

**PUBLIC INQUIRY INTO FOREIGN INTERFERENCE IN FEDERAL ELECTORAL
PROCESSES AND DEMOCRATIC INSTITUTIONS**

**Written submissions of the Russian Canadian Democratic Alliance
with respect to Stage 2 hearings and the policy phase
(clauses (a)(i)(C) and (E) of the Commission's *Terms of Reference*)**

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The Russian Regime’s Influence and the Urgent Need for Action

[1] Russian interference in Canada’s democracy is persistent, pervasive and has far-reaching consequences. The Canadian government has thus far failed to detect, deter, and counter this threat, a failure that remains largely unacknowledged. There is a need for a thorough overhaul in how the Canadian government perceives, assesses, and addresses Russian interference in Canada’s democratic processes and institutions, particularly in elections.

[2] On December 4, 2023, Commissioner Hogue granted standing to the Russian Canadian Democratic Alliance (“**RCDA**”) because she was “satisfied that understanding [the Russian Canadian] community’s experience would further the work of the Commission.”¹ The RCDA’s core mission is to support the development of those members of the Russian Canadian community supportive of the ideals of democracy, human rights, civil liberties and the rule of law.² Only this Commission of Inquiry’s final report will reveal whether it has truly understood the Russian Canadian community’s perspective.

[3] The Russian regime has a long-standing and intensifying interest in interfering with Canada’s democratic institutions and processes. Although these activities trace back to the Cold War era, the last decade has seen a sharp escalation in Russian interference, directly aligned with the Russian regime’s evolving geopolitical aims. The extent of Russian interference in Canada extends far beyond what is detailed in these submissions, encompassing additional information received by this Commission of Inquiry independently of the RCDA. Due to time and resource constraints, the RCDA focuses on the essential aspects of Russian interference in Canada’s democratic processes and institutions known to the RCDA.

[4] The present submissions outline the known landscape of Russian influence, detailing interference in the lead-up to and during the 2019 and 2021 general elections, involvement in the so-called “Freedom Convoy”, and the recent Tenet Media operation, among other campaigns. The RCDA provides a critical assessment of Canada’s current response to these actions, highlighting gaps and vulnerabilities in existing measures and examining human rights implications. By outlining the impact of Russian propaganda and influence efforts in Canada, these submissions underscore the pressing need for a robust response to effectively detect, deter, and counter such interference in Canada’s democratic processes and institutions, with a focus on protecting election integrity.

[5] These submissions conclude with recommendations to fortify the resilience of Canada’s democratic institutions and processes in the face of Russian interference. The RCDA hopes that this Commission of Inquiry’s final report will trigger a strong response to Russian interference—one that should promote, rather than limit, the rights and freedoms of Canadians and the Russian diaspora. This Commission of Inquiry’s final report is the Russian Canadian

¹ Foreign Interference Commission, “[Decision on Applications for Standing](#)” (4 December 2023) at paras 182-185.

² “[About Us](#)”, *Russian Canadian Democratic Alliance*.

community’s best hope for the government to act decisively against Russian interference and protect the integrity of Canada’s democracy and the safety of the Russian diaspora.

The Russian Regime Cares About How Canadians Think and Vote

The Government and this Commission of Inquiry Downplayed the Russian Regime’s Threat

[6] During Stage 1 of this Commission of Inquiry’s proceedings, Canada’s intelligence agencies downplayed the threat of the Russian regime to Canadian federal elections. The Canadian Security Intelligence Service (“CSIS”) Representative of the Security and Intelligence Threats to Elections Task Force (“SITE TF”) explained that “Russia has the capability to interfere in Canadian democratic structures, but it appears that Russia has *little interest* in doing so.”³ The summary of classified information about Russia for Stage 1 notably claimed that Canada “does not have the same profile for Russia as some of our allies as a target for its disinformation activities” and that Russia “is likely not currently a significant foreign interference (FI) *actor* in relation to Canadian federal elections.”⁴ The RCDA’s cross-examination of numerous witnesses during Stage 1 exposed significant evidence suggesting, to the contrary, that the Russian regime poses a threat to Canada.⁵ Nevertheless, this Commission of Inquiry’s Initial Report concludes that although “Russia had the means to engage in foreign interference in Canadian elections, it appears to *lack the intent* to do so.”⁶ The Initial Report also concludes that Canada “does not have the same profile for Russia as some of our allies as a target for its disinformation activities”⁷ and that “Russia is likely not currently a significant foreign interference *threat* to Canadian federal elections.”⁸

[7] These erroneous conclusions prompted the RCDA to file an Application to Revisit the Commission’s Initial Report, Conduct Certain Investigative Steps and to Hold Certain Public Hearings (“**Application**”) in July 2024. This Commission of Inquiry dismissed that application in September 2024, a few days *after* the Tenet Media allegation became public through an unsealed U.S. Indictment. Indeed, while the government and this Commission of Inquiry were downplaying the Russian threat, Tenet Media—a significant campaign orchestrated by Russian agents and two Canadians residing in Québec—was in full swing, trying to influence Canadian opinions and votes. From November 2023 to September 2024, a period that overlapped with four by-elections, this operation produced thousands of videos seen by millions of Canadians and Americans. Tenet Media is just the latest chapter in a long history of Russian interference in Canada’s democratic institutions,⁹ going back to the Gouzenko affair after World War II.¹⁰

³ L King, T Denham, G Dobner, E Gordon & CSIS Representative, “Public Interview Summary” (WIT0000045) at 8.

⁴ Canada, “Country Summary: Russia” (CAN.SUM.000006) at 2 [emphasis added].

⁵ See e.g. [RCDA Submissions \(stage 1\)](#) at para 25.

⁶ Foreign Interference Commission, “[Initial Report](#)” (3 May 2024) at 93 [Initial Report] [emphasis added].

⁷ *Ibid* at 93.

⁸ *Ibid* at 27 [emphasis added].

⁹ Panel on Public Awareness and Education, English Interpretation—Day 26 (McGrann & Herrera) at 84.

¹⁰ Canada, [Royal Commission Appointed under Order in Council P.C. 411 of February 5, 1946 to Investigate the Facts Relating to and the Circumstances Surrounding the Communication, by Public Officials and Other Persons in Positions of](#)

Russia Has the Intent to Interfere, Despite Canada's Ongoing Failure to Observe Russian Interference

[8] The fact that the Tenet Media operation evaded Canada's security agencies, particularly the SITE TF, shows that even in the absence of detection, Canadians cannot assume the Russian regime is not trying to interfere. It is dangerous to assume the Russian regime is not a threat because interference was allegedly not observed during the last two general elections, as the government and this Commission of Inquiry did during Stage 1.

[9] It is clear that the Russian regime has long aimed to interfere in Canada's democratic institutions, especially Canada's elections. This has always been evident to the Russian diaspora. The fact that this Commission of Inquiry accepted the government's conclusions during Stage 1, without any apparent scrutiny, and despite the RCDA's submissions, shows that it failed to consider "that understanding [the Russian Canadian] community's experience would further" its work, which was the impetus for granting standing to the RCDA in the first place.¹¹

[10] The fact that the government did not "observe" such interference during the last two federal general elections speaks volumes about the inadequacy of the measures in place to protect democracy, rather than the intentions of the Russian regime. Indeed, when asked whether there was a difference between the lack of observation of foreign interference and the lack of intent to conduct foreign interference, Alia Tayyeb, Deputy Chief, Signals Intelligence, at the Communications Security Establishment ("CSE"), recognized in her testimony that CSE can only comment on the foreign interference it observes.¹² Alia Tayyeb also testified that CSE knows it may have been unable to observe some foreign efforts to interfere in the last two general elections.¹³

[11] As Richard Fadden, former director of CSIS, stated: "If you think naively that the Russians don't care as much about influencing Canadian thought, penetrating the Canadian government at all levels — I'm here to tell you they care deeply about shaping how you think, how you vote and sowing chaos and discord."¹⁴

[12] The summary provided by the government for Stage 2 of this Commission of Inquiry's work adopts a more realistic tone regarding the threat posed by the Russian regime, although it fails grasp its full severity. The summary states that "Russia poses a substantial threat to Canada and its allies. While we have not detected significant foreign interference targeting Canada's past federal elections and democratic institution, this does not rule out future actions."¹⁵ The summary continues to claim that "Canada does not currently have the same profile for Russia as some of our allies as a target for disinformation and other Russian FI related activities."¹⁶ While it's true that each country

[*Trust of Secret and Confidential Information to Agents of a Foreign Power*](#) (Commissioners: R Taschereau & R L Kellock). See also Canada, "Canada's Strategy for Countering Hostile Activities by State Actors" (CAN003249) at 5; M Mendicino, English Interpretation—Day 32, Cr-Ex (Sirois) at 65.

