



CANADIAN MUSLIM
PUBLIC AFFAIRS
COUNCIL

August 28, 2025

To:

Department of Finance Canada

90 Elgin Street
Ottawa, ON K1A 0G5

VIA EMAIL: yourbudget-votrebudget@fin.gc.ca

The Honourable François-Philippe Champagne

Minister of Finance
Department of Finance Canada
House of Commons
Ottawa, ON K1A 0G5

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The Honourable Ryan Turnbull

Parliamentary Secretary to the Minister of Finance and Revenue
House of Commons
Ottawa, ON K1A 0A6

VIA EMAIL: ryan.turnbull@parl.gc.ca

Dear Minister and Parliamentary Secretary,

RE: CMPAC Submission for Budget 2025

On behalf of the Canadian Muslim Public Affairs Council (CMPAC), we are pleased to submit our recommendations for Budget 2025. CMPAC represents Muslim communities across Canada and works to dismantle structural Islamophobia, promote inclusion, and strengthen public safety while upholding rights. This submission builds on [CMPAC's 2024 pre-budget priorities](#) and ongoing policy work, including national consultations on anti-Muslim hate, anti-Palestinian racism (APR), charity-sector oversight, and immigration support.

Budget 2025 presents an opportunity for Canada to invest in evidence-based, equitable policies that protect communities from violence, ensure accountable governance, strengthen immigration pathways, and enhance research and institutional capacity to combat discrimination. The following recommendations outline practical, rights-based measures that can help achieve these goals.

Executive Summary

CMPAC recommends that Budget 2025 prioritize targeted, evidence-based measures to strengthen equity, security, and inclusion for Muslim communities and Palestinians in Canada, while ensuring transparent, fair, and rights-respecting public institutions. These recommendations build on CMPAC's ongoing research, consultations, and policy submissions from 2024–2025. Specifically, Budget 2025 should:

1. **Combat Islamophobia and Anti-Palestinian Racism:** Implement standardized mandatory training for front-line officers, program managers, and policy analysts; update the federal Anti-Racism Strategy to explicitly include anti-Palestinian racism; and resource Statistics Canada to collect and report disaggregated data, with departments publishing annual accountability reports.
2. **Enhance Physical and Online Security for Muslim Communities:** Expand the Community Security Infrastructure Fund to improve protection for mosques, schools, and community centres, including culturally competent security training. Establish a National Cyber-Resilience Initiative to address online hate, harassment, and disinformation targeting Muslim communities.
3. **Expand the Office of the Special Representative on Combatting Islamophobia (OSRCI):** Increase staffing, research capacity, and victim-support services; publish dashboards and reports to monitor trends; and strengthen community partnerships to ensure federal responses are practical and community-informed.
4. **Modernize Charity-Sector Oversight:** Reform the National Interest Revocation Act (NIRA), restructure or replace the CRA's Review and Analysis Division (RAD), and establish independent oversight mechanisms to ensure fair, transparent, and evidence-based governance of charities, particularly Muslim-led organizations.
5. **Replace the Countering Violent Extremism (CVE) Framework:** Dismantle the current CVE framework and implement a rights-respecting, evidence-based public safety model, with independent design and evaluation, community-led prevention programs, rights-based law enforcement training, and transparent monitoring.
6. **Strengthen Immigration Pathways and Supports:** Address systemic discrimination against applicants from Muslim-majority countries across all immigration pathways, ensuring fair, transparent, and culturally competent processing. As part of this effort, the Gaza TRV program should be reformed by removing caps, introducing clear eligibility criteria, providing fee waivers, implementing trauma-informed interviews, and offering direct diplomatic and settlement support. Additional measures include expanding legal aid for vulnerable applicants and requiring IRCC to publish disaggregated decision data to improve accountability and equity.
7. **Provide Comprehensive Support to Rebuilding Gaza and Palestinian Territories:** Commit predictable, multi-year funding for health, education, food security, psychosocial services, and infrastructure reconstruction in Gaza and other Palestinian territories affected by conflict. Support UNRWA and other frontline humanitarian agencies, and expand settlement and mental health programs for Palestinians resettled in Canada to address long-term needs of displaced communities.
8. **Strengthening Oversight and Accountability of CBSA:** Robust reforms to the Canadian Border Services Agency (CBSA) to address systemic discrimination, structural Islamophobia, and gaps in oversight. While the Public Complaints and Review Commission (PCRC) is a step forward, it must be strengthened to handle systemic complaints, allow third-party submissions, ensure independent investigations, and provide meaningful redress. Enhanced accountability and

transparency within CBSA are essential to protect civil liberties, rebuild trust with communities, and ensure fair, equitable treatment at Canada's borders.

