



CANADIAN MUSLIM
PUBLIC AFFAIRS
COUNCIL

CMPAC POLICY BRIEF

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CMPAC Policy Brief: September 2026

Introduction

This brief highlights the policy concerns impacting the Muslim community for the month of September. It presents policy concerns along with recommendations that suggest policy changes and corrective actions. We hope that members of parliament take these policy concerns and recommendations into consideration as they deliberate in this new session of parliament.

Executive Summary

Developments across immigration, national security, public safety, digital governance, and foreign policy continue to carry important implications for constitutional rights, Canada's humanitarian obligations, and Canadian Muslim communities. Federal policy in these areas must remain grounded in the Canadian Charter of Rights and Freedoms, international law, and the principles of equality, accountability, procedural fairness, and non-discrimination.

The direction of Canada's immigration system continues to generate concerns regarding transparency, procedural fairness, humanitarian protection, and ministerial accountability. Policies affecting temporary resident pathways, family reunification, international students, visitor visas, and humanitarian programs reflect an increasingly restrictive approach. Concerns also persist regarding inconsistent decision-making within Immigration, Refugees and Citizenship Canada, insufficient engagement with affected communities, lengthy processing times, high refusal rates, and humanitarian pathways that have struggled to respond effectively to urgent crises. The Gaza Temporary Resident Visa Family Reunification Program continues to present serious humanitarian challenges, where applicants face lengthy processing delays, impractical documentation and biometric requirements, insufficient transparency, and prolonged family separation, while Palestinian students continue to face barriers in securing study permits.

Bill C-22, the Lawful Access Act, remains a significant concern as it proceeds through Parliament, as it would substantially expand Canada's digital surveillance and lawful access framework and raise questions regarding privacy, due process, oversight, and accountability without meaningful amendments and stronger safeguards. Bill C-34, the Safe Social Media Act, similarly warrants continued scrutiny because its approach to terrorism and violent extremism extends beyond existing Criminal Code standards and risks disproportionately affecting Canadian Muslim communities whose civic and political participation has historically been subject to heightened scrutiny.

Canada's approach to Gaza and Syria must extend beyond immediate humanitarian relief toward sustained recovery and reconstruction. This should include support for rebuilding essential civilian infrastructure, strengthening humanitarian assistance, ensuring unhindered humanitarian access, lifting restrictive economic sanctions on Syria, and working with trusted international, local, and Canadian humanitarian partners firmly grounded in international law. Across all these policy areas, the need for principled and accountable federal leadership remains clear to protect constitutional freedoms, uphold international obligations, strengthen institutional accountability, and maintain public confidence.

Key Issues and Recommendations

1. Immigration Policy and Ministerial Accountability

a. Concerns regarding the administration of Canada's immigration system

Concerns regarding the administration and overall policy direction of Immigration, Refugees and Citizenship Canada (IRCC) continue to highlight broad, structural challenges within the federal immigration portfolio. Policy decisions affecting refugees, temporary residents, international students, family reunification applicants, visitor visa applicants, and humanitarian pathways indicate systemic problems that extend far beyond simple administrative backlogs or localized processing delays.

The cumulative impact of recent departmental decisions has been the creation of an immigration framework that is increasingly restrictive, and difficult for applicants, legal practitioners, and civil society organizations to navigate. These administrative barriers carry severe personal, social, and economic consequences for Canadian Muslim communities. Many Canadian Muslims maintain direct ties with family members, scholars, students, and community partners in regions suffering from active military conflict, authoritarian governance, foreign occupation, and systemic displacement. Restrictive or arbitrary immigration decisions directly impair family reunification, access to safety, higher education, and broader civic participation.

The applicants applying from specific Muslim-majority countries continue to encounter systemic barriers. prolonged security vetting, and discriminatory profiling throughout the adjudication process. When humanitarian programs repeatedly fail to achieve their stated policy objectives, applications remain unresolved for prolonged periods, and civil society organizations are unable to obtain clear or timely answers from departmental leadership, ministerial accountability and systemic governance become central policy issues. Restoring public confidence requires transparent operations, published performance metrics, and a leadership approach centered on fairness and human rights.

Recommendations:

- The Prime Minister should undertake an independent review of the management 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

b. Humanitarian Pathways, Family Reunification and Students Visas

Nearly two years following its initial announcement, the Gaza Temporary Resident Visa (TRV) Family Reunification Program continues to fall drastically short of its stated humanitarian objectives. Fewer than 970 individuals have successfully arrived in Canada, largely through self-arranged and dangerous evacuations, while an estimated 500 approved or pending applicants have died while waiting for processing in active war zones.

At the same time, Palestinian students and scholars accepted into accredited Canadian post-secondary institutions face severe, unexplained delays in study permit issuance. These bureaucratic delays have forced students to forfeit earned admissions, miss critical academic terms, lose funded scholarships, and experience the collapse of their educational and professional futures.

