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Recommendations to the House of Commons Standing Committee on Procedure and House Affairs for its Review of Bill C-25, An Act to Amend the *Canada Elections Act*

(May 26, 2026)

A. Amendments to [Bill C-25](#) to help stop disinformation, undemocratic third-party influence and foreign interference, and close information gaps

1. Prohibit all false claims during elections

Recommendation 1:

Add to proposed new section 482.01 of the *CEA*, which is proposed to be added to the *CEA* by section 51 of Bill C-25, the following simple measure to prohibit everyone and every entity from making any false claims during a pre-election or election period:

482.01(1)

(h) anything related to the election.

Recommendation 2:

As the [CEO and Commissioner of Canada Elections \(CCE\) both called for in 2018](#), to ensure the prohibitions on false claims are actually effective and enforceable, change the words “with the intention of affecting the results” and “with the intention of affecting the results or disrupting the conduct of an election” to “during a pre-election period or election period” in every provision in Bill C-25 that includes those words, and in every provision in the *CEA* that already includes those words. Both the CEO and CCE testified in 2018 that proving intent will be very difficult and, as a result, provisions requiring proof of intent are essentially unenforceable.

Recommendation 3:

Also to clearly prohibit all false claims, add to section 9 of Bill C-25 a provision that amends subsection 282.8(b) of the *CEA*, which states:

“Intimidation, etc.

282.8. Every person is guilty of an offence who ...

(b) by any pretence or contrivance, including by representing that the ballot or the manner of voting at an election is not secret, induces a person to vote or refrain from voting or to vote or refrain from voting for a particular candidate at an election.”

to change “by any pretence or contrivance...” to

“by any pretence, contrivance or false claim or statement made in any manner or medium or place no matter how it is made, distributed, transmitted or published....”

And make the same wording change in proposed new subsection 362.4(b) of the *CEA* (which is added by section 25 of Bill C-25),

Recommendation 4:

As the CEO proposed in recommendations 2.2 and 2.3 in his November 2024 report [*Protecting Against Threats to the Electoral Process*](#), extend all the prohibitions on false claims in the *CEA*, including the recommended changes set out above (and, as also recommended by the CEO in recommendations 2.9 to 2.11 in his report, also extend other related *CEA* provisions), to apply also to nomination contests and party leadership contests and between election policy-making processes, and again do not require proof of intent to affect the results or disrupt any of the processes.

Recommendation 5:

Given it is relatively easy and inexpensive to establish a survey company that uses very questionable online survey techniques that are not statistically valid, and to promote survey results on social media and Internet sites and with media releases to try to influence voters, the past provision in the *CEA* should be re-enacted to prohibit survey results from being transmitted just before election day to prevent voters from being misled as they go to vote.

2. Prohibit foreign influence activities that are currently legal

Recommendation 6:

To clearly prohibit foreign influence activities that are currently allowed under the *CEA*, amend section 8 of Bill C-25 (which amends section 282.4 of the *CEA*) to add the following measures:

- Add a subsection to section 8 of Bill C-25 that says “Paragraph 282.4(2)(a) and subsection 282.4(3) of the *CEA* are repealed”;

- Add a subsection to section 282.4 that says “No person, government or entity shall attempt to do anything prohibited by section 282.4.”

And, given they contain the same wording as paragraph 282.4(2)(a) and subsection 282.4(3) of the *CEA* that creates loopholes that allow for foreign interference, delete proposed new paragraph 362.2(2)(a) and subsection 362.2(3) from section 25 of Bill C-25.

3. Do not make fundraising events more secretive, make them more transparent

Recommendation 7:

Delete sections 28-29 of Bill C-25 as they delete section 384.2 of the *CEA* and change subsection 384.3(13) of the *CEA* in ways that make it essentially impossible to determine who exactly is organizing and/or holding a fundraising event for a nomination contestant, leadership contestant, party, riding association or candidate, which is a recipe for corruption, waste of the public's money and other abuses. Sections 28-29 of Bill C-25 remove the requirement to give advance notice of the event, and after the event change the requirement to disclose the location of the event from the actual event address to the municipality where the event is held.

