



CANADIAN MUSLIM
PUBLIC AFFAIRS
COUNCIL

CMPAC POLICY BRIEF

April 2026

CMPAC Policy Brief: April 2026

EXECUTIVE SUMMARY

Recent legislative, foreign policy, and national security developments have significant implications for constitutional governance, humanitarian commitments, and the rights of Canadian Muslim communities. These issues require careful consideration to ensure that federal action remains consistent with the Canadian Charter of Rights and Freedoms, international humanitarian law, and principles of equitable and accountable governance.

Bill C-9, the Combatting Hate Act, currently under review in the Senate, introduces amendments to the Criminal Code that raise substantial constitutional concerns. Legal analyses indicate that certain provisions risk encroaching upon freedoms of expression, religion, association, and peaceful assembly. Legislative measures aimed at addressing hate must be narrowly tailored, evidence-based, and developed through meaningful consultation to avoid disproportionate impact on minority faith and racialized communities.

Similarly, Bill C-22, the Lawful Access Act, proposes significant expansions to Canada's lawful access and digital surveillance framework. While the government frames the bill as a modernization of investigative tools to address serious crime in the digital age, it has raised substantial concern regarding expanded state access to digital information and the adequacy of privacy and civil liberties safeguards. Critics argue that the proposed protections are insufficient to prevent potential overreach, particularly given the breadth of information that may be accessed and the absence of clearly defined, robust independent oversight mechanisms. As with Bill C-9, these developments underscore the importance of ensuring that legislative responses to security challenges do not come at the expense of fundamental privacy rights and Charter protections.

With respect to Gaza, Canada's engagement must extend beyond immediate humanitarian assistance toward a coordinated, long-term reconstruction and development framework. The widespread destruction of civilian infrastructure, healthcare institutions, and education systems necessitates sustained international support. Canada's commitments under international law require advocacy for unhindered humanitarian access, support for rebuilding essential services, and investment in community-driven recovery initiatives that enable long-term stability and dignity. The Gaza Temporary Resident Visa (TRV) Family Reunification Program continues to face serious implementation challenges. Limited arrivals, prolonged processing delays, and barriers are also affecting Palestinian students admitted to Canadian institutions, resulting in significant educational disruption. A restructured, rights-based approach that prioritizes expedited processing, family unity, and administrative accountability is necessary to ensure the program meets its stated humanitarian objectives.

Addressing these matters requires principled federal leadership that safeguards constitutional freedoms, strengthens public trust, and ensures that Canada's domestic and international policies reflect consistency, accountability, and the rule of law.

POLICY BRIEF

KEY ISSUES AND RECOMMENDATIONS

1. Opposition to Bill C-9: The Combatting Hate Act

As currently being reviewed in the Senate, Bill C-9 expands the Criminal Code in ways that raise serious constitutional, legal, and community-level concerns, particularly regarding Charter-protected freedoms of expression, religion, association, and peaceful assembly. CMPAC's [initial analysis](#) and [secondary analysis](#) of committee proceedings shows that vague provisions could criminalize lawful speech, peaceful protest, or religious instruction, particularly affecting Muslim, Palestinian, and other faith communities..

Recommendations:

- The government of Canada should withdraw Bill C-9 in its current form to prevent infringements on fundamental freedoms, including lawful expression and religious practice.
- The government of Canada should initiate a structured consultation process involving legal scholars, civil liberties organizations, faith-based groups, and affected communities, to effectively combat hate.
- CMPAC is working with the Senate to address the shortcomings in the legislative process by undertaking broader and more meaningful consultations, particularly with communities that were not adequately heard.
- CMPAC is also working with the Senate to introduce the necessary amendments and safeguards to mitigate the risks this legislation poses to religious freedoms, civil liberties, and constitutionally protected rights.

2. Concerns Regarding Bill C-22, the *Lawful Access Act*

Bill C-22 proposes a significant expansion of Canada's lawful access and digital surveillance authorities, with implications for privacy rights, due process and Charter protections. In its current form, the bill raises concerns about the breadth of data access, the threshold for authorization, and the absence of sufficiently robust, independent oversight mechanisms. Without stronger safeguards, these measures risk normalizing intrusive surveillance practices and disproportionately impacting marginalized and racialized communities, including Canadian Muslims.

