareness about the network of proxies acting on behalf of the PRC to build resilience against those forces.
- [32] Strengthening alternative media and related platforms was highlighted as a means to foster democratic processes and encourage both direct and digital democracy, including via participatory consultations.

#### Public education about how to protect against foreign interference

- [33] To better enable members of the Canadian public to protect themselves against foreign interference, people suggested education about the risks of foreign interference and how it may be perpetrated is required, and that guidelines explaining how to identify potential risks and how to navigate those risks would be very useful. Education is also required regarding the issue of individuals and organizations collecting information on members of the Canadian public on behalf of foreign states, and that the Canadian government should take action against such behaviour.
- [34] It was suggested that strong cybersecurity practices, including the use of secure communication platforms and best practices in digital security, be taught and promoted, particularly to members of vulnerable communities.

#### Secure options for reporting foreign interference

- [35] A number of submissions advocated for the creation and publicization of secure channels that members of the Canadian public could use to report instances of foreign interference and those suspected of perpetrating it. People stressed that the reporting



options must be easy for members of the public to use and include different options for reporting, such as by phone, in person, and online. Questionnaire responses suggested that members of the public making such reports should receive a response in a timely manner and that entities tasked with investigating such reports be properly resourced to conduct thorough investigations.

- [36] It was suggested that a confidential task force be established to receive reports of foreign interference and provide support, including advice on how to navigate foreign interference issues.
- [37] The importance of implementing outreach mechanisms to improve contact and trust between likely foreign interference targets and the Canadian agencies tasked with protecting against such interference was stressed. Similarly, the Commission was told that those vulnerable to foreign interference should be encouraged to report threats to the appropriate Canadian authorities, as such reporting will help to build a stronger support network and identify those at risk who may need protection.
- [38] The Commission received calls for more detailed warnings from Canada's national security agencies and other relevant organizations to private individuals in Canada who are at risk, with specific reference made to members of the Sikh diaspora subject to foreign threats.
- [39] It was suggested that stronger legal protections, specialized protection services, and resources should be offered to those who are particularly under threat due to their political activities or dissident status, including financial support for security improvements at their homes and places of work. It was suggested that it would be useful to follow the approach of the United States Federal Bureau of Investigations in this regard.

#### [Involving the public in Canada's fight against foreign interference](#)

- [40] The Commission received a number of suggestions stressing the importance of working with members of the Canadian public in Canada's efforts to detect, deter, and counter foreign interference but that care must be taken in protecting Canada's national security interests to ensure that such measures do not unintentionally foster fear or



discrimination. A careful and inclusive approach was encouraged. People suggested convening community town hall meetings to discuss foreign interference and possible responses and stressed the importance of building relationships with trusted members of diaspora communities in Canada to increase awareness and lay the groundwork for faster responses to foreign interference issues.

- [41] A community-led rapid response team prepared to promptly respond to instances of foreign interference, provide support to foreign interference targets, co-ordinate with relevant government authorities, and serve as a bridge between the community and stakeholders such as the media was also suggested.

#### [Educated, informed, and dedicated resources focusing on specific threat actors](#)

- [42] The Commission received submissions discussing the importance of ensuring those who interact with the victims of foreign interference are thoroughly educated about how to recognize foreign interference and transnational repression. People warned about the dangers of policing approaches based on racial profiling, assuming that entire communities may be implicated based on ethnicity, and the use of intimidation as an investigatory tactic.
- [43] Submissions on this theme specifically addressed the need for individuals who understand the intricacies and sensitivities of specific communities that may be targeted, particularly Chinese, Eritrean, Hindi, Iranians, Russians, and Urdu people living in Canada.
- [44] It was suggested that agents from Canada Border Service Agency be educated about former Iranian regime individuals involved in human rights abuses who attempt to come to Canada.

#### [Exercising rights to assemble and protest](#)

- [45] The Commission received a submission suggesting that local police forces should acknowledge their responsibility to protect all members of the Canadian public exercising their right to assemble and protest. People highlighted the importance of understanding the risk to protesters when law enforcement agents require them to self-identify in the vicinity of the surveillance cameras of the Chinese consulate.



### Pace of investigations and responsive action

- [46] The Commission received submissions suggesting that increased resources are required to investigate foreign interference by China. Others expressed hope for the speedy conclusion of the RCMP's investigation into allegations of Chinese overseas police stations in Canada.

### Follow the money

- [47] It was suggested that Canadian police forces should work with banks to investigate suspicious funds and money transfers.