Recommendation 8:

And delete section 30 of Bill C-25 as it repeals section 384.4 of the *CEA*, which will allow a contestant, party, riding association or candidate to keep donations made at a fundraising event even if they fail to provide the Chief Electoral Officer with the event report as required in section 384.3 of the *CEA*.

Recommendation 9:

Replace sections 28-30 of Bill C-25 with a comprehensive requirement to prevent corruption and unethical trading of favours between politicians and people who raise money and do other favours for parties, riding associations and candidates, by requiring public disclosure of everyone involved in any fundraising or campaigning activity or any other assistance provided, including everyone involved in organizing and hosting every fundraising and campaign event, and the exact location of every event.

4. Make third-party rules transparent, democratic and ethical, in part to help stop foreign interference

Recommendation 10:

To ensure third-party spending limits are democratic and based on actual voter support, limit individuals who are third parties to spending only an amount during a pre-election period or election period that reflects the fact that they only represent one voter, and prohibit businesses from spending as third parties, by amending sections 19 and 23 of Bill C-25, which add sections 349.95 and 358 to the *CEA*, to change proposed new subsections 349.95(5) and 358(5) by adding at the end of each of those subsections the following:

“, and a third party who is an individual is prohibited from spending more than \$100, and a third party that is a business is prohibited from spending any money, on third party advertising, activities, surveys or expenses as defined in section 349.”

Recommendation 11:

To ensure third-party spending limits are democratic and based on actual voter support, change the spending limits in the *CEA* for third parties that are citizen organizations so that the limits for each organization are based on the actual number of voters who are members or supporters of the organization. The spending limits should be closer to the amounts that candidates and parties are allowed to spend than the current limits are, given it is entirely democratically valid for voters to choose to express themselves politically through supporting a third party instead of a candidate or party.

Recommendation 12:

To ensure that third parties are effectively required to only use contributions from Canadians to pay for their third party activities, amend sections 19 and 23 of the Bill C-25 to change proposed new *CEA* subsections 349.95(2) and 358(2) by replacing the words “if the total amount of contributions received, from all sources and for any purpose, by the third party during the previous year is equal to or less than 10% of its revenue for that year,” with the following:

“if the third party did not receive any contributions and did not since sell a good or service at an inflated rate in order to obscure a contribution (which is prohibited) since the previous election day, or since it was first established,”.

Recommendation 13:

To ensure and require that government grants and contributions are counted in the calculation of whether more than 10% of a third party's

revenues come from contributions, amend sections 19 and 23 of the Bill C-25 to delete proposed new *CEA* subsections 349.95(3) and 358(3).

Recommendation 14:

All the registration, disclosure and spending limits in the *CEA* that apply to third parties during pre-election and election periods should be extended to apply during nomination contests and party leadership contests, with businesses prohibited from spending, individuals only allowed to spend at most \$100, and citizen organizations allowed to spend a maximum of a percentage of whatever the spending limit is for the contestants, with the actual limit for each citizen organization determined by the actual number of voters who are members or supporters of the organization, and third parties should be prohibited from colluding and coordinating their activities with contestants (as they are prohibited from colluding and coordinating with election candidates, EDAs and parties).

Recommendation 15:

The definitions of “election survey” and “election survey expense” in section 349 of the *CEA* should be changed so that third parties that are citizen organizations, including unions, should not be required to count the costs of surveying their own members/supporters as a survey expense.