Detailed Recommendations

1. Combating Islamophobia and Anti-Palestinian Racism

Budget 2025 must make targeted investments to address systemic Islamophobia and APR across the federal government. This includes mandatory training for designated decision-makers such as frontline officers, program managers, and policy analysts. Training must be standardized and developed in collaboration with community partners and experts. The federal Anti-Racism Strategy should be updated to explicitly include APR, and a Treasury Board directive should be issued to ensure inclusive program design and risk assessment. To track progress, Statistics Canada must be resourced to collect disaggregated data on Islamophobia and APR incidents, and departments should be required to publish annual reports on their efforts to combat discrimination. These investments will help build public trust, reduce systemic bias, and improve service delivery for communities.

Recent data underscore the urgency of tackling systemic Islamophobia and anti-Palestinian racism (APR) within Canada. [Police-reported hate crimes surged](#) 83% nationwide between 2019 and 2022, with religion-based hate crimes jumping from 530 to 750 cases, despite a modest decline in 2022, the overall level remains elevated compared to pre-pandemic years. More alarmingly, hate crimes against Muslims and Arabs escalated dramatically amid geopolitical tensions in late 2023; Statistics Canada has documented spikes: [94% for anti-Muslim incidents and 52% for those targeting Arabs/West Asians](#). In Toronto specifically, [incidents against Muslims rose by 93% between October 2023 and early 2024](#).

These trends threaten not only individual safety but also broader social cohesion, trust in public institutions, and economic participation. [Studies in workplace settings show](#) that discrimination and hostile environments contribute to reduced productivity, increased absenteeism, and higher litigation or settlement costs. Though Canada-specific calculations are limited, international research suggests that unchecked discrimination imposes significant economic costs through workforce exclusion, decreased labour force attachment, and elevated public-service burdens.

Against this backdrop, Budget 2025 should prioritize targeted, evidence-based investments that strengthen equity and accountability across federal institutions. Specifically:

- **Mandatory training:** Fund standardized mandatory training for key decision-makers, including front-line officers, program managers, and policy analysts. Training content must be co-developed with independent community partners and experts to ensure cultural competency and credibility.
- **Anti-Racism Strategy update:** Amend the federal Anti-Racism Strategy to explicitly recognize anti-Palestinian racism and direct departments to apply this lens in program and policy design.
- **Accountability through data:** Resource Statistics Canada to collect, analyze, and publicly report disaggregated data on Islamophobia and APR. Federal departments should also be mandated to publish annual accountability reports summarizing progress in combating discrimination.

- **Education and awareness materials:** Allocate funding to procedure culturally competent education and awareness materials across schools, workplaces, public services, and federal departments, in partnership with mainstream Muslim organizations, to address Islamophobia and APR.
- **Invest in Anti-Islamophobia resources:** Provide dedicated funding for the development and dissemination of educational, training, and community-support materials aimed at preventing Islamophobia and anti-Palestinian racism, including resources for public institutions, workplaces, and schools.

These investments would help reduce systemic bias, strengthen public trust in federal institutions, and improve equitable service delivery for Muslim and Palestinian communities across Canada.

2. Physical Security for Muslim Institutions and Combating Online Hate

Muslim communities continue to face a heightened threat environment. Budget 2025 should expand the Community Security Infrastructure Fund to provide capital funding for mosques, schools, and community centres to install safety infrastructure such as access control systems, surveillance cameras, lighting, and protective glazing. In addition to physical upgrades, training and culturally competent security protocols must be provided to staff and volunteers to ensure preparedness in times of crisis. Recognizing the increasing role of digital spaces in propagating hate, federal funds should also support online safety initiatives, including rapid-response mechanisms for harassment and doxxing, partnerships with technology platforms to improve content moderation, and grants to build cyber resilience. This comprehensive approach to security acknowledges both offline and online threats.

Muslim communities across Canada increasingly face a dangerous environment where physical spaces, such as mosques, schools, and community centres, are targeted by hate-motivated incidents. [In 2023, police-reported hate crimes targeting Muslims climbed by 94%, rising to 211 reported incidents](#), making it the second-largest increase among religious groups. In the period immediately following October 7, 2023, Toronto police confirmed a [93% surge in anti-Muslim and anti-Arab/Palestinian hate crimes](#), boosted by at least 69 arrests and 173 charges in the city.