## Resources and Supports for Targeted Individuals and Communities

### Protect exercise of democratic rights and freedoms

- [48] The Commission received a number of general calls for increased protection of activists, dissidents, and members of diaspora communities vulnerable to foreign interference and transnational repression. In particular, Canada must vigilantly protect the right to free speech, ensuring that individuals can speak out against foreign regimes without fear of retribution.

### Diaspora-focused office and policy

- [49] Someone suggested that Canada create an arms-length federally funded diaspora office and adopt an official diaspora policy.

### Expand scope and improve accessibility of information about foreign interference and how to respond

- [50] Another suggestion was that Public Safety Canada should expand the information available on its website about foreign interference, and that such information should be accessible in multiple languages, in addition to Canada's two official languages.

### Academia

- [51] It was suggested that a governmental agency should be formed and tasked with periodically reviewing international academic collaborations and advising universities



and other relevant institutions on current and anticipated foreign interference and transnational repression risks they may face.

- [52] The Commission received a suggestion that safe spaces be provided for Chinese students by funding independent student organizations to counter the influence wielded by other organizations that may aligned with the CCP.

#### [Funding for programs promoting Canadian values](#)

- [53] Funding cultural, educational, and social programs promoting Canadian values was raised as a meaningful way to build resilience to foreign interference within communities in Canada likely to be targeted by hostile foreign actors.

#### [Funding for Canadian-aligned community organizations](#)

- [54] It was suggested that funding be provided to Chinese-language community services to provide alternatives to CCP-aligned community service organizations.

#### [Funding and services for victims of foreign interference](#)

- [55] The Commission received submissions suggesting that victims of foreign interference and transnational repression be provided with resources and supports, including physical and psychological support.

### [Immigration](#)

- [56] Several submissions and questionnaire responses addressed concerns about the misuse of Canada's immigration and refugee system, and the potential risks posed by organizations purporting to support new immigrants and refugees. It was suggested by one that a dedicated body be implemented to oversee Immigration, Refugees and Citizenship Canada.

#### [Increased oversight of organizations purporting to support immigrants and refugees](#)

- [57] The Commission heard concerns about the misuse of Canada's refugee system to bring individuals who support hostile regimes, while purporting to be fleeing such regimes, to Canada – certain submissions on this topic specifically identified individuals coming to Canada from Eritrea. It was suggested that Canada should examine and verify



organizations that hold themselves out as sponsoring and/or supporting immigrants. It was suggested that Canada should verify that such organizations do not have ties to hostile foreign regimes, with another submission along these lines explicitly identifying the PRC.

#### Enhanced screening of immigrants and refugee claimants

[58] The Commission received suggestions that more careful scrutiny is required of those seeking to immigrate to Canada, including submissions specifically addressing those seeking refugee status where claimants have known ties to hostile foreign actors, particularly where they have engaged in the spread of hostile foreign state propaganda or to incite violence within the community.

[59] It was suggested that Iranians seeking to obtain permanent resident status or immigrate to Canada should be screened with the assistance of trusted Iranian professionals who have a good understanding of the inner workings of the Iranian regime.

#### Support immigration for foreign activists and dissidents

[60] The Commission received a submission calling for the creation of immigration pathways for immigrants from Hong Kong, Taiwan, Tibet, and Xinjiang, and for the expansion of humanitarian and family reunification pathways, suggesting that the creation of these pathways are both consistent with Canadian values and that they would provide Canada with firsthand information about PRC foreign interference. The Commission also received suggestions about supporting and enhancing immigration and refugee pathways.

#### Denial of entry and deportation of known threat actors

[61] The Commission received suggestions that a whole-of-government approach to enforcing Canada's immigration legislation is required to effectively respond to foreign interference operations in Canada. It was suggested that those who engage in immigration misrepresentation be prosecuted, those who incite or spread hate should be denied entry to Canada or deported, that individuals in Canada with ties to hostile regimes be expelled, and that entry visas to Canada be denied for those who intend to spread the propaganda of foreign regimes.



