



CANADIAN MUSLIM
PUBLIC AFFAIRS
COUNCIL

CMPAC POLICY BRIEF

JULY 2026



CMPAC Policy Brief: July 2026

EXECUTIVE SUMMARY

Recent immigration, legislative, foreign policy, national security, and public safety developments have significant implications for constitutional governance, Canada's humanitarian commitments, and the rights of Canadian Muslim communities. Across these policy areas, there is a consistent need to ensure that federal action remains aligned with the Canadian Charter of Rights and Freedoms, international law, and principles of equality, accountability, procedural fairness, and non-discrimination.

Recent developments within Canada's immigration system have raised serious concerns regarding procedural fairness, transparency, humanitarian protection, and ministerial accountability. Changes affecting refugee eligibility, temporary resident pathways, family reunification, international students, visitor visas, and humanitarian programs indicate an increasingly restrictive policy direction. These measures have particular consequences for people fleeing conflict and persecution in Muslim-majority countries, as well as Canadian Muslim families, civil society organizations, students, and humanitarian advocates attempting to support them.

CMPAC is particularly concerned about inconsistent decision-making within Immigration, Refugees and Citizenship Canada, limited engagement with affected communities, prolonged processing delays, high refusal rates, and the continued failure of humanitarian pathways to respond effectively to urgent crises. Bill C-12 further raises concerns about expanded refugee claim ineligibility and the movement away from individualized assessment. Taken together, these developments have contributed to declining public confidence in the fairness, predictability, and humanitarian integrity of Canada's immigration system.

The ongoing implementation challenges associated with the Gaza Temporary Resident Visa Family Reunification Program remain a significant humanitarian concern. Families continue to face prolonged processing delays, impractical documentation and biometric requirements, limited transparency, and continued separation despite the urgent circumstances facing applicants. Similarly, Palestinian students and scholars accepted to Canadian post-secondary institutions continue to experience delays obtaining study permits, resulting in lost educational opportunities and prolonged uncertainty. These shortcomings demonstrate the need for more effective humanitarian pathways capable of responding rapidly during international crises.

Bill C-9, the Combatting Hate Act, has now received Royal Assent. CMPAC remains concerned about the legislation's potential impact on Charter-protected freedoms, including freedom of expression, religion, association, and peaceful assembly. These concerns are compounded by



the limited consultation with affected communities during the legislative process. As implementation begins, transparent reporting, meaningful community engagement, and sustained parliamentary oversight will be necessary to identify and address unintended consequences.

Bill C-22, the Lawful Access Act, has passed Third Reading in the House of Commons and has been referred to the Senate. The bill proposes a significant expansion of Canada's digital surveillance and lawful access framework. CMPAC remains concerned about the breadth of the proposed authorities, lowered thresholds for accessing personal information, the use of secret orders, and the absence of sufficiently robust oversight and accountability mechanisms. Without substantial amendments, the legislation risks weakening privacy protections and disproportionately affecting Muslim, racialized, immigrant, and refugee communities.

Bill C-34, the Safe Social Media Act, also raises concerns regarding the expansion of terrorism and violent extremism definitions beyond existing Criminal Code standards and the potential impact on lawful online expression. CMPAC is particularly concerned that broad content moderation obligations and insufficient safeguards could disproportionately affect Canadian Muslim communities, whose civic participation has historically been subject to heightened scrutiny under national security frameworks.

Furthermore, CMPAC encourages Canada to adopt a long-term approach to Gaza's reconstruction by supporting sustainable recovery, rebuilding essential civilian infrastructure, strengthening humanitarian assistance, promoting unhindered humanitarian access, and working with trusted international, local, and Canadian humanitarian partners in accordance with international law.

Together, these immigration, legislative, digital governance, and foreign policy developments demonstrate the importance of principled federal leadership that safeguards constitutional freedoms, protects humanitarian commitments, strengthens institutional accountability, and upholds international law. Canada's immigration, national security, public safety, digital policy, and foreign policy frameworks must remain consistent with the rule of law, human rights, equality, and public trust.



KEY ISSUES AND RECOMMENDATIONS

1. Immigration Policy and Ministerial Accountability

a. Growing Concerns Regarding the Administration of Canada's Immigration System

CMPAC is increasingly concerned about the administration and policy direction of Immigration, Refugees and Citizenship Canada. Recent decisions affecting refugees, temporary residents, international students, family reunification applicants, visitor visa applicants, and humanitarian pathways suggest that the challenges within Canada's immigration system are not limited to processing backlogs or isolated administrative errors.