Recommendations:

- The Government of Canada should pause the advancement of Bill C-22 in its current form and conduct comprehensive constitutional review to ensure full compliance with the Canadian Charter of Rights and Freedoms, particularly sections 7, 8, and 2.
- The Government should narrow the scope of data access provisions by clearly defining the categories of information that may be obtained and limiting access to what is strictly necessary and proportionate for specific investigations.
- The Government should initiate structured consultations with civil liberties organizations, legal experts, technology specialists, and affected communities to co-develop amendments that balance public safety objectives with fundamental rights.

3. Development and Rebuilding of Gaza

CMPAC is keen to support efforts toward a meaningful Canadian contribution to the recovery and reconstruction of Gaza. Post-conflict engagement should extend beyond immediate humanitarian assistance to include structured, sustainable reconstruction of essential civilian infrastructure, including the re-building of the decimated healthcare and education sectors. Recovery efforts should be complemented by diplomatic measures including advocacy for the lifting of the blockade, securing unhindered humanitarian access, and ensuring compliance with international law to prevent further cycles of oppression. This will be very well received by the Muslim community.

Recommendations:

- Support a comprehensive, long-term reconstruction strategy beyond emergency aid.
- Coordinate aid with multilateral and local partners and Canadian relief and development organizations who have experience in Gaza for effectiveness and sustainability.
- Continue to advocate for the lifting of the blockade and unhindered humanitarian access.
- Promote community-driven economic and educational recovery initiatives.

4. Gaza Temporary Resident Visa (TRV) Family Reunification Program

Nearly two years after the [launch of the Gaza TRV](#) Family Reunification Program, it continues to fall far short of its stated objective where fewer than 970 individuals have reached Canada, largely through self-arranged evacuation efforts, and an estimated 500 applicants have died while awaiting processing. At the same time, Palestinian students with acceptances to Canadian universities are unable to obtain study permits. As a result, students have lost academic terms, forfeited admission and their future educational pathways have collapsed.

Demands and Emerging Opportunities Post-Ceasefire

- Urge IRCC to expand eligibility and accelerate TRV processing for applicants in Gaza and Egypt and ensure family reunification at the border.
- Simplify or waive excessive security and biometric requirements: Adjust or remove impractical biometrics and documentation rules that prevent evacuation in conflict zones.
- Ensure full family unity at the border and in Canada.

- Ask for a public commitment from the Prime Minister and relevant ministers to address systemic failures in the program.
- Finalize and approve outstanding study permit applications for 130 accepted Palestinian students without delay.

5. Protection of the Muslim Community's Charity Sector

CMPAC [notes](#) the findings of the National Security and Intelligence Review Agency (NSIRA) regarding the Canada Revenue Agency's Review and Analysis Division, which confirm long-standing concerns that Muslim-led charities have been disproportionately impacted by Canada's counter-terrorism financing framework. The report identifies structural and methodological deficiencies that have resulted in audits lacking credible risk indicators, creating material, reputational, and operational harms for affected organizations and undermining trust between Muslim communities and public institutions. These findings underscore the need for reforms that strengthen oversight, ensure Charter-compliant practices, and protect Muslim charities while preserving the integrity of Canada's national security framework.

Recommendations:

- Implement all NSIRA recommendations in full, including the collection of demographic data, validation of risk indicators, and rigorous documentation of decision-making.
- Revise and revamp the National Inherent Risk Assessment (NIRA) methodology by applying FATF's functional definition of NPOs, basing risk ratings on demonstrable evidence of terrorist financing vulnerability, integrating sector-led compliance measures into risk calculations, and shifting from an "inherent risk" framework to an evidence-based residual-risk assessment.
- Suspend the use of RAD's audit powers until reforms are enacted that ensure impartiality and protect against discriminatory practices.
- Establish independent oversight of the CRA's national security functions, with accountability mechanisms accessible to Parliament and civil society.
- Engage in structured consultations with Muslim civil society organizations and other affected communities to restore confidence in the charitable sector's regulatory framework.