¹¹ Foreign Interference Commission, "[Decision on Applications for Standing](#)" (4 December 2023) at paras 182-185.

¹² S Khoury, C Xavier & A Tayyeb, Floor Transcript—Day 23, Cr-Ex (Sirois) at 98.

¹³ S Khoury, C Xavier & A Tayyeb, Floor Transcript—Day 23, In-Ch (Dann) at 22.

¹⁴ "[Meet the right-wing Canadian influencers accused of collaborating with an alleged Russian propaganda scheme](#)", *RCI* (6 September 2024).

¹⁵ Canada, "Country Summaries: People's Republic of China, Russia, India, Iran and Pakistan" (CAN.SUM.000030) at 6.

¹⁶ *Ibid.*

has a distinct “profile,” assessing the Russian regime’s threat relative to other nations holds limited value. Such comparisons risk unjustifiably downplaying the Russian threat to Canada and can be expected to lead to inadequate measures and responses for Canada’s democratic processes and institutions.¹⁷ Such an approach would not take into account that opportunities for interference in Canada are not constant and may be more appealing at certain points in time, such as during the last two federal general elections and the “Freedom Convoy.”

[13] This Commission of Inquiry must ensure that it considers the full threat of Russian interference in Canada, even if the Russian regime may prioritize interfering in other countries. Canada is a valuable target for interference: it strongly supports the international rules-based order and Ukraine,¹⁸ it has overlapping Arctic seabed claims with Russia,¹⁹ Canada is a member of the Five Eyes, NATO and the G7, and has close ties with the United States.²⁰ Further, Russia’s strategic objectives, such as winning the war in Ukraine, dismantling the rules-based international order,²¹ expanding its Arctic presence,²² countering NATO’s influence,²³ and extending its reach in the “Global South”²⁴ are attainable only if Western democracies—Russia’s perceived enemies—are too weak or distracted to respond effectively.²⁵ The RCDA believes the Russian regime sees Canada as an ideal target for such interference.²⁶

[14] Between July 2021 and Spring of 2023, CSE found that *all* 146 national elections globally (including the 2021 general election in Canada) “were subject to online disinformation geared towards influencing voters and the election.”²⁷ Only 15% of these campaigns were formally attributed to foreign actors, and of this 15%, the CSE identified just two countries—Russia and China—as the perpetrators.²⁸

¹⁷ See e.g. P Lafortune, T Denham, C Termorshuizen, D Morrison, W Epp & A Lévêque, Floor Transcript—Day 28, Cr-Ex (Sirois) at 198-99.

¹⁸ S Burns, “[Contributions to Ukraine: Is Canada Punching Below its Weight?](#)”, *NATO Association of Canada* (18 April 2023).

¹⁹ “[Canada extends its Arctic Ocean seabed claim all the way to Russian waters](#)”, *Arctic Today* (12 December 2022).

²⁰ This was recognized in September 2020, see Government of Canada, “Canada’s Strategy for Countering Hostile Activities by State Actors” (CAN003249) at 5. See also Communications Security Establishment Canada, [National Cyber Threat Assessment 2025-2026](#) (2024) at 5.

²¹ C L Henderson, M Tessier, D Vigneault, V Lloyd, N Giles & B Basner, Floor Transcript—Day 24, Cr-Ex (Sirois) at 225; S Lehne, “[The Rules-Based Order vs. the Defense of Democracy](#)”, *Carnegie Endowment for International Peace* (18 September 2024).

²² C Wall & N Wegge, “[The Russian Arctic Threat: Consequences of the Ukraine War](#)”, *Center for Strategic & International Studies* (25 January 2023).

²³ J Masters, “[Why NATO Has Become a Flash Point With Russia in Ukraine](#)”, *Council on Foreign Relations* (20 January 2022).

²⁴ M Ferragamo, “[Russia’s Growing Footprint in Africa](#)”, *Council on Foreign Relations* (28 December 2023).

²⁵ M Mendicino, English Interpretation—Day 32, Cr-Ex (Sirois) at 64.

²⁶ See [RCDA Submissions \(stage 1\)](#) at 6.

²⁷ Communications Security Establishment Canada, [Cyber Threats to Canada’s Democratic Process: 2023 Update](#) (December 2023) (filed under COM0000598.EN in the Commission’s documents). See also Communications Security Establishment Canada, [Cyber Threats to Canada’s Democratic Process: July 2021 Update](#) (July 2021). The RCDA is aware, for instance, that African and other developing countries are targets of Russian propaganda: U.S. Department of State, “[The Kremlin’s Efforts to Spread Deadly Disinformation in Africa](#)” (12 February 2024). See also M Joly, Floor Transcript—Day 32, Cr-Ex (Sirois) at 189; P Lafortune, T Denham, C Termorshuizen, D Morrison, W Epp & A Lévêque, Floor Transcript—Day 28 Cr-Ex (Sirois) at 204.

²⁸ *Ibid* at 4.

[15] In light of the Russian regime’s key strategic objectives outlined above, it is clear that Russia is intentionally engaging in complex, multi-year operations against Canada’s democratic processes and institutions. To this effect, the Foreign Interference Coordinator testified that Russia is a “persistent” actor with an ongoing intent to interfere with Canada’s democracy.²⁹

Known Instances of Russian Interference

[16] The current “information” operations (also referred to as disinformation, propaganda or influence operations) from the Russian regime draw from a Soviet-era strategy known as “active measures,” which describes covert or plausibly deniable operations designed to subvert or otherwise influence foreign states.³⁰ Russian information operations are designed to help the Russian regime attain its domestic and international ambitions.³¹

[17] In addition to its other strategic disinformation efforts, such as discrediting NATO and Ukraine, Russia’s regime actively exploits political debates in democracies. It aims to erode trust in institutions, heighten social tensions, and weaken political unity in targeted countries, including Canada.³² This strategic objective aligns with the concept of hybrid warfare, which blends conventional military tactics with espionage, cyber-attacks, electoral interference, and disinformation to achieve political aims without direct military confrontation.³³ This seems to be an integral part of the Kremlin’s policy vis-à-vis the West, including Canada.³⁴

[18] To minimize detection and maximize impact, Russia’s regime embeds its information operations within legitimate societal concerns or political debates. In Canada, Russia amplified issues like the “Freedom Convoy,” the invocation of the *Emergencies Act*, inflation, and immigration.³⁵ In the United States, Russia heightened polarization over gun control, racial tensions, police-community relations, and abortion.³⁶ The interconnectedness of the American and Canadian media ecosystems further impedes detection efforts and exacerbates divisions in both countries.³⁷

²⁹ S Aubertin-Giguère, S Tupper & T Geddes, Floor Transcript—Day 30, Cr-Ex (Sirois) at 155-156.

³⁰ Canadian Security Intelligence Service, “[Who Said What?: The Security Challenges of Modern Disinformation](#)” (February 2018) at 31.

³¹ I Stradner & J Hardie, “Russia” in B Bowman, ed, *Cognitive Combat: China, Russia and Iran’s Information War Against Americans* (Washington DC: FDD Press, 2024) 19 at 20.