Recommendation 16:

As proposed in the recommendations set out above, all third parties should be limited to spending an amount based on their actual voter support, with businesses prohibited from spending because they don't represent any voters. And, as the financial returns filed by third parties with Elections Canada for the 43rd federal election, and 44th election, both show clearly ([click here to see](#) the returns for the 43rd and [click here](#) for the 44th) third parties should be prohibited from transferring funds to other third parties as that allows for front groups to be created across the political spectrum that mislead voters during an election concerning who the “front” third party actually represents. See more details in Part B further below.

4. Prohibit foreigners and people under age 18 from voting in nomination and party leadership contests

Recommendation 17:

As the CEO proposes in recommendations 2.7 and 2.8 in his November 2024 report [Protecting Against Threats to the Electoral Process](#), add after subsection 7(2) of Bill C-25 the following:

7 (3) Subsections 281.3(a) and (b) of the *CEA* are both amended by changing the words “an election” to “a nomination contest, leadership contest or an election”

7 (4) Subsection (c) is added after subsection 281.3(b) and reads as follows:

(c) Political parties are required to obtain a declaration from any who votes in a nomination contest or leadership contest that they are a Canadian citizen, and are required to create, maintain and submit to the Chief Electoral Officer a list of the declarations of everyone who votes in a contest.

5. Mandate Elections Canada to do reports on costs of informing voters, operating parties, and electoral reform

Recommendation 18:

To provide the answers to key questions that are needed to set, finally, realistic donation, loan and spending limits (and possibly public funding) for nomination contestants, election candidates, parties, party leadership contestants and third parties, amend Bill C-25 to add section 83.1 that reads as follows:

83.1 (1) The Chief Electoral Officer must make a report to the Speaker of the House of Commons by the next federal election on the actual cost of informing voters.

(2) Before making the report, the Chief Electoral Officer must undertake a meaningful, substantive consultation with the Advisory Committee of Political Parties, established by subsection 21.1(1) of the *Canada Elections Act*, and with contestants, candidates and third parties, and experts in contestants, candidates, parties and third parties, voter communications, telecommunications, advertising, social media and the Internet.

Recommendation 19:

To provide the answers to key questions that are needed to set, finally, realistic donation and loan limits (and possibly public funding) for EDAs and parties, amend Bill C-65 to add section 83.2 that reads as follows:

83.2 (1) The Chief Electoral Officer must make a report to the Speaker of the House of Commons by the next federal election on the actual annual cost of operating a political party and electoral district association (EDA) during an election year, and during a year between elections.

(2) Before making the report, the Chief Electoral Officer must undertake a meaningful, substantive consultation with the Advisory Committee of Political Parties, established by subsection 21.1(1) of the *Canada Elections Act*, and with experts in parties, EDAs, election and by-election campaigns.

Recommendation 20:

To, finally, have a meaningful study completed on electoral voting system reform, amend Bill C-65 to add section 83.3 that reads as follows:

83.3 (1) The Chief Electoral Officer must make a report to the Speaker of the House of Commons by the end of the calendar year that follows the year in which the next federal election is held on the benefits and negative impacts of Canada's current electoral voting system, and the benefits and negative impacts of various options for reforming the voting system.

(2) Before making the report, the Chief Electoral Officer must undertake a meaningful, substantive consultation with the Advisory Committee of Political Parties, established by subsection 21.1(1) of the *Canada Elections Act*, and with the public, and with contestants, candidates and third parties, and with experts in voting systems and comparisons of the benefits and negative impacts of various voting systems around the world.

B. Many more changes needed to prevent, prohibit and penalize disinformation, undemocratic third-party influence and foreign interference

Committee members can see details about the above recommendations in Democracy Watch's submission to this Committee in February 2026 for its study on Foreign Election Interference. [Click here to see](#) the English version on the Committee's website, and [click here to see](#) the French version on the Committee's website.

Committee members can also see a summary list of the above changes, and many other changes, 20 overall changes in total, in Democracy Watch's October 2023 submission to the Standing Committee on Access to Information, Privacy and Ethics concerning its study of Foreign Interference and the Threats to the Integrity of Democratic Institutions, Intellectual Property and the Canadian State. [Click here to see](#) the English version on the Committee's website, and [click here to see the French version](#) of the submission on the Committee's website (as translated for the Ethics Committee by the House of Commons translation service).

