



CANADIAN MUSLIM
PUBLIC AFFAIRS
COUNCIL

CMPAC POLICY BRIEF

JUNE 2026



CMPAC Policy Brief: June 2026

EXECUTIVE SUMMARY

Recent legislative, foreign policy, national security, and public safety developments have significant implications for constitutional governance, humanitarian commitments, and the rights and freedoms of Canadian Muslim communities. Across multiple policy domains, there is a continuing need to ensure that government action remains consistent with the Canadian Charter of Rights and Freedoms, international humanitarian law, and principles of accountability, equality, and non-discrimination.

Bill C-9, the Combatting Hate Act, has now received Royal Assent. While the objective of addressing hate-motivated violence is important, concerns remain regarding several provisions of the legislation and the process through which it was enacted. Civil liberties organizations, legal experts, faith communities, and affected Canadians have raised concerns regarding potential impacts on freedoms of expression, religion, association, and peaceful assembly. As implementation begins, ongoing monitoring, transparency, and review will be necessary to ensure the legislation is applied in a manner consistent with Charter protections and democratic principles.

Similarly, Bill C-22, the Lawful Access Act, has passed Third Reading in the House of Commons and is now before the Senate. The bill proposes significant expansions to Canada's lawful access and digital surveillance framework. While intended to strengthen public safety and investigative capacity, concerns remain regarding privacy protections, the scope of state access to personal information, and the adequacy of judicial oversight and accountability mechanisms. Without stronger safeguards, these measures risk undermining Charter-protected rights and disproportionately affecting marginalized and racialized communities.

Canada's engagement with Gaza must extend beyond emergency humanitarian assistance toward a coordinated, long-term reconstruction and recovery strategy. The destruction of critical civilian infrastructure, healthcare institutions, and education systems requires sustained international support and investment. At the same time, the Gaza Temporary Resident Visa Family Reunification Program continues to face significant implementation challenges, including processing delays, barriers to family reunification, and obstacles affecting Palestinian students admitted to Canadian institutions. A more effective and rights-based approach is required to ensure that Canada's humanitarian commitments are realized in practice.

In addition, findings by the National Security and Intelligence Review Agency have reinforced longstanding concerns regarding the treatment of Muslim-led charities under Canada's counter-terrorism financing framework. Structural deficiencies within existing regulatory and



audit processes have contributed to disproportionate scrutiny, operational harms, and declining trust between Muslim communities and public institutions. Meaningful reforms, stronger oversight, and evidence-based risk assessment mechanisms are necessary to ensure regulatory practices remain fair, transparent, and Charter-compliant.

Taken together, these developments demonstrate the importance of principled federal leadership that protects constitutional freedoms, strengthens institutional accountability, upholds Canada's humanitarian commitments, and addresses systemic barriers affecting Canadian Muslim communities. Government policy must remain consistent with the rule of law, human rights obligations, and the fundamental rights and freedoms guaranteed to all Canadians.

KEY ISSUES AND RECOMMENDATIONS

1. 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 Canada 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 Canada 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 should 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 Government 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.

2. Recommendations Related to Palestine Policy

a. 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.

b. 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.

3. Combatting Anti-Muslim Hate, Violence and Structural Islamophobia

a. 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.
- 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.

b. Combatting Islamophobia and Protecting Muslim Communities in Canada

Islamophobia continues to pose a significant challenge to social cohesion, public safety, and the full participation of Muslim communities in Canadian society. Despite growing recognition of anti-Muslim discrimination and hate, Canadian Muslims continue to experience disproportionate levels of harassment, threats, vandalism, and violence targeting individuals, mosques, schools, and community institutions. Addressing Islamophobia requires a comprehensive and coordinated approach that goes beyond reactive measures and focuses on prevention, protection, education, and accountability.

As outlined in [CMPAC's Islamophobia Policy Handbook](#), governments at all levels must adopt a coordinated, evidence-based approach to addressing both the immediate impacts of anti-Muslim hate and the broader structural factors that enable Islamophobia to persist. Protecting Muslim communities requires sustained investments in community safety, stronger public policy responses, and meaningful engagement with affected communities.

Recommendations

- The Government of Canada should expand and strengthen security funding available to mosques, Islamic centres, Islamic schools, and Muslim community organizations identified as vulnerable to hate-motivated incidents and violence.
- Public Safety Canada should develop a national strategy to prevent and respond to Islamophobia, including measures to address hate crimes, online hate, threats against places of worship, and community safety concerns.
- Law enforcement agencies should strengthen protocols for identifying, investigating, tracking, and reporting incidents of anti-Muslim hate and discrimination.
- The Government of Canada should establish regular and structured engagement mechanisms with Muslim organizations to identify emerging challenges, assess risks, and develop community-informed policy responses.
- The federal government should commit to measurable outcomes and public reporting on efforts to combat Islamophobia, improve community safety, and address barriers faced by Muslim communities across Canada.