³² Government of Canada, “[Russia’s use of disinformation and information manipulation](#)” (last modified 28 February 2024).

³³ A Bilal, “Russia’s hybrid war against the West” (26 April 2024): *NATO Review* <https://www.nato.int/docu/review/articles/2024/04/26/russias-hybrid-war-against-the-west/index.html>.

³⁴ *Ibid*; W Blair, English Interpretation—Day 33, Cr-Ex (Sirois) at 85.

³⁵ C Orr Bueno, “Russia’s Role in the Far-Right Truck Convoy: An Analysis of Russian State Media Activity Related to the 2022 Freedom Convoy” (RCD0000060); L LeBrun, “[Far-Right Media Outlet Linked to Secret Russian Influence Campaign Produced 50+ Videos Focused on Canada](#)”, *Press Progress* (5 September 2024).

³⁶ M Hosenball, “Russia stoking U.S. racial, social divisions ahead of election: sources” (10 March 2020): *Reuters* <https://www.reuters.com/article/us-usa-election-security/russia-stoking-u-s-racial-social-differences-ahead-of-election-sources-idUSKBN20X2O3>.

³⁷ J-C Boucher, L Rutherglen & S Y Kim, “[Transnationalism and Populist Networks in a Digital Era: Canada and the Freedom Convoy](#)” (2024) 68:4 *International Studies Quarterly* sqae131; S Carvin, “[Incident Update 2 | An Inflection Point on the Current State Russian-Directed Foreign-Interference Operations](#)”, *Canadian Digital Media Research Network* (20 September 2024).

[19] By coordinating inauthentic behavior across multiple channels and multiple countries—a tactic known as the “firehose of falsehood”—Russian operatives create the illusion of widespread consensus or dissent.³⁸ In an era of anger and deep frustrations, some American analysts are now suggesting that incumbency may no longer be an advantage in presidential elections, which points to the further destabilization of democracies.³⁹ At least in Canada, Russia has largely avoided targeting any specific individuals or organizations.⁴⁰ This may help explain why China’s disinformation campaigns targeting Kenny Chiu or Michael Chong were detected, while Russia’s amplification of pre-existing political or social grievances largely went unnoticed.⁴¹

[20] For these reasons, it is exceedingly difficult to detect and assess the full extent of the Russian regime’s influence campaigns. This difficulty prompted the Standing Committee on Public Safety and National Security (“SECU”) to recommend, in its March 2023 report assessing Canada’s security posture regarding Russia, that “the Government of Canada examine the full extent of Russian disinformation – and other state-backed disinformation – targeting Canada, the actors, methods, messages and platforms involved, and the impact this disinformation is having on the Canadian population and Canada’s national security, and that it report its findings to Parliament annually.”⁴² In February 2023, the Public Order Emergency Commission (“POEC”), tasked with investigating the events leading to the first-ever invocation of the *Emergencies Act*, made a similar recommendation, apparently without suspecting that Russia played a significant role in amplifying the “Freedom Convoy” and spreading false narratives during the pandemic, as discussed below.⁴³

[21] Despite these significant challenges in detecting and assessing the full extent of Russian influence campaigns online, there was no shortage of evidence presented during this Commission of Inquiry’s proceedings to illustrate that the Russian regime has been conducting multiple operations for nearly a decade, including, but not limited to, the last three federal general elections and the most recent by-elections. Notably, Minister of Foreign Affairs Mélanie Joly testified that it is clear that “Russian propaganda targets Canadian elections and democracy.”⁴⁴ However, due to the government’s failure to implement the SECU and POEC recommendations, as well as the shortcomings of this Commission of Inquiry, these operations will likely remain unknown to the public for the foreseeable future.

³⁸ C Paul & M Matthews, “[The Russian ‘Firehose of Falsehood’ Propaganda Model](#)”, *Rand* (11 July 2016).

³⁹ L Drutman, “[Incumbency Is No Longer an Advantage in Presidential Elections](#)”, *Time* (21 December 2023).

⁴⁰ M Joly, Floor Transcript—Day 32, Cr-Ex (Lew) at 191 [*our translation*]. With the notable exception of Prime Minister Trudeau, who has been a target of Russian disinformation campaigns since 2018. See e.g. “[Top 10 Russophobes of 2018: See who made RT’s prestigious list this year](#)”, *RT* (16 October 2018); “[Major Russian disinfo site featuring anti-Trudeau articles prompts calls for new focus at public inquiry](#)”, *CBC News* (14 September 2024).

⁴¹ C Lévesque, “[Former Conservative MP says he was ‘drowning’ in Chinese election misinformation](#)” *National Post* (3 April 2024); R Raycraft, “[Global Affairs says disinformation operation targeted MP Michael Chong on WeChat](#)”, *CBC News* (9 August 2023).

⁴² House of Commons, Standing Committee on Public Safety and National Security, [Up to the Task: Strengthening Canada’s Security Posture in Relation to Russia](#) (March 2023).

⁴³ Canada, Public Order Commission, [Report of the Public Inquiry into the 2022 Public Order Emergency: Analysis \(Part 2\) and Recommendations](#), vol 3 (Ottawa: Privy Council Office) at 333.

⁴⁴ M Joly, Floor Transcript—Day 32, Cr-Ex (Sirois) at 181 [*our translation*].

Escalating Russian Influence and Interference in Canadian Democracy (2013-2018)

[22] The Russian regime intensified its attempts to influence Canada’s democracy in the aftermath of the invasion of Crimea and Canada’s support for Ukraine’s Euromaidan movement.⁴⁵ Erin O’Toole testified that he was a victim of Russian trolling activity as Minister of Veterans Affairs following the invasion of Crimea.⁴⁶ When asked about the government’s proposition that election interference in 2019 “was kind of new”, Tom Mulcair, New Democratic Party’s (“NDP”) Leader from 2012-2017, responded that “Russia had been playing a role actively and trolling in” the 2015 election.⁴⁷ Marcus Kolga, a leading Canadian expert on Russian disinformation, published a report on the Russian regime’s interference in Canada’s 2015 federal general election.⁴⁸ Russia was pleased with the result. For example, the Russian Congress of Canada sent a letter to newly elected Prime Minister Trudeau pointing out how a “considerable part of the Russian community made a deliberate choice and gave its vote for you” and “we trust that the Liberal government will improve the relationship between the two countries.”⁴⁹

[23] In 2017, the Kremlin attempted to derail the adoption of the *Magnitsky Act*.⁵⁰ Azam Ishmael, who became national director of the Liberal Party in 2017, testified that the party “was very alive” to the threat of Russian interference in the wake of this attempt.⁵¹ In or around 2018, the Kremlin also initiated a smear campaign against Prime Minister Trudeau.⁵² An August 2018 media report indicated that Russian Twitter trolls targeted Canadians over multiple years, and tried to sow discord on polarizing issues such as asylum seekers, Syria, and pipelines, and capitalized on key divisive events like the Fort McMurray fire (May 2016), the Québec mosque shooting (January 2017), and a spike in border crossings (August 2017).⁵³ A further CBC/Radio-Canada analysis of 9.6 million tweets in February 2019 found evidence of Russian interference attempts, including trolling and the amplification of divisive issues in Canada, as early as 2013.⁵⁴

New Evidence of Russian Interference in the 2019 and 2021 Federal General Elections

[24] As discussed at length in RCDA’s Stage 1 submissions and Application, there is evidence of Russian interference during the last two federal general elections. Yet, the scope and impact of this interference will likely remain unknown

⁴⁵ M Kolga, “Stemming the Virus: Understanding and responding to the threat of Russian disinformation” (RCD0000033) at 19, 23, 29

⁴⁶ E O’Toole, Floor Transcript—Day 18, Cr-Ex (Sirois) at 189.

⁴⁷ CTV News, “FOREIGN INTERFERENCE | PM Trudeau needs to be ‘direct’ in his testimony: Tom Mulcair” (10 April 2024) from 07m:15s, (video): *YouTube* https://www.youtube.com/watch?v=58DtOul_IWc.