Canada's federal Community Security Program (CCSP) has begun to respond. Launched in 2024, it replaced the Security Infrastructure Program and has since allocated over \$36 million to support more than 830 projects, funding security upgrades like CCTV, alarms, and emergency systems for religious and cultural institutions. For instance, in March 2025, the Islamic Society of North America–Canada in Mississauga received \$59,072 to install CCTV and alarms, while Edmonton's Al Rashid Mosque received \$29,663 for surveillance, access controls, and staff training. These examples reflect the real, growing demand for protective measures and how federal support can effectively reduce vulnerability.

Threats are not limited to physical spaces. Online platforms have become fertile ground for Islamophobia, including harassment, doxxing, disinformation, and organized hate campaigns. Surveys indicate that [71% of young Canadians](#) encountered online hate content in the previous year, and a 600% year-over-year increase in intolerant posts like those using #banmuslims was recorded in one study. [Emerging research shows](#) that such online hostility often correlates with or anticipates real-world acts of violence.

Given this dual-threat landscape, Budget 2025 must strengthen support for both physical and digital safety in Muslim communities. The recommendations, on behalf of CMPAC, are:

- **Expand the Community Security Infrastructure Fund (CCSP):** Increase funding levels and raise caps to help Muslim-serving organizations install robust safety infrastructure, such as access controls, reinforced glazing, emergency lighting, surveillance systems, and receive culturally competent security planning and staff training. This funding should reduce cost-sharing constraints and ensure faster access to resources for urgent needs.
- **Create a National Cyber-Resilience Initiative:** Establish federal support for rapid-response mechanisms to online hate—especially doxxing and targeted harassment—enhance partnerships with tech platforms to improve content moderation, and provide grants to Muslim organizations for digital literacy, resilience training, and community-led online safety interventions.

These proactive investments are cost-effective. Securing physical facilities reduces the need for emergency law enforcement deployment, lowers risks of vandalism or violence, and keeps critical community programming operational. Strengthening digital resilience prevents the spread of hate speech, reduces trauma and legal risks, and disrupts the pathway from online hostility to offline violence. Together, these measures bolster public safety, trust in institutions, and the inclusion of Muslim communities; a vital contribution to Canada’s social cohesion.

3. Expanding the Office of the Special Representative on Combatting Islamophobia

Building on the need for systemic reforms through training, strategy updates, and data collection, it is equally important to strengthen the institutional capacity that anchors these efforts. The Office of the Special Representative on Combatting Islamophobia (OSRCI) is central to this work but remains under-resourced. CMPAC recommends expanding the office to ensure it can deliver both oversight and tangible community support:

- **Staffing and Research Capacity:** Fund additional staff and dedicated research units to monitor Islamophobia and anti-Palestinian racism trends across Canada.
- **Public Accountability:** Regularly publish dashboards and reports to inform policy responses and track progress on combating Islamophobia and APR.
- **Community Partnerships:** Establish formal collaboration with provincial, municipal, and grassroots organizations to ensure local realities inform national strategies.
- **Victim Support Services:** Provide resources for crisis navigation, including legal referrals, mental health supports, and a small emergency fund for urgent cases.

Expanding OSRCI in these ways would ensure federal commitments move from symbolic statements to measurable, practical support, allowing Muslim communities to see concrete benefits from government action.

4. Modernizing Charity-Sector Oversight

Building upon the need for systemic reforms and strengthened institutional capacity, and informed by CMPAC's prior FATF submissions,¹ it is essential to modernize the regulatory framework governing Canada's charitable sector. Current oversight mechanisms disproportionately affect Muslim-led organizations, undermining their ability to serve communities effectively. For instance, the Canada Revenue Agency's (CRA) Review and Analysis Division (RAD) has been criticized for disproportionately auditing Muslim charities. [Despite Muslim charities constituting only 1% of all registered charities in Canada, they accounted for 75% of RAD audits and 85% of revocations, as reported by the National Council of Canadian Muslims \(NCCM\)](#). This disparity raises concerns about systemic bias and the equitable treatment of charitable organizations.