Democracy Watch's Co-founder Duff Conacher also testified before this Committee on the issue of preventing foreign interference at its meeting on May 9, 2023. Committee members can [click here to see](#) the English version notice of that meeting, with links to the transcript of the evidence presented, and can [click here to see](#) the French version.

Committee members can also see a detailed system for preventing, prohibiting and penalizing all false claims in politics, to stop disinformation, in Democracy Watch's submission to the Standing Committee on Access to Information, Privacy and Ethics concerning its study of the impact of disinformation and misinformation on parliamentarians. [Click here to see](#) the English version of the submission on the Committee's website, and [click here to see the French version](#) of the submission on the Committee's website (as translated for the Ethics Committee by the House of Commons translation service).

Committee members can also see another summary list of key changes to close huge loopholes in federal election, political finance, lobbying, ethics and disinformation laws that allow for secret, unethical and undemocratic interference and influence in Canadian elections and policy-making processes, and to make enforcement effective, in Democracy Watch's news release about its final submission to the Hogue Inquiry. The news release contains links to Democracy Watch's final submission to the Inquiry, and also links to the five policy papers that Democracy Watch submitted to the Inquiry. [Click here to see](#) the English version of the news release.

NOTE: One of Democracy Watch's five policy papers, on how to stop disinformation, is essentially the same as Democracy Watch's submission to the Ethics Committee linked above, and the other four papers detail loopholes and flaws, and how to close and correct them, in 1. Donation and loan rules; 2. Third-party rules; 3. Lobbying and ethics rules, and; 4. Enforcement systems and penalties for violations.

The changes need to be made to the *CEA* and related federal laws to fully and effectively prevent, prohibit and penalize disinformation, undemocratic third-party influence and foreign interference, including changes to make enforcement independent, effective, transparent, timely and accountable. In addition to the recommended changes to Bill C-25 proposed above in Part A, key changes include:

To prevent and penalize disinformation:

1. Prohibit anonymous social media accounts and Internet sites, and bots.
2. Prohibit media and social media outlets from allowing posts with false claims, including fake videos and audio files.
3. Have complaints about disinformation go to federal agencies, boards, commissions and tribunals (ABCTs) that already have expertise in various issue areas.
4. Empower the ABCTs to order Internet and social media companies to remove false posts and webpages, and to block sites that refuse to remove or prevent false claims from being posted on their site, and to penalize misleaders with significant fines.

To stop the undemocratic, unethical influence of big money in politics:

5. Lower the annual donation and loan limit to \$75 which is the amount that 75% of donors give, as [DWatch's study of donations from 2016-2022](#) showed (to match Quebec's world-leading \$100 donation limit).
6. Prohibit financial institutions from making loans (if parties can prove they need more funds than they can raise from voters in \$75 donations, establish matching and per-vote public funding and a public loan fund to close the gap).
7. Prohibit giving fake jobs, compensation or other benefits or advantages to anyone who is considering running in a nomination or party leadership contest, and to contestants, election candidates or political party officials.
8. Prohibit donations to nomination contestants, candidates and electoral district associations (EDAs) from outside the electoral district.
9. As the CEO proposes in recommendations 2.4 and 2.5 in his recent report *Protecting Against Threats to the Electoral Process*, prohibit the applying for, and buying of, a membership in a party by anyone other than the person joining the party.

10. Require nomination contestants, candidates, EDAs, parties, party leadership contestants and third parties to publicly disclose the identity of all donors/lenders and the amount donated/loaned, and spending, before voting begins, and require quarterly disclosure between elections of donations, loans and spending by EDAs and parties.
11. Require nomination contestants, candidates, EDAs, parties and party leadership contestants to publicly disclose, before voting begins, their staff, top-level volunteers, fundraisers (and amounts raised and how) by, and require them to disclose, also before voting begins, the identities of all volunteers to Elections Canada.

