



CANADIAN MUSLIM
PUBLIC AFFAIRS
COUNCIL

CMPAC Commentary on Bill C-9 Committee Deliberations

The Canadian Muslim Public Affairs Council (CMPAC) calls on the Chair of the Justice Committee to rule any amendment creating a new “*promotion of terrorist activity or terrorist groups*” offence as out of order. The proposed amendment would introduce a separate and distinct Criminal Code regime for terrorism offences under Part II.1. [Bill C-9’s mandate](#), by contrast, is limited to addressing hate crimes, hate propaganda, public display of hateful or terrorist-linked symbols, and access to religious or cultural spaces. Parliamentary procedure requires that clause-by-clause amendments be related to the provisions already under study. The [recent example of Bill C-12](#), in which several amendments were ruled out of order for straying beyond the scope of the bill, demonstrates that Parliament has a consistent practice of guarding against such “*legislation-by-ambush*.” By grafting a wholly new terrorism offence onto a hate-crimes bill at the last minute, proponents are circumventing meaningful debate, comprehensive departmental review, and proper public consultation.

Substantively, CMPAC joins civil society in warning that such an offence would be constitutionally defective, duplicative, and dangerously vague. In 2019, Parliament repealed section 83.221 of the Criminal Code, the offence of “advocating or promoting the commission of terrorism offences in general,” through [Bill C-59](#) after extensive Charter-based criticism from legal experts and [parliamentary committees regarding its breadth and susceptibility to misuse](#). The current proposal goes even further. It relies on undefined concepts such as “promoting” and “terrorist activity or terrorist groups,” despite longstanding jurisprudence cautioning that such open-ended terminology invites subjective and discriminatory enforcement, particularly against Muslim, Arab, and Palestinian communities. Introducing a new offence of this scope amid an already documented pattern of over-policing peaceful Palestinian solidarity and anti-genocide activism significantly heightens the risk of violating constitutionally protected expression, dissent, and assembly.

CMPAC emphasizes that introducing an entirely new terrorism offence at the *end* of an already rushed and contested committee study is inconsistent with democratic process, deprives the public of meaningful consultation, and violates core principles of legislative integrity. Such an amendment expands the Criminal Code far beyond the four corners of Bill C-9, is incompatible with the bill’s purpose, and would substantially alter unrelated statutory frameworks. For these reasons, and in keeping with established parliamentary procedure, we respectfully submit that the amendment must be ruled **out of scope and therefore out of order**.