The combined effect of recent policies has been an immigration system that is becoming more restrictive, less predictable, and increasingly difficult for affected individuals and civil society organizations to navigate. Concerns include inconsistent decision-making, high refusal rates, limited transparency regarding the reasons for refusals, prolonged processing delays, and the absence of meaningful engagement with communities directly affected by immigration policy.

These concerns are particularly significant for Muslim communities. Many Canadian Muslims have immediate family members, community partners, students, scholars, or humanitarian contacts in regions experiencing war, occupation, authoritarianism, and displacement. Immigration decisions therefore have direct consequences for family unity, access to safety, education, humanitarian protection, and community participation. Furthermore, Muslim community family members applying from specific countries face systemic discrimination through additional security measures and profiling.

CMPAC is also concerned about declining confidence in the leadership and accountability of the immigration portfolio. When humanitarian programs repeatedly fail to meet their stated objectives, applications remain unresolved for extended periods, and civil society organizations are unable to obtain clear answers from the department, ministerial accountability becomes a central policy issue.

Recommendations:

- The Prime Minister should undertake an independent review of the administration and policy direction of Immigration, Refugees and Citizenship Canada to assess whether current policies are consistent with Canada's humanitarian commitments, procedural fairness obligations, and public service standards.



- The Government of Canada should restore regular, structured engagement between IRCC and civil society organizations, refugee-serving agencies, settlement organizations, faith communities, and immigration practitioners to ensure that policy development reflects the experiences of affected communities.
- IRCC should improve transparency by publishing clearer information regarding application processing times, refusal trends, operational guidance, and departmental performance indicators.
- IRCC should strengthen accountability mechanisms by providing regular public reporting on humanitarian programs, temporary resident pathways, refugee processing, and family reunification initiatives.
- The Prime Minister should restore public confidence in Canada's immigration system through appointing new leadership that prioritizes fairness, consistency, transparency, and humanitarian protection.

b. Bill C-12 and Access to Refugee Protection

The implementation of Bill C-12 raises serious concerns regarding access to Canada's refugee determination system. Provisions that expand refugee claim ineligibility or create additional procedural barriers risk preventing individuals from receiving a full and individualized assessment of their need for protection.

Refugee eligibility decisions must not be based primarily on broad administrative categories or the timing and manner in which a person entered Canada. Individuals fleeing persecution, conflict, political repression, or state violence may face significant barriers obtaining documents, travelling through regular channels, or immediately initiating a refugee claim.

These concerns are particularly relevant to individuals displaced from Afghanistan, Sudan, Syria, Yemen, Palestine, and other regions where Muslims are experiencing armed conflict, political instability, and persecution. Canada must not respond to administrative pressures by weakening access to refugee protection or shifting away from individualized decision-making.

Recommendations:

- Refugee eligibility provisions should remain consistent with Canada's obligations under the Canadian Charter of Rights and Freedoms, the 1951 Refugee Convention, and other international human rights commitments.
- The Government should conduct comprehensive consultations with refugee-serving organizations, legal experts, humanitarian organizations, and affected communities before implementing significant changes to Canada's refugee protection framework.
- Parliament should establish a formal review of the legislation following implementation to assess its impact on access to protection, procedural fairness, and vulnerable populations.



c. Humanitarian Pathways and Family Reunification

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.

Palestinian students and scholars accepted by Canadian institutions have similarly encountered prolonged study-permit delays. These barriers have resulted in lost academic terms, deferred admissions, and the possible loss of educational opportunities. Canada's immigration system must be capable of responding more effectively when students and scholars are displaced by conflict.

Recommendations:

- 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.

2. Legislative Concerns and Recommendations

a. Bill C-9: *The Combatting Hate Act*

Bill C-9, the Combatting Hate Act, has now received Royal Assent. As the legislation enters the implementation stage, CMPAC remains concerned about both its substance and the process through which it was enacted. Throughout its consideration, civil liberties organizations, faith communities, legal experts, and affected Canadians consistently raised concerns regarding the bill's implications for Charter-protected freedoms and the lack of meaningful consultation with impacted communities.

CMPAC's analysis concluded that several provisions may have unintended consequences for lawful expression, peaceful assembly, religious practice, and political advocacy. These concerns remain particularly relevant for Muslim communities, whose organizations and representatives consistently warned that aspects of the legislation could disproportionately affect religious expression, community institutions, advocacy, and civic participation.