⁴⁸ M Kolga, “Stemming the Virus: Understanding and responding to the threat of Russian disinformation” (RCD0000033) at 37.

⁴⁹ *Ibid* at 30.

⁵⁰ D Levin & J Becker, “Canadian Lawmakers Say Pro-Russia Group Tried to Derail Sanctions Law” (RCD0000031).

⁵¹ A Ishmael, Floor Transcript—Day 20, Cr-Ex (Sirois) at 164-65.

⁵² [RCDA Submissions \(stage 1\)](#) at 8-10.

⁵³ R Rocha, “[Data sheds light on how Russian Twitter trolls targeted Canadians](#)”, *CBC News* (3 August 2018).

⁵⁴ R Rocha & J Yates, “[Twitter trolls stoked debates about immigrants and pipelines in Canada, data show](#)”, *CBC News* (12 February 2019).

due to both this Commission of Inquiry’s failure to properly examine and assess this interference, and the government’s failure to implement critical recommendations from SECU and the POEC.

[25] During the 2019 federal general election, Russia continued the influence operation it began in 2018 aimed at weakening the sitting government and its Prime Minister.⁵⁵ In the 2021 general election, Russia both undermined the Conservative Party of Canada (“CPC”) due to its tougher stance on the Russian regime, and amplified support for the People’s Party of Canada (“PPC”).⁵⁶ New evidence emerged during Stage 2 that should prompt the Commissioner to revisit her Initial Report’s conclusions regarding Russia, pursuant to the Commissioner’s Decision on Application to Revisit Commission’s Initial Report, Conduct Certain Investigative Steps and to Hold Certain Public Hearings.⁵⁷

[26] Notably, the U.S. Indictment about Tenet Media revealed that during the 2021 federal general election, Lauren Chen, co-founder of Tenet Media, was contracted by RT to actively amplify the PPC and undermine the CPC, particularly targeting Erin O’Toole and, to a lesser extent, Prime Minister Trudeau.⁵⁸ The Principal Investigator at the Media Ecosystem Observatory (“MEO”), when confronted with these allegations and social media posts from Lauren Chen during 2021 general election, found that it was “highly consequential that someone, a Canadian, was taking money from a Russian government-controlled entity to influence Canadian politics.”⁵⁹

[27] Azam Ishmael, who was also national Liberal Party campaign director during the 2021 federal general election, had no information to contradict the evidence of Russian meddling in the 2019 and 2021 general elections, and was not surprised that the Russian regime tried to discredit the Liberal Party, while simultaneously promoting the opposition during both elections.⁶⁰

[28] During Stage 2 of this Commission of Inquiry’s work, it became increasingly evident that the government did, in fact, observe Russian interference during the last two general elections, despite previous statements to the contrary.⁶¹ However, the government views the aim of this interference as amplifying discontent, promoting the Russian regime’s narratives, or “attacking the system”, rather than influencing the electoral *outcome* directly.⁶² This demonstrates a clear lack of foresight on the government’s part. There is, of course, a direct link between Russian information operations and how they ultimately affect the election results. As indicated above, it is less about Russia preferring one candidate over another, as China appears to do, and more about shaping how Canadians think and vote

⁵⁵ [RCDA Submissions \(stage 1\)](#) at 4.

⁵⁶ *Ibid* at 13.

⁵⁷ Foreign Interference Commission, “[Decision on Application to Revisit Commission’s Initial Report, Conduct Certain Investigative Steps and to Hold Certain Public Hearings](#)” (18 September 2024) at para 41.

⁵⁸ United States, “Indictment of Kalashnikov and Afanasyeva” (RCD0000019) at para 10.

⁵⁹ P Loewen, T Owen & A Bridgman, English Interpretation—Day 22, Cr-Ex (Sirois) at 193.

⁶⁰ A Ishmael, Floor Transcript—Day 20, Cr-Ex (Sirois) at 165-69.

⁶¹ D Rogers, N G Drouin; J Hannaford, J H Thomas & J Charette, Floor Transcript—Day 31, Cr-Ex (Sirois) at 134-35. *Contra* Canada, “Country Summaries: People’s Republic of China, Russia, India, Iran and Pakistan” (CAN.SUM.000030) at 6-7.

⁶² D Rogers, N G Drouin; J Hannaford, J H Thomas & J Charette, Floor Transcript—Day 31, Cr-Ex (Sirois) at 134-35; W Blair, English Interpretation—Day 33, Cr-Ex (Sirois) at 82-83.

on key issues. This is nonetheless foreign interference in elections in its purest form and this Commission of Inquiry's final report must so conclude.

Russian Interference During the Pandemic and the "Freedom Convoy": A Strategic Distraction for the Invasion of Ukraine

[29] The September 2020 version of Canada's Strategy for Countering Hostile Activities by State Actors (a document only made available to the parties during Stage 2 of this Commission of Inquiry's proceedings) offers one of the most realistic assessments of the Russian threat to Canada's democracy and national security (emphasis added):

Russia leverages numerous government and non-government entities to support its influence efforts. In addition to the highly capable intelligence services, Russia **utilizes** current and former senior **political figures, diaspora and compatriot groups**, cultural and economic entities, the **media and its diplomatic staff to carry out interference** and espionage activities. [...]

Russia is an active and highly sophisticated cyber threat actor that uses cyber threat activity to support its economic and security intelligence priorities, including domestic surveillance, cyber espionage and **aggressive online foreign influence operations**. [...] Russia is willing to leverage disruptive and destructive cyber threat activities as a means of coercion against countries within Russia's perceived sphere of influence, particularly Ukraine. Although to a much lesser extent, **Russia targets critical infrastructure in Canada** and other Western states, in a similar manner, [REDACTED]. [...]

During the pandemic, Russia has increased its information operations, spreading disinformation and exploiting wedge issues in liberal democratic countries. For example, the Canadian-led NATO battle group in Latvia was the target of pandemic-related disinformation attributed to Russia. [...]⁶³

[30] The Russian regime's influence efforts during the pandemic have been relatively well documented, especially in the United States.⁶⁴ Although there are more limited studies about the Russian regime's effort in Canada specifically, Prime Minister Trudeau testified that Russia was behind the amplification of "anti-vax" disinformation in Canada.⁶⁵ Further, in a report about vaccine hesitancy in Canada, the MEO found that the "vaccine conversation on social media largely originates from U.S.-based discussions" and that "Canadians on social media are heavily influenced by U.S.-based information and are far more likely to propagate non-Canadian content."⁶⁶ Nevertheless, against this backdrop of Russian influence operations during the pandemic, one of the key issues during the 2021

⁶³ Canada, "Canada's Strategy for Countering Hostile Activities by State Actors (CAN003249) [*our emphasis*]; R Rochon & R Stewart, English Interpretation—Day 30, Cr-Ex (Sirois) at 74. See also M Mendicino, English Interpretation—Day 32, Cr-Ex (Sirois) at 68.

⁶⁴ See e.g. W Moy & K Gradon, "[COVID-19 Effects and Russian Disinformation](#)" (2020) 16 Homeland Security Affairs (Special Covid Issue); for instance; E Lucas, J Morris & C Rebegea, "[Information Bedlam: Russian and Chinese Information Operations During the Covid-19 Pandemic](#)", *Center for European Policy Analysis* (15 March 2021).

⁶⁵ J Trudeau, Floor Transcript—Day 35, Cr-Ex (Sirois) at 162. See also C Orr Bueno, "Russia's Role in the Far-Right Truck Convoy: An Analysis of Russian State Media Activity Related to the 2022 Freedom Convoy" (RCD0000060) at 9-10.