## Legislation

### Bill C-70 and the regulation of foreign agents in Canada

- [62] The Commission received a number of submissions addressing Bill C-70. Some called for the speedy implementation and strict enforcement of Bill C-70; others opposed it. Reasons for such opposition included concerns that the phrase “in association with a foreign entity” is too loose. The drafting of regulations was seen as an opportunity to provide more specificity. The Commission heard a concern about who will determine what activities are not “in the Canadian interest”, noting that leaving this determination solely to Canada’s security forces has caused issues in the past. A submission raised the issue that Bill C-70 doesn’t include political party nomination contests and leadership elections.
- [63] It was suggested that the administrative monetary penalties included in Bill C-70 could undermine the legislation’s effectiveness in combatting foreign interference, and that an “enhanced tier” such as that included in the equivalent United Kingdom legislation should be considered.
- [64] Written submissions expressed concern over the contents and application of Bill C-70. With respect to the Bill itself, the Commission heard the concern that ambiguities within the Bill would be interpreted to require “excessive registration” and lead to unwarranted suspicion.
- [65] The Commission received a submission stating that the foreign agent registry provisions should not hinder Canadian research opportunities, and that active engagement was required to protect such opportunities.
- [66] Some submissions addressed the lobbying of the Canadian government by foreign actors more generally. One submission suggested that lobbying by non-state foreign actors should be limited. Another suggested that federal organizations and individuals working for them be prohibited from engaging with foreign entities without full transparency and accountability.
- [67] It was suggested that Canadian organizations should be required to publicly disclose any foreign sources of funding they receive. Another suggestion was that PRC state



media organizations be designated as foreign missions and required to register as a foreign agent.

#### [Introduce or increase strong laws against foreign interference in Canada](#)

- [68] The Commission received submissions suggesting that laws should be introduced to protect members of the Canadian public from foreign interference and transnational repression. Specific suggestions on this topic included that legislation be introduced allowing Canadian law enforcement agencies to seize assets tied to foreign governments with the intent to harm or threaten Canadians; removing eligibility for government awards and funding for those implicated in foreign interference; and banning technology complicit in transnational repression and genocide.
- [69] As regards social media platforms, suggestions included that Canada follow the example set by the United States regarding TikTok, and that social media companies operating in Canada be required to be owned and operated by Canadian companies to enable effective regulation in accordance with Canadian law.
- [70] A submission addressed electronic data protection more generally, suggesting that companies operating within Canada be required to store and process data locally and pointing to Europe's General Data Protection Regulation as a useful example.

#### [Independent agency protecting Canadians against foreign interference](#)

- [71] The Commission received suggestions that an independent agency or task force, dedicated to protecting Canadians from foreign interference, be established. Such an agency could be tasked with, among other things, receiving and responding to reports of foreign interference from members of the Canadian public, tracking suspicious sources of funding, and educating other government agencies and law enforcement on foreign interference.

#### [Transparency and disbursement of public funds](#)

- [72] Submissions called for stricter rules applicable to entities and organizations that receive Canadian government funding and those who apply for charitable status. Suggestions related to this topic included that stricter rules should be implemented for those who receive such funding, and that regular audits be conducted to ensure respect of these



rules. It was also suggested that entities and organizations seeking Canadian public funding be required to disclose the sources of any foreign funding they receive, and that the Canada Revenue Agency (“**CRA**”) should be tasked with investigating those who fail to report foreign funding in their applications.

- [73] The Commission received a submission specific to academic and research grants and funding, including that “value-driven” collaborations be incentivized, and that taxes on research grants prioritize “risk-free” businesses or institutions. It was also suggested that funding provided by adversarial actors be replaced and bettered by Canadian funding to reduce dependency on foreign funds.
- [74] One submission put forward the idea that organizations receiving funding from the PRC should not be eligible to receive public funding in Canada, that media outlets receiving foreign funding should be required to register with the foreign agent registry and that the CRA should enforce the provision preventing taxpayers from claiming a deduction for advertising expenses where the advertisements are placed in foreign-owned outlets.

#### Changes to the *Multiculturalism Act*

- [75] It was suggested that the *Multiculturalism Act* be amended to ensure the non-partisan independence of community organizations.

#### Sanctions

- [76] The Commission received suggestions in support of the expansion and imposition of sanctions on those perpetrating foreign interference and transnational repression, with specific references made to malign actors working on behalf of the CCP to target Uyghurs and working on behalf of the CCP more generally, Eritrea, and Russia. Someone suggested that Canada should align itself with allied nations in imposing sanctions against individuals that have been identified as CCP spies.



## Political Party Processes

### Enhanced oversight of political party processes

- [77] The Commission received suggestions about implementing oversight of political party processes to better protect against foreign interference threats.