To address these inequities and align Canada's practices with international standards, CMPAC recommends the following reforms:

- **Reform the National Interest Revocation Act (NIRA):** Revise NIRA to ensure that its application is evidence-based, proportionate, and transparent, safeguarding against arbitrary or discriminatory revocations.
- **Restructure or Replace the RAD:** Overhaul the RAD to eliminate systemic bias, end reliance on politicized foreign intelligence, and ensure due process protections for all charities under investigation. Implement residual risk analysis to identify organizations with genuine compliance risks while minimizing arbitrary or disproportionate interventions.
- **Establish Independent Oversight Mechanisms:** Allocate funding to create independent bodies that can review audits and sanctions impartially, providing charities with fair appeal pathways and enhancing public trust in the regulatory process.
- **Incorporate Evidence from CMPAC's FATF Submissions:** Use the findings and recommendations from CMPAC's prior submissions to FATF to guide reforms and prevent regulatory frameworks from inadvertently targeting Muslim-led charities.

Implementing these reforms will not only protect the integrity of Canada's charitable sector but also ensure that all organizations, regardless of their community focus, are subject to fair and transparent oversight.

5. Replacing the Countering Violent Extremism Framework

Building on the need for systemic reforms, institutional capacity, and equitable oversight, it is critical to address how Canada's public safety frameworks impact Muslim and racialized communities. The current Countering Violent Extremism (CVE) framework has been [widely criticized for disproportionately targeting Muslim communities](#), contributing to stigmatization, and eroding trust between law enforcement and the communities they serve. [Research indicates](#) that CVE programs often focus on racialized communities while providing limited evidence of effectiveness in reducing extremism.

¹ [CMPAC's Consultation on Strengthening Canada's AML & CTF Regime; CMPAC Consultation Submission on the Financial Action Task Force \(FATF\) Revision of R8 of the FATF Standards and its Interpretive; CMPAC Submission Financial Action Task Force \(FATF\) Best Practice Paper to Combat the Abuse of Non Profit Organizations](#)

CMPAC recommends that Budget 2025 dismantle the current CVE framework and replace it with a rights-respecting public safety model guided by evidence and proportionate risk assessment. Specifically:

- **Independent Design and Evaluation:** Establish an independent expert panel to design the new framework and ensure ongoing evaluation to measure effectiveness, fairness, and community impact.
- **Redirect Funding to Community-Led Programs:** Prioritize investment in prevention initiatives led by local organizations, including youth engagement, mentorship programs, and culturally informed education.
- **Rights-Based Law Enforcement Training:** Provide mandatory training for law enforcement officers on rights-respecting practices, anti-bias approaches, and culturally competent engagement with diverse communities.
- **Transparent Monitoring and Reporting:** Implement clear mechanisms to track outcomes, including public reporting on program impact, community feedback, and oversight of resource allocation.

Replacing the CVE framework with a fair, transparent, and evidence-based model will improve public safety outcomes while restoring trust between communities and public institutions, ensuring that interventions are targeted, proportionate, and rights-respecting.

6. Strengthening Immigration Pathways and Supports

Building on the need to reform public safety and community-focused policies, CMPAC emphasizes that equitable and transparent immigration processes are essential to upholding Canada's commitments to human rights, fairness, and social inclusion. [Evidence indicates](#) that racialized and marginalized communities often face systemic barriers in immigration processes, from visa eligibility to access to legal support. To address these challenges, Budget 2025 should prioritize targeted investments to strengthen immigration pathways and support for vulnerable populations, including students and humanitarian applicants.

Key recommendations include:

- **Address Systemic Discrimination Against Muslim Applicants:** Implement measures across all immigration programs to ensure fair, transparent, and culturally competent processing for applicants from Muslim-majority countries. This includes refugee, humanitarian, family reunification, and student pathways, reducing bias and improving equitable access to protection and services.
- **Enhance the Gaza Temporary Resident Visa (TRV) Program:** Remove the current cap and allow for unrestricted admissions of eligible Gaza residents, prioritizing vulnerable populations such as women, children, the elderly, and persons with disabilities. Implement transparent, open, and efficient processing, replacing the current discriminatory and arbitrary system. Introduce clear

eligibility criteria, fee waivers for low-income families, trauma-informed interviewing, and expanded case management to ensure timely and fair processing for applicants in high-risk conflict zones. Facilitate entries through dedicated diplomatic and consular channels and integrate settlement supports, including healthcare, education, and social services, for all approved applicants.

- **Support Student Immigration Programs:** Allocate resources for bridging permits, campus settlement services, and culturally competent mental-health supports for international students and refugee youth.
- **Expand Legal Aid for Humanitarian and Family Reunification Cases:** Ensure low-income applicants and vulnerable populations have access to legal representation, particularly in cases involving humanitarian grounds, family reunification, or urgent protection needs.
- **Improve Transparency and Accountability:** Require IRCC to publish disaggregated decision data, including approvals and refusals, along with clear rationales for decisions, to allow for independent oversight and continuous improvement of immigration processes.