⁶⁶ T Owen, P Loewen, D Ruths et al, "[Understanding vaccine hesitancy in Canada: attitudes, beliefs, and the information ecosystem](#)", *Media Ecosystem Observatory* (December 2020) at 1.

election, the government maintained that the Russian regime had little interest in interfering and that it was “likely not currently a significant foreign interference (FI) actor” in that election.⁶⁷

[31] In early 2022, the “Freedom Convoy” protests paralyzed a portion of downtown Ottawa and blocked key border crossings, which resulted in significant economic losses and international embarrassment.⁶⁸ The long-term consequences of the “Freedom Convoy,” including the first-ever invocation of the *Emergencies Act*, led to “deepening divides and shrinking common ground in Canada,” a re-appraisal of Canada as “a place to do business,” a “loss of confidence in the police and governments” as well as “damage and loss of value to Canada’s brand.”⁶⁹

[32] Prime Minister Trudeau confirmed in his testimony that Russia “hugely” amplified narratives surrounding the disturbance in Ottawa, a campaign of social division that continues to this day notably through social media channels.⁷⁰ The Russian regime amplified the protests as strategic distractions from its imminent invasion of Ukraine, just as the United States raised alarms about Russia’s military actions.⁷¹ Marco Mendicino, then Minister of Public Safety, testified that the “connection between that illegal invasion and the foreign interference in Canada is quite clear.”⁷² Indeed, this operation perfectly aligned with Russia’s geopolitical aims at that time: On February 23-24, as the protesters’ vehicles departed Ottawa, the Russian armed forces entered Ukraine, rushing toward Kyiv.

Tenet Media Operation: Harvesting Canadian Minds During Four By-Elections

[33] According to Prime Minister Trudeau, the Tenet Media operation fits within the same strategy and *modus operandi* as the “Freedom Convoy” influence operation discussed above.⁷³ In the words of Stephanie Carvin, Associate Professor of International Relations, the Tenet Media operation serves as a “harsh reminder that Canada is not only affected, but also implicated” in Russian online foreign interference campaigns.⁷⁴ Indeed, over the course of a relatively short period overlapping four by-elections, Tenet Media produced thousands of videos seen by millions of Canadians and Americans, including more than 50 videos specifically directed at Canadians that garnered

⁶⁷ Canada, “Country Summary: Russia” (CAN.SUM.000006) at 2.

⁶⁸ See e.g. Canada, Public Order Commission, [Report of the Public Inquiry into the 2022 Public Order Emergency: Analysis \(Part 2\) and Recommendations](#), vol 3 (Ottawa: Privy Council Office) at 57-58. The Freedom Convoy was partly inspired by the Yellow Vest movement, also amplified by Russia: Canada, Public Order Commission, [Report of the Public Inquiry into the 2022 Public Order Emergency: Analysis \(Part 1\)](#), vol 2 (Ottawa: Privy Council Office) at 81; C Gérard, G Marotte & L Salamatian, “[RT, Sputnik et le mouvement des Gilets jaunes: cartographie des communautés politiques sur Twitter](#)” (2020) 40:1 L’Espace Politique [In English: “RT, Sputnik and the Yellow Vests Movement: Mapping Political Communities on Twitter”].

⁶⁹ D Eisler & K Lynch, “[The Trucker’s Convoy: Examining the Consequences for Canada](#)”, *Johnson Shoyama Graduate School of Public Policy* (9 March 2022).

⁷⁰ J Trudeau, English Interpretation—Day 35, Cr-Ex (Sirois) at 159. See also C Orr Bueno, “Russia’s Role in the Far-Right Truck Convoy: An Analysis of Russian State Media Activity Related to the 2022 Freedom Convoy” (RCD0000060) at 1, 11.

⁷¹ Canada, “2023 Threat Summary Report” (CAN023184) at 5. See also C Orr Bueno, “Russia’s Role in the Far-Right Truck Convoy: An Analysis of Russian State Media Activity Related to the 2022 Freedom Convoy” (RCD0000060) at 4-5.

⁷² M Mendicino, English Interpretation—Day 32, Cr-Ex (Sirois) at 64-65.

⁷³ J Trudeau, Floor Transcript—Day 35, Cr-Ex (Sirois) at 163.

⁷⁴ S Carvin, “[Incident Update 2 | An Inflection Point on the Current State Russian-Directed Foreign-Interference Operations](#)”, *Canadian Digital Media Research Network* (20 September 2024).

half a million views.⁷⁵ Further, nearly 25% of the roughly 2,000 podcast episodes from January 2023 to September 2024 produced by Tenet Media personalities contained more than 1,000 distinct discussions related to Canada.⁷⁶ A study from the MEO indicates that Tenet Media influencers primarily discuss topics aligned with Russian interests, such as Canadian “political actors (e.g., Trudeau, CBC, RCMP) and issues related to social justice and immigration.”⁷⁷ Their content exhibits a “high degree of negativity when discussing Canada and only rarely discuss anything positive about Canada.”⁷⁸

[34] The RCDA never received a response to its September 6, 2024 request that this Commission of Inquiry examine and assess the allegations comprised in the US Indictment, and has not seen any significant effort from this Commission of Inquiry to examine and assess this clear instance of Russian interference.⁷⁹ This led to some awkward situations, such as Deputy Minister of Justice Curtis-Micallef’s failure to read the U.S. Indictment about Tenet Media prior to her testimony; she was consequently unable to inform this Commission of Inquiry as to whether the actions by Canadians described in the Indictment were legal in Canada.⁸⁰ Numerous witnesses were unable to provide more details about the Tenet Media operation (or other instances of Russian interference) citing national security confidentiality or investigative privilege.⁸¹ To the RCDA’s knowledge, neither the government nor this Commission of Inquiry produced a public summary of the Tenet Media operation (or other instances of Russian interference) as they did for other foreign interference operations covered by national security confidentiality.⁸²

[35] National security confidentiality should strengthen, not weaken, Canada’s national security. When asked if relying heavily on national security agencies and secrecy to counter foreign interference (such as Tenet Media) posed a risk to democracy, Allen Sutherland, Assistant Secretary for Machinery of Government and Democratic Institutions, testified that “the broad features of foreign interference [...] can be made known to Canadians” and emphasized that “more needs to be done.”⁸³ Erin O’Toole also agreed that “we really need public education about social media use,

⁷⁵ L LeBrun, “[Far-Right Media Outlet Linked to Secret Russian Influence Campaign Produced 50+ Videos Focused on Canada](#)”, *Press Progress* (5 September 2024).

⁷⁶ S Davla, N Hedfi, & A Bridgman, “[Incident Update 4 | Discussion of and sentiment towards Canada on Tenet Media influencer podcasts](#)”, *Canadian Digital Media Research Network* (18 October 2024).

⁷⁷ *Ibid.*

⁷⁸ *Ibid.*

⁷⁹ Y Novodvorskiy, “Re: Call to examine and assess allegations concerning Russian propaganda in Canada contained in the U.S. Department of Justice indictment against K. Kalashnikov and E. Afanasyeva unsealed yesterday” (September 6, 2024).

⁸⁰ S Curtis-Micallef & H Watts, English Interpretation—Day 23, Cr-Ex (Sirois) at 231-32. See also A Sutherland, English Interpretation—Day 23, Cr-Ex (Sirois) at 155.

⁸¹ See e.g. S Khoury, C Xavier & A Tayyeb, English Interpretation –Day 23, Cr-Ex (Sirois) at 93, 98; M A Flynn, M R Duheme & B Gauvin, English Interpretation—Day 27, Cr-Ex (Sirois) at 80; D Rogers, N G Drouin; J Hannaford, J H Thomas & J Charette, Floor Transcript—Day 31, Cr-Ex (Sirois) at 145; B Clow, K A Telford & P Travers, Floor Transcript—Day 34, Cr-Ex (Sirois) at 92-93.

⁸² See e.g. Canada, “Suspected Instances of Foreign Interference” (CAN.SUM.000031); Canada, “PRC Email Operations Against Parliamentarians” (CAN.SUM.000027); Canada, “Targeting of Parliamentarians” (CAN.SUM.000018); Canada, “PRC Interest in Michael Chong” (CAN.SUM.000017); Canada, “Declaration of Zhao Wei as PNG” (CAN.SUM.000016), Canada, “People’s Republic of China Police Stations” (CAN.SUM.000015).