### Nomination and Leadership Contests

- [78] The Commission heard concerns that political party nomination processes are “gateways” for potential foreign interference, and received calls for the involvement of Elections Canada in political party processes out of concerns about gaps and related risks in those processes.
- [79] People expressed the view that permanent residents, temporary residents, and foreign students should not be permitted to vote in political party nomination contests. It was suggested that prohibiting foreign students from voting in political party nomination contests would provide an element of protection for those students against foreign interference as they would no longer be useful targets for states seeking to meddle in the nomination voting process.
- [80] One person suggested that the background checks run on potential political party nomination candidates should be strengthened and that candidates should be specifically screened for affiliations with the government of the Republic of India.
- [81] The Commission heard from individuals asserting that international students were not bussed in to cast votes for Han Dong in the 2019 nomination contest. Certain of these submissions asserted that such conclusions were based on a misunderstanding of political nomination contests, while others claimed that there was insufficient public evidence of the allegations. An individual, while stating they did not have direct knowledge of the alleged facts, argued that Han Dong would be an unlikely target for foreign interference because he entered the race with no volunteers or money.



## Funding

- [82] Individuals noted that they have observed foreign interference in a Canadian federal election or in Canadian democratic processes in the form of attempts to use foreign funds to support election activities or influence a person's vote, choices, or actions.

## Resources

- [83] An individual expressed concern about the lack of dedicated resources within political parties to identify and address foreign interference.
- [84] It was suggested that a per-vote subsidy to political parties be instated to provide political parties with the funds required to screen potential candidates for foreign interference risks.

## Information Practices

- [85] The Commission heard that there is a “concerning gap” when it comes to privacy protections in Canadian laws, particularly the absence of minimum standards governing the collection, use, and sharing of personal information by Canada’s political parties, and a lack of non-partisan oversight of their privacy practices.

## Electoral, democratic, and diplomatic processes

### Election oversight

- [86] The Commission received a suggestion that the National Security and Intelligence Review Agency conduct independent reviews of foreign interference in future Canadian general elections. Similarly, it was suggested that a regular panel be established to periodically review the impact of foreign interference in Canada to help inform Canada’s response to this evolving threat.

### Election technology

- [87] Someone suggested that consideration should be given to whether the use of electronic tabulators would be preferable to the current paper-based method used in federal elections, including whether their use would generate higher rates of voter participation.



### Education of politicians and their staff

- [88] It was suggested that politicians and their staff should be educated on foreign interference and advised of foreign proxies active in their communities.

### Increased transparency

- [89] The Commission received suggestions that increased transparency around democratic and diplomatic responses to foreign interference is needed. Concerns were voiced about the approach taken by Canada's politicians to foreign interference issues, including suggestions that they downplay CSIS intelligence when it relates to politicians as opposed to private actors, questioning the independence of the Panel of Five, and calling for the investigation, public identification, and punishment of compromised actors within Canada's politicians and a suggestion that the Panel of Five lacks the necessary institutional independence to fulfill its role.

### National security designations

- [90] It was suggested that the Islamic Revolutionary Guard Corps be designated as a terrorist organization "in practice, not just symbolically."

### Freeze on diplomatic missions during writ period

- [91] It was suggested that foreign missions in Canada be advised to refrain from engaging with diaspora community members in Canada during the writ period.

### Diplomatic responses to foreign interference

- [92] The Commission received feedback on the importance of diplomatic responses to foreign interference. The importance of the continued and increased sharing of information with Canada's allies was highlighted.
- [93] The Commission also heard calls for actions to be taken against foreign states perpetrating foreign interference and foreign diplomats acting on their behalf, including through messaging to foreign states that foreign interference in Canada's democratic processes will not be tolerated, and expelling diplomats who engage in foreign interference in Canada's democracy from the country. It was specifically suggested that



all Russian diplomatic staff should be expelled from Canada and that the Eritrean consulate in Canada be closed.

## Misinformation, disinformation, malinformation, and propaganda

### Generally

- [94] The dangers of misinformation and disinformation, and the need for constant vigilance against these tactics, featured prominently in some of the written submissions sent to the Commission and in responses to the questionnaire. Submissions highlighted the need to recognize the existence of a diversity of opinions and views within diaspora communities, and to avoid characterizing such diverse views and opinions as disinformation or false narratives.
- [95] An individual advised that Russia is using Western democratic values to target those very values and the institutions that uphold them in order to make the Canadian political system ungovernable.
- [96] Concern was expressed that the CCP and those acting on its behalf in Canada may manipulate the narrative around foreign interference in the same way that they have exerted control over the public discourse on anti-Asian hate.
- [97] Some responses to the questionnaire expressed concerns that false and misleading information had been shown on Canadian mainstream media. One response attributed this to foreign ownership of media, and another called for the repatriation of Canadian media.