These ongoing failures highlight the extreme inflexibility of Canada's current humanitarian mechanisms during active international crises. Insisting on standard, highly complex biometric collection, document verification, and security screening rules within active conflict zones creates insurmountable barriers that prevent timely evacuation and keep families dangerously separated. IRCC must adopt pragmatic, emergency-oriented protocols that prioritize human life, simplify documentation requirements, ensure full family unity at the border, and honor Canada's explicit humanitarian commitments.

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 Digital Policy

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

Bill C-22, currently under consideration in the Senate after passing Third Reading in the House of Commons, represents a broad and concerning expansion of Canada's digital surveillance and lawful access framework. The bill expands state capabilities to compel access to personal electronic data and subscriber information while lowering standard judicial authorization thresholds and providing minimal independent oversight.

Expanding digital surveillance authorities without strict judicial authorization standards creates substantial constitutional risks under Sections 2, 7, and 8 of the Canadian Charter of Rights and Freedoms. Lowering the legal thresholds for state access to private communication data threatens to normalize intrusive state monitoring practices.

These expanded authorities pose heightened risks for Muslim, racialized, immigrant, and refugee communities, who have historically been subjected to disproportionate scrutiny and intelligence gathering under national security frameworks. The Senate must pause the bill's advancement to conduct a comprehensive constitutional review, consult civil liberties and technology experts, and introduce robust statutory safeguards to protect digital privacy rights and due process.

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.

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

While protecting Canadians from online harms and holding digital platforms accountable is a valid policy objective, Bill C-34 introduces serious risks to civil liberties by expanding definitions of terrorism and violent extremism beyond established Criminal Code standards. By placing broad, poorly defined content-moderation obligations on private technology platforms, the bill incentivizes platforms to aggressively remove lawful content to avoid regulatory penalties and liability.

This broad, automated moderation model creates significant risks for political advocacy, human rights reporting, academic research, religious commentary, and independent journalism. Given that Canadian Muslim civic participation has historically faced heightened surveillance and

mischaracterization under security frameworks, broad content moderation mandates risk censoring lawful discourse surrounding international human rights, foreign policy, and Palestinian rights.

Placing complex legal determinations regarding speech into the hands of private social media corporations without strong independent oversight or clear legal definitions undermines democratic discourse. Explicit legal protections for lawful dissent, protest, academic research, and religious expression are urgently required.

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 and Syria Policy

Development and Reconstruction of Gaza and Syria

Canada's foreign policy approach in conflict-affected regions like Gaza and Syria must transition away from short-term emergency aid toward long-term recovery, economic sustainability, and structural reconstruction. In Gaza, the total destruction of critical civilian infrastructure, including hospitals, clinics, schools, universities, municipal water networks, and housing stock, demands a dedicated, highly structured international recovery strategy.

A meaningful Canadian contribution must extend beyond emergency relief to invest directly in health-sector capacity building, support local educational and health institutions, and maintain firm diplomatic pressure to lift the blockade on Gaza to permit unhindered, sustained humanitarian and material access.

In Syria, long-term civilian rehabilitation, healthcare restoration, and economic recovery remain severely limited by sweeping international sanctions regimes. Canada should review and lift remaining sanctions that unnecessarily impede humanitarian assistance, economic recovery, and the reconstruction of basic public infrastructure.

Facilitating legitimate economic, humanitarian, and development activity enables affected local populations to rebuild essential services and restore community livelihoods. Coordinating Canadian assistance with trusted multilateral partners, local community organizations, and experienced Canadian development NGOs will ensure recovery efforts are effective, sustainable, and strictly aligned with local needs.

Recommendations:

- Establish comprehensive, long-term recovery and reconstruction strategies for Gaza and Syria that extend beyond emergency humanitarian assistance.
- Coordinate Canadian assistance with trusted multilateral institutions, local partners, and Canadian humanitarian and development organizations with experience in Gaza and Syria to improve effectiveness, local responsiveness, and sustainability.
- Support the rebuilding of essential civilian infrastructure and services, including healthcare, education, housing, water, and other critical systems.
- Advocate for the lifting of the blockade on Gaza and secure sustained, unhindered humanitarian access necessary for humanitarian assistance, recovery, and reconstruction.
- Invest in rebuilding and strengthening Gaza's healthcare system, with dedicated support for health-sector capacity building, including healthcare institutions, local health professionals, medical education and training, and the long-term delivery of essential health services.
- Review and lift remaining Canadian sanctions on Syria that unnecessarily impede humanitarian assistance, reconstruction, economic recovery, and the restoration of essential civilian infrastructure and services.
- Promote community-driven economic recovery, education, livelihoods, and local capacity-building initiatives that enable affected communities to participate meaningfully in reconstruction and long-term development.