⁸³ A Sutherland, English Interpretation—Day 23, Cr-Ex (Sirois) at 160-61.

and potentially the revealing of some of these cases like we've seen in the United States, where we can show people that there's misinformation here sowing division, sowing uncertainty, pull back the cloak as much as possible.”⁸⁴ Even Prime Minister Trudeau acknowledged that discussing and learning about Russian interference is a proactive way to build citizens' resilience and counter interference before it occurs.⁸⁵

[36] The full extent of Tenet Media's reach in Canada remains uncertain, but it is certainly significant. Furthermore, Tenet Media clearly illustrates the Canadian government's critical failure to effectively address the threat posed by the Russian regime to Canadian democracy, as discussed in greater detail below.

The Russian Regime's Current, Multi-Pronged Approach to Interfering with Canada's Democracy

[37] Why are operations like Tenet Media still happening in 2024? According to ex-CSIS director David Vigneault, “because they work,” they are “hard to detect and hard to counter, and often, [they are] low-cost for the impact [they] can yield.”⁸⁶ According to a recent CSIS intelligence assessment titled *Moscow's War in Ukraine: Implications for Russian FI Activities in Canada*, “[d]isinformation and FI foreign interference activities in Canada will continue in an effort to discredit the Government of Canada's policy on Ukraine, smear Ukrainian diaspora and their organizations in Canada, and spread Russian disinformation regarding the conflict in Ukraine.”⁸⁷ David Vigneault, director of CSIS from June 19, 2017 to July 20, 2024, testified that activities linked to psychological warfare from Russia “have taken place in Canada and continue to take place in Canada.”⁸⁸ David Vigneault added that “it's important to understand that they don't necessarily need to be directed specifically at Canada to have an impact here.”⁸⁹

[38] Prime Minister Trudeau testified under oath that Russian influence operations are not limited to the Tenet Media influencers, and that some of the most influential figures of our time, such as Tucker Carlson and Jordan Peterson, are currently being funded by RT “in order to amplify messages that are destabilizing democracies”.⁹⁰ A recent report published after this Commission of Inquiry's proceedings alleges that Elon Musk has been in regular contact with Vladimir Putin since late 2022.⁹¹ In February 2024, Tucker Carlson's two-hour interview with the Russian leader inside the Kremlin premiered on X, giving airtime to Putin and his views on the U.S. and Ukraine.⁹² As a favor to

⁸⁴ E O'Toole, English Interpretation—Day 18, Cr-Ex (Sirois) at 189.

⁸⁵ J Trudeau, Floor Transcript—Day 35, Cr-Ex (Sirois) at 167.

⁸⁶ C L Henderson, M Tessier, D Vigneault, V Lloyd, N Giles & B Basner, Floor Transcript—Day 24, Cr-Ex (Sirois) at 235 [*our translation*].

⁸⁷ Canada, “Moscow's War in Ukraine: Implications for Russian FI Activities in Canada” (CAN033122_0001).

⁸⁸ C L Henderson, M Tessier, D Vigneault, V Lloyd, N Giles & B Basner, Floor Transcript—Day 24, Cr-Ex (Sirois) at 225 [*our translation*].

⁸⁹ *Ibid* [*our translation*].

⁹⁰ J Trudeau, Floor Transcript—Day 35, Cr-Ex (Sirois) at 163 [*our translation*].

⁹¹ T Grove, W P Strobel, A Viswanatha, G Lubold & S Schechner, “[Elon Musk's Secret Conversations with Vladimir Putin](#)”, *The Wall Street Journal* (25 October 2024).

⁹² *Ibid*.

China, the Kremlin “first made the request of Musk to not activate Starlink over Taiwan.”⁹³ This cultivation of a figure like Elon Musk by a foreign government is entirely without precedent, and constitutes an “opening to influence American policy beyond the Kremlin’s wildest dreams.”⁹⁴

[39] This Commission of Inquiry heard clear evidence that the Russian regime attempts “to influence and control the Russian diaspora in Canada.”⁹⁵ Svetlana Koshkareva, a Russian Canadian activist, testified that “many Russian-speaking communities here in Canada, [are] specifically targeted by cognitive warfare,”⁹⁶ and that “Russian agents are using events, like a victory day parades [*sic*] in Canadian cities which celebrate Second War hero [*sic*] here, but have been coopted to promote support for Canadian military actions in Ukraine, including the ongoing conflicts for sure.”⁹⁷

[40] The Deputy Commissioner for Federal Policing of the Royal Canadian Mounted Police, Mark Flynn, testified that strategic businesses, as well as democratic institutions and elected officials of northern Canada are vulnerable to foreign interference, noting Russia’s strong interest in the Arctic and Canada’s territories like the Yukon.⁹⁸ Investigators and spy agencies in Europe recently uncovered a plot from the Russian regime to start “fires aboard cargo or passenger aircraft flying to the U.S. and Canada.”⁹⁹

[41] Further, Russia is also one of the top cyberthreat actors today.¹⁰⁰ According to the CSE’s National Cyber Threat Assessment 2025-2026: “Pro-Russia non-state actors, some of which we assess likely have links to the Russian government, are targeting Canada in an attempt to influence our foreign policy.”¹⁰¹ For instance, in February 2023, pro-Russia non-state cyber groups participated in a cyber campaign attempting to sabotage critical infrastructure in countries providing assistance to Ukraine, including Canada.¹⁰² In April 2023, a pro-Russia non-state cyber group claimed responsibility for a denial of service attack on the websites of the Prime Minister’s Office and the Senate as retaliation for Canada hosting a visit by Ukrainian Prime Minister Denys Shmyhal.¹⁰³

⁹³ *Ibid.*

⁹⁴ C Michel, “[Elon Musk Is Putin’s Best Weapon](#)”, *The Bulwark* (1 November 2024).

⁹⁵ Canada, “Moscow’s War in Ukraine: Implications for Russian FI Activities in Canada” (CAN033122_0001).

⁹⁶ Panel on Public Awareness and Education, English Interpretation—Day 26 (McGrann & Herrera) at 82-83.

⁹⁷ *Ibid.*

⁹⁸ M A Flynn, M R Duheme & B Gauvin, English Interpretation—Day 27, Cr-Ex (Sirois) at 77; J Greene (*CBC News*), “Yukon RCMP is monitoring potential foreign interference. What does that look like?” (RCD0000079).

⁹⁹ B Pancevski, T Grove, M Colchester & D Michaels, “[Russia Suspected of Plotting to Send Incendiary Devices on U.S.-Bound Planes](#)”, *The Wall Street Journal* (4 November 2024).

¹⁰⁰ Communications Security Establishment Canada, [Cyber Threats to Canada’s Democratic Process: 2023 Update](#) (December 2023) at 3 (filed under COM0000598.EN in the Commission’s documents); S Khoury, C Xavier & A Tayyeb, English Interpretation—Day 23, In-Ch (Dann) at 10; M A Flynn, M R Duheme & B Gauvin, English Interpretation—Day 27, In-Ch (Morgan) at 17; M A Flynn, M R Duheme & B Gauvin, English Interpretation—Day 27, Cr-Ex (Sirois) at 73. See also Government of Canada, “Government of Canada releases statement on malicious cyber activity” (3 June 2024).

¹⁰¹ Communications Security Establishment Canada, [National Cyber Threat Assessment 2025-2026](#) (2024) at 5, 14-15.

¹⁰² *Ibid.* at 15.

¹⁰³ C Tunney, “[Trudeau shrugs off reports pro-Russian hackers brought down PMO website](#)”, *CBC News* (11 April 2023); D Vatcher, J Lacroix & S Anwar, “Interview Summary: Senate Administration” (WIT0000126.EN); Communications Security Establishment Canada, [National Cyber Threat Assessment 2025-2026](#) (2024) at 15.