### Public education

- [98] The Commission received a number of submissions suggesting that public education about the prevalence and dangers of misinformation and disinformation and how it is spread should be a component of Canada's response to foreign interference. Others called for public education about misinformation and disinformation targeting specific cultural and diaspora communities in Canada, particularly the Uyghur community, the Tibetan community, the Hong Kong community, the Falun Gong community, those advocating for democracy in China, and the Russian community.



### Importance of fact checking before publishing

[99] The Commission heard that those publishing information, including media, government, and other relevant organizations, must be scrupulous in their fact checking before publishing information that could be misinformation or disinformation to avoid causing unnecessary harm to the innocent.

### Government involvement in combatting misinformation and disinformation

[100] Certain submissions suggested that the federal government and/or related agencies should take an active role in providing accurate information and facts to counter misinformation and disinformation linked to foreign interference. It was also suggested that media organizations known to serve as propaganda outlets should not have their Canadian Radio-television and Telecommunications Commission-issued licenses renewed, and that the Canadian Radio-television and Telecommunications Commission should include this criteria in their license renewal process.

[101] A response to the questionnaire called for the federal government to take action against foreign disinformation actors earlier and openly.

### Funding for organizations combatting misinformation and disinformation

[102] A suggestion was made that Canada should provide funding to organizations seeking to combat misinformation and disinformation, particularly emanating from the PRC. Support for independent Chinese-language media reflecting Canadian values, promoting democracy, and encouraging civil participation was suggested as a means of countering narratives emanating from the CCP.

### Regulation and accountability for social media platforms and their use

[103] The Commission received suggestions that social media platforms should be regulated, including the introduction of stronger legal mechanisms to hold individuals and social media companies accountable for misinformation and disinformation published on such platforms. It was suggested that Chinese technology and social media companies should be banned.



## Direct Communications

[104] The Commission heard about community organizations participating in local events where they denied facts about the actions of hostile foreign states to present such states in a better light to event attendees.

[105] Individuals who responded to the Commission's questionnaire indicated that they have observed foreign interference in a Canadian federal election or in Canadian democratic processes in the form of false, misleading, or inaccurate information conveyed on chat and/or direct messaging applications.

[106] Individuals from the Falun Gong community advised the Commission that others had impersonated members of their faith, sending problematic communications to Canadian politicians in order to deter those politicians from engaging with or supporting Falun Gong.

## Traditional and social media

[107] Some submissions reported disturbing increases in the exposure of Russian Canadians to Russian state-controlled media outlets and disinformation on social media, and expressed concern about the spread of Russian propaganda in Canada by local Canadians and Canadian politicians.

[108] The Commission received submissions highlighting anti-Chinese bias in mainstream media. The Commission was advised that articles published in English language media were indiscriminately labelling every Chinese person, including Chinese Canadians, as foreign state agents. Concern was shared with the Commission about unsubstantiated allegations of involvement in foreign interference, including worries that simply having a good relationship with a foreign state may lead to the erroneous conclusion that one is an agent or proxy of that foreign state. The Commission heard that an innocent photo taken at the commemoration of the 100<sup>th</sup> anniversary of the *Chinese Exclusion Act* was published along with reports of alleged secret Chinese overseas police stations, implying that those pictured were linked to the allegations. An individual featured in the image described the experience as "heartbreaking".



- [109] The Commission heard from members of several different diaspora communities that they are falsely accused of a number of things, including that they are murderers, terrorists, and/or members of a cult, to dissuade people from supporting them.
- [110] The Commission was warned that WeChat is a tool of the CCP that can be used for monitoring, control, and the sharing of its propaganda in Canada.
- [111] An individual involved in community cultural media described efforts by a foreign state to silence their work, including through direct and indirect harassment, disinformation, and efforts to deter their sponsoring advertisers.
- [112] The Commission heard that foreign actors frequently conduct cyberattacks to collect personal information. This information is then used to target the cyberattack victims with misinformation, disinformation, and malinformation campaigns over social media.
- [113] Some comments pointed to the importance of social media as a news dissemination platform. Concerns were expressed that people who consume news via social media platforms will be unfairly accused of having been misled based on their chosen news source, unfairly undermining the legitimacy of their views.
- [114] Individuals who responded to the Commission's questionnaire indicated that they have observed foreign interference in a Canadian federal election or in Canadian democratic processes in the form of false, misleading, or inaccurate information on an online news source or social media.