Bill C-9 should also be understood within a broader legislative trend involving expanded state powers and increasing restrictions affecting the exercise of Charter-protected rights and freedoms. With the legislative process now complete, attention must shift toward ensuring that the Act is implemented in a manner that is transparent, proportionate, and fully consistent with the Canadian Charter of Rights and Freedoms. Ongoing oversight, public reporting, and meaningful engagement with affected communities will be essential to identifying unintended consequences and maintaining public confidence.

Recommendations:

- The Government of Canada should ensure that the implementation and enforcement of Bill C-9 fully respect the Canadian Charter of Rights and Freedoms, particularly the freedoms of expression, association, religion, and peaceful assembly.
- The Department of Justice should establish a structured post-implementation consultation process involving civil liberties organizations, legal experts, faith communities, and affected stakeholders to assess the practical impacts of the legislation and identify areas requiring clarification or legislative amendment.
- The Department of Justice should publish regular public reporting on the use of Bill C-9's provisions, including data on investigations, charges, prosecutions, and enforcement trends, to promote transparency, accountability, and evidence-based policy evaluation.
- Parliament should undertake a comprehensive statutory review of Bill C-9 following a reasonable implementation period to evaluate its effectiveness, assess its impacts on Charter rights and affected communities, and consider amendments where unintended consequences are identified.
- Civil liberties organizations, faith communities, legal experts, and affected Canadians remain actively engaged in monitoring the implementation of Bill C-9 to help ensure that efforts to combat hate are pursued in a manner consistent with constitutional protections, democratic accountability, and fundamental freedoms.

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

Bill C-22 has passed third reading in the House of Commons and will now be referred to the Senate for consideration. The bill proposes a significant expansion of Canada's lawful access and digital surveillance authorities, with implications for privacy rights, due process, and Charter protections. CMPAC remains concerned that the legislation expands state access to personal information while providing insufficient safeguards, oversight, and accountability mechanisms.

In its current form, the bill raises concerns regarding the breadth of data access powers, the threshold for authorization, and the potential impact on Charter-protected rights and freedoms. Without stronger safeguards, these measures risk normalizing intrusive surveillance practices



and disproportionately affecting marginalized and racialized communities, including Canadian Muslims.

Recommendations:

- The Senate 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 Senate should consider amendments that strengthen judicial authorization requirements, independent oversight, transparency obligations, and accountability mechanisms.
- The senate should initiate structured consultations with civil liberties organizations, legal experts, technology specialists, and affected communities to identify amendments that appropriately balance public safety objectives with privacy rights and fundamental freedoms.
- CMPAC will continue to monitor the bill's progress through the Senate and advocate for amendments that safeguard privacy, due process, and Charter-protected rights.

c. Bill C-34, the *Safe Social Media Act*

CMPAC recognizes the importance of protecting Canadians from genuine online harms and supports efforts to improve accountability for social media platforms and digital services. However, these objectives must be pursued in a manner that remains consistent with the Canadian Charter of Rights and Freedoms, established principles of criminal law, and Canada's commitment to protecting lawful expression and civic participation.

CMPAC is concerned that [Bill C-34](#) expands Canada's legal framework surrounding terrorism and violent extremism beyond existing Criminal Code definitions while requiring online platforms to identify and remove a broader range of content. Without clearer legal definitions and stronger safeguards, these provisions risk encouraging the over-removal of lawful expression and creating uncertainty for political advocacy, journalism, academic discussion, religious expression, and human rights advocacy.

These concerns are particularly significant for Canadian Muslim communities, which have historically experienced heightened surveillance, profiling, and scrutiny under Canada's post-9/11 national security framework. Broad and vaguely defined terrorism and violent extremism provisions risk disproportionately affecting lawful civic participation and public discourse, particularly on issues relating to international conflicts and human rights. CMPAC is also concerned that the bill provides insufficient protection for lawful advocacy, protest, and dissent while placing complex legal determinations in the hands of private technology companies, creating incentives to remove lawful content to avoid regulatory penalties.



Recommendations:

- Amend Bill C-34 to ensure terrorism and violent extremism definitions remain consistent with the Criminal Code and are sufficiently precise to protect lawful expression.
- Strengthen explicit protections for lawful advocacy, protest, dissent, journalism, academic research, religious expression, and human rights advocacy.
- Establish stronger independent oversight and transparency requirements for content moderation decisions.
- Create an ongoing consultation process with Muslim organizations, civil liberties organizations, digital rights experts, and affected communities throughout the implementation and future review of the legislation.

3. Recommendations Related to Palestine Policy Development and Reconstruction 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.