[42] While the attacks themselves are concerning, the most troubling aspect is the inadequate response. For instance, David Vatcher, the Senate’s Director of Information Services, testified that there is no discussion or coordination with national security agencies during these kinds of attacks, as the Senate claims it has the capability to respond independently.¹⁰⁴ While this may be true for attacks that are limited to the Senate’s website, if the Russian regime were to launch a broader assault on Canada’s democratic institutions, this lack of coordination would have severe consequences.¹⁰⁵

[43] It is also important to note that Russia has been cooperating and coordinating with other countries, such as China, in its foreign interference efforts since at least 2020.¹⁰⁶ While the extent of this coordination is considered highly classified by the government, Martin Green, former Assistant Secretary at the Intelligence Assessment Secretariat of the Privy Council Office, acknowledged that increased “strategic cooperation on narratives across the board would create a bigger problem.”¹⁰⁷ As early as 2018, CSIS warned that the “negative impact on democracy of false news could increase if Russia and other actors become role models for others, increasing the distribution of malignant material through all the pathways of the electronic age.”¹⁰⁸ Unfortunately, with China, Iran, India, and a growing number of other countries conducting their own influence campaigns in Canada, this prediction has come true. As Michael Chong testified, Canada has now become a “playground for foreign interference”.¹⁰⁹

Canada’s Failed Attempt to Fight Russian Interference

[44] In the 2016 U.S. presidential election, the Russian regime orchestrated hacking efforts targeting Democratic Party emails, and then leaked them to undermine candidate Hillary Clinton.¹¹⁰ Additionally, the Russian “Internet Research Agency” spread divisive content on social media platforms, aiming to polarize the American electorate and

¹⁰⁴ D Vatcher & J Lacroix, English Interpretation—Day 21, Cr-Ex (Sirois) at 42.

¹⁰⁵ The lack of coordination between U.S. national security agencies and the Democratic National Committee during the Russian “hack and steal” operation in the 2016 presidential election significantly contributed to Russia’s success in interfering with that election: [Report of the Select Committee on Intelligence United States Senate on Russian Active Measures Campaigns and Interference in the 2016 U.S. Election: Counterintelligence Threats and Vulnerabilities](#), vol 5 (Washington: 2020) at 815.

¹⁰⁶ See e.g. Canada, “Part C Institutional Report for the Privy Council Office” (CAN.DOC.000036) at 20; Canada, “Canada’s Strategy for Countering Hostile Activities by State Actors (CAN003249) at 16.

¹⁰⁷ M-H Chayer, B Walshe, N Eldebs, L J Ducharme, M Green & M MacDonald, English Interpretation—Day 29, Cr-Ex (Sirois) at 77.

¹⁰⁸ Canadian Security Intelligence Service, “[Who Said What?: The Security Challenges of Modern Disinformation](#)” (February 2018) at 11.

¹⁰⁹ M Chong, English Interpretation—Day 18, In-Ch (Rodriguez) at 53.

¹¹⁰ [Report of the Select Committee on Intelligence United States Senate on Russian Active Measures Campaigns and Interference in the 2016 U.S. Election: Counterintelligence Threats and Vulnerabilities](#), vol 5 (Washington: 2020); United States, Department of Justice, [Report On The Investigation Into Russian Interference In The 2016 Presidential Election](#) by R S Mueller III, vol 1 (Washington: 2019) at 41.

erode trust in the democratic process.¹¹¹ U.S. intelligence agencies confirmed these efforts.¹¹² Russia deployed a similar “hack and leak” strategy during the 2017 French presidential election but with limited success.¹¹³

[45] These interference attempts prompted the Canadian government, in preparation for the 2019 federal general election, to adopt the *Plan to Protect Canada’s Democracy*, aimed at protecting this election from foreign interference by Russia and other states.¹¹⁴ Key components of this plan are the Critical Election Incident Public Protocol (“CEIPP”)¹¹⁵, the SITE TF,¹¹⁶ the Rapid Response Mechanism (“RRM”), the Digital Citizen Initiative (“DCI”), and increased collaboration with social media platforms.¹¹⁷

[46] Learning from its limited success during the 2017 French election, the Kremlin pivoted from overt “hack and leak” tactics to more subtle, pernicious, and long-term strategies that are harder to detect and counter.¹¹⁸ For the reasons detailed below, the measures comprised in the *Plan to Protect Canada’s Democracy* are inadequate to address this growing and evolving threat from Russia. As Erin O’Toole testified, the government is playing “catch up” against the evolving nature of Russian interference.¹¹⁹ Recent events, like the Tenet Media operation, reveal Canada’s inability to detect, deter, or counter Russian efforts to undermine its democracy and sovereignty. While Minister Joly acknowledged the limited effectiveness of current mechanisms to combat online propaganda in her testimony,¹²⁰ the government as a whole lacks awareness of its own shortcomings, making it unlikely to develop effective tools in time for the next federal general election.

The Critical Election Incident Public Protocol

[47] The incident-based approach at the heart of the CEIPP, while generally appropriate for significant “hack and leak” operations like those seen during the 2016 U.S. and 2017 French elections, is inadequate for addressing the cumulative impact of a series of smaller incidents, over multiple years, and not limited to electoral periods, as is the case with Russian information operations. Individually, these incidents may not significantly impact any given election.¹²¹ However, over time, especially when these narratives are recycled by domestic influencers, media, or

¹¹¹ United States, Department of Justice, [Report On The Investigation Into Russian Interference In The 2016 Presidential Election](#) by R S Mueller III, vol 1 (Washington: 2019) at 24-25.

¹¹² Office of the Director of National Intelligence, [Assessing Russian Activities and Intentions in Recent US Elections](#) (6 January 2017).

¹¹³ R Donadio, “[Why the Macron Hacking Attack Landed With a Thud in France](#)”, *The New York Times* (8 May 2017).

¹¹⁴ [Initial Report](#) at 21.

¹¹⁵ For more information about the CEIPP, see *ibid* at 21, 108-110.

¹¹⁶ For more information about the SITE TF, see *ibid* at 21, 106-108.

¹¹⁷ Government of Canada, “[Canada’s plan to protect democracy](#)” (last modified 22 July 2024). See also Canada, National Security and Intelligence Committee of Parliamentarians, [Special Report on Foreign Interference in Canada’s Democratic Processes and Institutions](#), (tabled June 2024) (Chair: D McGuinty) at 35-38.

¹¹⁸ I Stradner & J Hardie, “Russia” in B Bowman, ed, *Cognitive Combat: China, Russia and Iran’s Information War Against Americans* (Washington DC: FDD Press, 2024) 19 at 21.

¹¹⁹ E O’Toole, English Interpretation—Day 18, Cr-Ex (Sirois) at 186.

¹²⁰ M Joly, Floor Transcript—Day 32, Cr-Ex (Sirois) at 183-84 [*our translation*].