#### [Impact of being targeted by misinformation, disinformation, and malinformation](#)

- [115] The Commission heard from people who described the effects and consequences of being the target of misinformation and disinformation, including damage to reputation, credibility, mental health, isolation from the community, and the increased risk that the subject would be further targeted by others. They described targets being used as examples of the bad things that can happen when acting contrary to the wishes, goals, strategies, and tactics of a foreign power.



## Surveillance, Threats, and Harassment

### To Individuals and Groups in Canada

- [116] The Commission heard from individuals who have received threats, including death threats, in response to their efforts to advocate for change in a foreign state and their work related to and on behalf of diaspora communities in Canada.
- [117] Individuals attending protests in Canada were followed and monitored, including through the use of tracking devices, by persons suspected of being foreign state agents or proxies. The Commission was told about an individual who was filmed while attending a peaceful protest, and subsequently identified and doxed.
- [118] Counter-protests are used to intimidate and dissuade individuals from advocating to the Canadian government for change in Canada and abroad.
- [119] The Commission heard about bogus allegations made to law enforcement leading to the wrongful detention and arrest of individuals, along with related long-term repercussions for themselves, their personal and professional reputation, and their family. The Commission was told by some journalists working in cultural community media that they take precautions when reporting on topics that may draw negative attention from hostile foreign states and those working on their behalf. They also told the Commission that they fear that their work will lead to retaliation against their families in Canada and abroad.
- [120] Targets of surveillance and threats from a foreign state reported about the tremendous strain they are living with and its negative impacts on romantic and family relationships. The Commission was told that the prevalence of threats and the perceived reach of foreign states has led advocates in Canada to sever ties with family members abroad for their family's safety.
- [121] The Commission heard about intrusions into worship gatherings hosted by a faith-based organization, as part of a coordinated effort against Hong Kong democracy advocates, and the defacement of that organization's property.



[122] A submission noted that advocates have been told that people will not come to their events or be seen with them in public for fear of the consequences of being associated with them in the eyes of a foreign state.

[123] An organization shared a report detailing the official policies, methodology, and data on the PRC's extra-judicial return operations including open-source reports on almost 300 individual cases of forced returns from over 55 countries including Canada.

[124] An individual told the Commission that many Chinese Canadians live in a pervasive climate of fear of repercussions from the CCP, which can lead to self-censorship and a disinterest in, and disengagement from, Canadian politics.

[125] The Commission heard that people hold the view that the government of Canada's agencies have failed to adequately investigate their reports of threats and harassment by foreign states and those acting on their behalf. The Commission also heard that they were advised to reduce their public activities and "lay low", which to them raises serious concerns about public safety and national security.

[126] Individuals who responded to the Commission's questionnaire indicated that they have observed foreign interference in a Canadian federal election or in Canadian democratic processes in the form of pressure, threats, or incentives to influence a person's vote or their decision about whether to vote. Examples provided include witnessing threats to candidates and receiving death threats via voicemail related to political positions taken by the recipient.

### To Loved Ones in Foreign State

[127] The Commission heard a number of accounts of threats and actions taken by foreign states and those acting on their behalf against loved ones living in these states in response to the actions of private individuals in Canada.

## Leverage of Organizations

### Community Organizations

[128] People reported being isolated and excluded by their communities, and community organizations, and feared isolation for speaking out against actions of a foreign state.



## Academic Institutions and Related Organizations

[129] The Commission received a warning about the sizeable grants the CCP makes available to foreign academic institutions, including in Canada, leaving those institutions at risk of weaponizable dependence on the CCP. Further, the unconditional trust academics may place in collaborators enhances this risk.

## Potential Consequences of Efforts to Detect, Deter, and Counter Foreign Interference

### Government Overreach

[130] An important theme running through many of the submissions received is fears about unsubstantiated overreach in Canada's efforts to detect, deter, and combat foreign interference, and concerns about related consequences. In particular, the danger of unsubstantiated allegations of involvement in foreign interference based on racism, and the significant harm such unsubstantiated allegations may cause the targets and their loved ones were mentioned. People discussed the need to balance Canada's national security concerns against the need to support and protect members of the Canadian public from unfair allegations, discrimination, and marginalization. On the other hand, people shared their views that appropriate investigation of potential foreign interference does not constitute racism and cautioned that anti-Asian racism may be weaponized to frustrate needed efforts to detect, deter, and counter foreign interference.