Implementing these measures will improve fairness, efficiency, and trust in Canada's immigration system, ensuring that newcomers, particularly those from marginalized or crisis-affected communities, can access protection and opportunities safely and equitably.

7. Comprehensive Support to Palestinians

Canada has a responsibility to ensure sustained humanitarian assistance and reconstruction support for Palestinians. The crisis in Gaza and other Palestinian territories has devastated health, education, housing, and livelihoods, leaving millions dependent on international aid. Beyond immediate relief, long-term investments are required to rebuild infrastructure, address trauma, and support displaced communities, including Palestinians who have arrived in Canada under temporary measures and need tailored settlement support.

According to the [UN Office for the Coordination of Humanitarian Affairs \(OCHA\)](#), Gaza is experiencing unprecedented levels of humanitarian need, with collapsed health services, catastrophic food insecurity, and widespread trauma among children. [UNICEF](#) further emphasizes that psychosocial support and education disruptions are among the most urgent needs, particularly for children exposed to prolonged violence. CMPAC submits that sustained, multi-year funding commitments are critical to rebuilding infrastructure and ensuring humanitarian programs are not undermined by short-term or unpredictable aid cycles. In Canada, the [Canadian Refugee Council](#) has noted that refugees and displaced Gazans face unique settlement and mental health challenges, requiring tailored supports that go beyond what is typically provided.

To meet both urgent needs and long-term recovery, the Canadian government should:

- **Predictable Multi-Year Funding:** Provide long-term, stable humanitarian and development assistance for Gaza and other Palestinian territories, ensuring that health, education, food security, and psychosocial services are not disrupted by short funding cycles.

- **Support for UNRWA and Humanitarian Agencies:** Guarantee consistent financial and political support for UNRWA and other frontline humanitarian partners, resisting defunding pressures that would endanger essential services.
- **Investment in Reconstruction:** Allocate resources for rebuilding critical infrastructure across Gaza and the Palestinian territories, including housing, water, and health systems, with oversight to ensure compliance with international law.
- **Settlement and Mental Health Support in Canada:** Expand programs for Palestinians resettled in Canada, including trauma-informed care, housing assistance, and community integration initiatives that address their unique needs.

8. Strengthening Oversight and Accountability of CBSA

CBSA plays a central role in immigration enforcement, border control, and national security, but operates without the robust oversight mechanisms applied to other law enforcement agencies. CMPAC urges the government to prioritize comprehensive reforms to ensure accountability, transparency, and fairness in CBSA's operations. While the establishment of the Public Complaints and Review Commission (PCRC) represents progress, it must be strengthened to address systemic discrimination, structural Islamophobia, and disproportionate impacts on Muslim and racialized communities.

CMPAC recommends:

- **Expanding the PCRC mandate** to ensure independent investigations into systemic complaints against CBSA, not only individual cases.
- **Facilitating third-party and community-based complaints**, ensuring that vulnerable communities can safely raise concerns about CBSA misconduct.
- **Ensuring recourse and redress mechanisms** that provide meaningful remedies for individuals harmed by CBSA decisions, including unjust denial of entry.
- **Guaranteeing judicial recourse** for accountability beyond administrative processes.
- **Addressing structural bias and Islamophobia** within CBSA policies and practices through mandatory anti-racism training, audits, and policy reform.
- **Strengthening transparency requirements**, including regular public reporting on complaints, outcomes, and systemic reforms.

By bolstering oversight, recourse, and accountability mechanisms, Canada can ensure that CBSA operates in line with democratic values, upholds civil liberties, and fosters equitable treatment of all communities.

Conclusion

CMPAC appreciates the opportunity to contribute to Budget 2025 consultations. The recommendations presented are practical, research-informed, and fiscally responsible. They collectively address critical gaps in security, fairness, and inclusion, while ensuring that Canada upholds its commitments under the *Charter of Rights and Freedoms* and international law. By implementing these measures, the Canadian government can demonstrate leadership in protecting vulnerable communities, strengthening public trust in institutions, and fostering equitable and sustainable societal outcomes. CMPAC looks forward to engaging further with Finance Canada and other departments on translating these recommendations into concrete, actionable policies.

Sincerely,

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