To stop undemocratic, unethical influence by third parties:

12. Third-party registration and disclosure requirements, and spending limits, should not only cover election, by-election periods and nomination and party leadership contests periods, but should also be extended to cover policy-making process periods between elections (the longer the policy process, the more a citizen group would be allowed to spend).
13. As the CEO has recommended, given unpaid social media posts can go viral and reach many voters, the costs of producing all posts and materials (paid and unpaid) should be counted as part of a third-party's expenses, including the cost of purchasing supporters for a social media account. Also, as the CEO proposes in recommendation 1.7 in his recent report *Protecting Against Threats to the Electoral Process*, each post should identify the person or entity who created the post.
14. Third parties should also be required to count the costs of all their activities other than news releases and other media engagements and (for organizations) sending a message to supporters, including communicating with candidates and party officials, canvassing, holding partisan events etc.
15. The definition of "third-party" in the CEA needs to be changed so that the prohibitions, spending limits and disclosure requirements that apply to third parties clearly apply to online pseudo-media outlets that are actually third-party advocacy organizations. As well, as the U.S. once had, a Fairness Doctrine should be enacted that requires media outlets to give equal space to opposing points of view on all issues.

To stop secret, unethical lobbying and unethical policy-making:

16. Close all the loopholes that currently allow for secret lobbying, and prohibit lobbyists from sponsoring interns in MP offices.

17. Reverse the changes made to the *Lobbyists' Code* last year so lobbyists will again be prohibited from fundraising, campaigning and assisting politicians and party leaders.
18. Prohibit politicians, their staff, Cabinet appointees and government employees from having outside jobs, secret investments, and from accepting gifts or other benefits, and prohibit them from taking part in decision-making processes when they have even an appearance of a conflict of interest.

To ensure independent, effective, transparent, timely and accountable enforcement of every law:

19. Establish fully independent, merit-based appointment processes for all key watchdogs, and have them all serve for one fixed term of 5-7 years, fully independent from Cabinet with dismissal only for cause.
20. Establish a new, fully independent police force to take over from the RCMP and FINTRAC enforcement of anti-foreign interference, anti-corruption, anti-money laundering and proceeds of crime laws.
21. Have Elections Canada run all nomination contests and party leadership contests.
22. Require all the watchdogs to do regular, random, unannounced audits and inspections.
23. Require all of the watchdogs to investigate and rule on allegations of wrongdoing in a timely manner.
24. Require all the watchdogs to issue a public notice summarizing the reasons for every enforcement decision they make.
25. Empower all the watchdogs to impose any penalties for violations, and require them to impose a penalty for every violation, and increase the penalties to discourage violations on a sliding scale based on the income of the violator.
26. Allow anyone to challenge in court any decision of any watchdog.
27. Make Elections Canada the auditor for nomination contestants, election candidates, EDAs, parties, party leadership contestants and third parties.
28. Establish a strong, best-practice whistleblower protection system for all wrongdoing related to foreign interference.

All of these changes are needed to actually, finally, have coherent, ethical, democratic, fair and egalitarian political finance, electoral and policy-making systems.

C. Conclusion – If they actually want to, MP and parties can have fair, democratic elections and policy-making, and can stop foreign interference

If the members of the Committee, and their political parties and party leaders, are actually interested in having, finally, coherent, ethical, democratic, fair and egalitarian political finance, electoral and policy-making systems, and in preventing foreign interference, they will work together to introduce a bill as soon as possible making all the changes listed above in Parts A and B.

Making these changes, and complying with the new legal provisions that these changes will establish, will greatly increase the public's current very low level of trust in federal politicians and the federal government, and in the federal electoral system and policy-making process.