### Concerns about anti-Asian racism

[131] People observed that the historical exclusion of Chinese Canadians from important aspects of public life has had long-lasting consequences, including their underrepresentation in Canadian institutions. The Commission was cautioned against Canada repeating the mistakes of the past in its treatment of Chinese Canadians.

[132] People shared their fears that the Chinese Canadian community will be unfairly targeted. More than one individual expressed the concern that members of the Chinese Canadian community will be unfairly and inaccurately treated as a single, homogenous group instead of recognizing that the community is comprised of individuals who hold a



variety of different, and sometimes conflicting, views. The detailed concerns shared with the Commission included concerns that people will be unfairly targeted in Canada's efforts to detect, deter, and counter foreign interference where they have legitimate, open close relationships with Chinese authorities and where their genuinely held views and positions align with those of the CCP.

[133] The Commission heard from people who had been the targets of anti-Asian racism in Canada, and that recent increases in anti-Asian and anti-Chinese incidents and sentiments have made people afraid for their loved ones and communities. More specifically, members of the public advised the Commission of their fears for themselves, their families, and members of their communities, particularly children, as the public discussion around foreign interference in Canada stokes racist rhetoric and discrimination against visible minorities, particularly Asian Canadians. The Commission also heard that these unintended consequences have negative ripple effects, including increasing self-censorship within targeted communities and sowing seeds of distrust within such communities. These forces include overreactions and an apparent eagerness to treat unsubstantiated allegations as fact or near-fact to the detriment of those targeted.

[134] More generally, the Commission heard that members of diaspora communities are afraid that the Canadian public will view them as belonging to a monolithic, homogenous group, and that one bad fact will be used against the entire community with no appreciation for the diversity of experiences and views therein. The Commission received written submissions from people reporting that they had been accused of being proxies for hostile foreign states, including for the CCP. The Commission heard specific concerns about the notion of individuals in Canada acting on "implicit instructions" from foreign states. People expressed the view that to use such a standard would be demeaning and counterproductive. These submissions also pointed out that the alignment of views with a foreign state does not mean that the individual is acting in concert with or on behalf of that foreign state, nor does it mean that they have been interfered with by that foreign state. Conversely, the Commission received written submissions from individuals reporting that they had been accused of being



manipulated by foreign states. In both circumstances, individuals reported suffering unwarranted reputational harm.

[135] Some individuals fear the consequences of disproportionate focus on a particular foreign state for members of that diaspora in Canada.

[136] The Commission heard that there are a variety of legitimate reasons for maintaining ties with a foreign state – reasons that have nothing to do with foreign interference. The Commission heard about the fear that such ties will lead to unwarranted suspicion that those with legitimate ties to foreign states will unfairly be seen as agents or proxies of that state.

#### Chilling Effect on Political Participation

[137] The Commission heard that unfounded allegations of links to hostile foreign states have interfered with or stopped individuals from pursuing public office.

[138] There is fear that Chinese Canadians will be further excluded from Canada's political arenas. Already, Chinese Canadian MPs and community leaders have been subjected to unsubstantiated allegations that they are PRC proxies, and people have concerns that the passage of Bill C-70 will make this worse. The Commission heard that baseless attacks on and slander of Chinese Canadian politicians undermines Canada's democracy.

[139] Individuals who responded to the Commission's questionnaire mentioned that foreign interference they observed in Canada's federal election or democratic processes dissuaded them from volunteering for election-related activities and/or discouraged them from voting.

#### Undermining of fundamental rights

[140] The Commission heard that Bill C-70 imposes a heavy burden on Canadians who may feel compelled to choose risk-adverse responses likely to undermine their right and freedom to participate in Canada's democratic processes because Bill C-70 lacks definitions for many concepts found therein, raising concerns about excessive and overenforcement against innocent people.



[141] There are concerns about potential overreach and abuse of power by Canada's national security agencies given the broad powers conferred on them by Bill C-70. The Commission also received questions about how the new powers conferred on Canada's national security agencies will be regulated. There is also fear as regards the broad powers Bill C-70 appears to give to Canada's law enforcement agencies and how those powers may be used.

#### Negative consequences for community supports and resources

[142] Individuals mentioned the backlash that accompanied the RCMP's allegations and related work about secret Chinese overseas police stations in Canada, particularly Montreal. One common message was about the damage done to the resources and supports offered to the Chinese Canadian community through the locations targeted. The Commission heard about the loss of important funding sources, the destabilizing effect of the allegations on those working with and through the targeted locations to serve community members, the demoralization of those who use and provided services to the community through the targeted locations, and the chilling effect on members of the community, none of whom wanted to become the subject of RCMP investigations.

#### Negative consequences for academia

[143] The Commission received a submission arguing in favor of the importance of collaborative research work with other foreign states and warnings against overreacting in placing restrictions on the work that can be done with other countries. The Commission received warnings that such overreach in the academic and research sphere could, among other things, lead to a "reverse brain drain", a decrease in the number of Chinese students attending Canadian post-secondary institutions, and the undermining of Canada's status globally when it comes to science and technology.

#### Combatting unintended consequences of efforts to detect, deter, and counter foreign interference

[144] The Commission heard about the need to understand and accept there are established patterns of discrimination operating within Canadian society and institutions, particularly with respect to Chinese Canadians, in order to develop and implement antiracism



programs and to identify true acts of foreign interference and transnational repression. It was stated that Canadian institutions need to move beyond victim blaming and work from a fully developed understanding of what racism is and how it impacts us all.

### Actions by the foreign state in the foreign state

[145] The Commission also heard information about actions taken by foreign states within the foreign state. This subject matter, while beyond the Commission's mandate, provides context for the experience of foreign interference in Canada, and is included herein for that reason only.

#### Impediments to travel

[146] In some instances, individuals are not able to travel to specific foreign states where they have history and/or loved ones because of the potential consequences arising from their activities, including activism and participation in the political system, in Canada. In particular, people fear that their advocacy efforts in Canada will lead to prosecution under China's National Security law. According to one individual, the denial of visas is also a tactic used to leverage cooperation from people.

#### Human rights abuses

[147] The Commission received report of what the author called a disturbing crackdown on Uyghur cadres in East Turkistan, including arbitrary detentions, forced disappearances, and extensive surveillance.

#### Calls for Canada to engage with hostile foreign states

[148] Submissions called for Canada to engage with hostile foreign states to urge them to end their foreign interference and transnational repression in Canada, including submissions suggesting that Canada engage with Beijing and should call on the Eritrean regime to respect the human rights of its citizens and implement the rule of law. It was also suggested that Canada work in solidarity with local human rights groups to fight human rights violations by foreign governments in their own states, and with its international partners to address transnational repression globally.



## Call for Canada to refrain from interfering in the domestic policy of other states

[149] Someone suggested that Canada should stop interfering in the domestic policy of other states, with a specific mention of Iran as a state Canada should not seek to interfere with.

## Contributions regarding Eritrea

[150] The Commission received a substantial number of submissions and questionnaire responses specifically addressing the actions of the Eritrean regime, both within Eritrea and in Canada. Those submissions, which are sometimes beyond the Commission's terms of reference, are summarized below.

[151] The Commission heard that Eritrean agents have infiltrated Eritrean Canadian community-based organizations and use those organizations to spread the ideology of the Eritrean regime. Many individuals underlined the fact that persons acting on behalf of the Eritrean government have taken over a faith-based organization in Canada, ostracizing and threatening those who seek to resist the changes implemented.

[152] Many individuals referred to the collection of funds, sometimes described as a tax, from members of the Eritrean Canadian community to be paid to the Eritrean government. Access to community services and functions is used as a lever to enforce the collection of such funds.

[153] Furthermore, certain community groups that provide immigration-related services have sponsored people making false refugee claims from Eritrea.

[154] The Commission heard that the Eritrean regime is growing bolder in its harassment of Eritrean Canadians.

## Stop Eritrean control of Eritrean faith-based organizations in Canada

[155] The Commission received a number of calls for assistance from the Canadian government regarding the control of Eritrean churches in Canada by the Eritrean government and its agents, which people say has manifested in illegitimate changes to the churches' administrative structure, denial of faith-based services, and the collection of monies to the benefit of the Eritrean government.



## Stop Eritrean Canadian community organizations from interfering with Eritreans in Canada

[156] A number of submissions called generally for the protection of Eritrean diaspora members from foreign interference and transnational repression by Eritrea. More specifically, the Commission received submissions calling for the investigation into and Canadian government action against Eritrean Canadian community organizations perpetrating foreign interference and transnational repression against community members.