¹²¹ G Eady, T Paskhalis, T Zilinsky et al, “[Exposure to the Russian Internet Research Agency foreign influence campaign on Twitter in the 2016 US election and its relationship to attitudes and voting behavior](#)” (2023) 14:62 *Nature Communications* 1.

politicians, their cumulative impact is greater than the sum of their individual parts. The effect of multi-year and multi-channel propaganda efforts is not well understood nor thoroughly studied, especially in Canada, despite clear recommendations to this effect by the SECU in March 2023 and by the POEC in February 2023.¹²² David Morrison, Deputy Minister of Foreign Affairs testified that the government is learning that “in addition to evaluating whether any one incident constitutes in and of itself foreign interference, one needs to take into account repeated -- if that’s how it plays out -- repeated instances and the corrosive effect that that can have overtime.”¹²³

[48] Further, by its nature, the CEIPP is reactive, created to *respond* to incidents rather than *deter* or *prevent* them. It is impossible to reverse the damage once an information operation has begun—the harm occurs between its initiation and eventual shutdown.¹²⁴ The testimony of Bo Basler, CSIS’s Counter-Foreign Interference Coordinator and Dr. Nicole Giles, CSIS’s Senior Assistant Deputy Minister and Deputy Director for Policy and Strategic Partnerships emphasized the need for Canada’s security agencies to adopt a proactive approach to disinformation, potentially conducting their own information operations.¹²⁵ While Dr. Giles mentioned the use of social media campaigns to raise awareness, it remains unclear to what extent CSIS is conducting its own information operations.¹²⁶

The Security and Intelligence Threats to Elections Task Force

[49] While CSE, a member of the SITE TF, found no campaign from Russia aimed at “affecting the *outcome* of elections” during the last two federal general elections, Alia Tayyeb emphasized that “[t]hey absolutely have the capability of doing so.”¹²⁷ This capability makes Russian interference a “very live intelligence requirement” and “a very high priority” for Canada’s intelligence community.¹²⁸ Unfortunately, although CSE recognizes that “Russia is trying to influence opinion in Canada,”¹²⁹ the CSE does not see the connection this has to the way Canadians vote and engage in politics more generally.¹³⁰ This explains why, just like during the 2019 and 2021 federal general elections, the SITE TF did not detect any significant foreign interference during the last four by-elections, despite the Tenet Media operation.¹³¹

¹²² House of Commons, Standing Committee on Public Safety and National Security, [Up to the Task: Strengthening Canada’s Security Posture in Relation to Russia](#) (March 2023).; Canada, Public Order Commission, [Report of the Public Inquiry into the 2022 Public Order Emergency: Analysis \(Part 2\) and Recommendations](#), vol 3 (Ottawa: Privy Council Office) at 275 ff.

¹²³ P Lafortune, T Denham, C Termorshuizen, D Morrison, W Epp & A Lévêque, English Interpretation—Day 28, Cr-Ex (Sirois) at 187.

¹²⁴ For an article explaining why fact-checking is not an effective response, see T A Harper, “[Fact-Checking Is Not a Political Strategy](#)”, *The Atlantic* (2 October 2024).

¹²⁵ C L Henderson, M Tessier, D Vigneault, V Lloyd, N Giles & B Basner, Floor Transcript—Day 24, Cr-Ex (Sirois) at 233.

¹²⁶ *Ibid* at 234.

¹²⁷ S Khoury, C Xavier & A Tayyeb, Floor Transcript—Day 23, In-Ch (Dann) at 22.

¹²⁸ *Ibid* at 21-22.

¹²⁹ S Khoury, C Xavier & A Tayyeb, Floor Transcript—Day 23, Cr-Ex (Sirois) at 95.

¹³⁰ *Ibid* at 95-96.

¹³¹ CSIS Rep 1, CSIS Rep 2, R Macdonald, R Wettlaufer & G L O’Hayon, Floor Transcript—Day 27, Cr-Ex (Sirois) at 184.

[50] In an attempt to explain why it did not detect the Tenet Media operation, CSIS Representative 1 testified that the SITE TF’s mandate was to address FI to “the extent that it concerns the elections.”¹³² Robin Wettlaufer, Global Affairs Canada’s (“GAC”) representative on the SITE TF from September 2022 until August 2024, testified that “is not clear to us that these were specifically targeting the ridings or electorates in question,”¹³³ and added that the SITE TF is “monitoring particular ridings and things pertaining to those candidates in those by-elections,” not “everything taking place everywhere on the internet.”¹³⁴ CSIS Representative 1 also testified that “political leaders are targeted by hostile countries throughout much of the year as well,” making it challenging to differentiate this type of disinformation from that aimed specifically at the by-elections.¹³⁵

[51] The SITE TF neither considers it to be within its role nor possesses the capability to monitor or counter Russian interference efforts like the Tenet Media operation. Given the way the Russian regime adapted its foreign interference efforts since 2016 as described above, the SITE TF’s reactive and incident-specific way of countering threats renders it largely ineffective. Perhaps even more concerning, the SITE TF creates a false sense of security regarding Russian interference in Canada’s democratic processes and institutions. The SITE TF lacks the perspective to recognize this as a failure and does not see the relevance of conducting an after-action review to understand why it failed to detect, deter or counter this foreign influence campaign during the four by-elections it was supposed to monitor.¹³⁶ This stance sends a troubling signal to Russia: not only are Canadian institutions unable to respond to influence campaigns, but they also appear indifferent to this issue.

[52] The SITE TF also has poor communication with political parties, which are at the forefront of the Russian regime’s interference attempts.¹³⁷ As Lucy Watson, NDP’s National Director, stated: “The NDP finds it worrisome that [the] government does not seem to have tools or a desire to deal with this type of social media manipulation. The party has reported mis/disinformation activity to its SITE contact at PCO but rarely receives status updates. [...] Thus, the NDP questions whether reporting out is of value.”¹³⁸ The Liberal Party is likewise not reporting online disinformation activity to the SITE TF.¹³⁹

¹³² *Ibid* at 185.

¹³³ *Ibid* at 186.

¹³⁴ *Ibid* at 187.

¹³⁵ *Ibid* at 186.

¹³⁶ *Ibid* at 187-88.

¹³⁷ L Watson, English Interpretation—Day 19, Cr-Ex (Sirois) at 132; A Ishmael, A McGrath & W Soliman, Floor Transcript—Day 8, Cr-Ex (Sirois) at 88. See also Canada, National Security and Intelligence Committee of Parliamentarians, [*Special Report on Foreign Interference in Canada’s Democratic Processes and Institutions*](#), (tabled June 2024) (Chair: D McGuinty) at 40-41.

¹³⁸ L Watson & J Calvert, “Interview Summary: New Democratic Party” (WIT0000087) at para 86.

¹³⁹ A Ishmael, Floor Transcript—Day 20, Cr-Ex (Sirois) at 160-61.

The Rapid Response Mechanism

[53] RRM Canada monitors the digital information environment for foreign state-sponsored disinformation, including during federal elections.¹⁴⁰ However, it was unable to detect the Tenet Media operation during the last four by-elections, for reasons similar to the SITE TF's failure: the threat either falls outside RRM Canada's role or it lacks the capacity to detect these types of threats.¹⁴¹ These challenges help explain RRM Canada's failure to seriously consider the reports it received from its contracted partner that highlighted Russian amplification of the PPC during the 2021 general election.¹⁴²

[54] Tara Denham, involved in the creation of RRM Canada, testified that Canada needs to develop its capability to monitor that online environment, recognizing that there "is a real value to understanding the disinformation landscape".¹⁴³ When questioned by Commissioner Hogue about potential reforms to RRM Canada, Minister Joly testified that "in every war, and in every conflict, there is a Ministry of Communications. In some autocratic countries, it's a Ministry of Propaganda. Canada created a very important Ministry of Communications, located not far from here, during the Second World War."¹⁴⁴

The Digital Citizen Initiative

[55] Housed within Canadian Heritage, the DCI aims to "support democracy and social inclusion in Canada by building citizen resilience against online disinformation and building partnerships to support a healthy information ecosystem."¹⁴⁵ So far, the government reports allocating over \$15 million to support 96 projects by various civil society and academic groups focused on building resilience against misinformation. According to the DCI, these projects have reached over 12 million Canadians.¹⁴⁶ Minister Joly testified that Heritage Canada might not be the most suitable department to address foreign interference.¹⁴⁷

[56] The MEO is one of the groups whose principal source of operational funding comes from the DCI.¹⁴⁸ The whole-day testimony of this organization before this Commission of Inquiry offers a useful glimpse into the problems associated with funding third parties to monitoring online content. The MEO is an interdisciplinary collaboration between McGill University and the University of Toronto that studies "media ecosystem health," in order "to understand the dynamics of information production, dissemination, and consumption across digital media with the

¹⁴⁰ Government of Canada, "[Rapid Response Mechanism Canada: Global Affairs Canada](#)" (last modified 3 October 2024).

¹⁴¹ P Lafortune, T Denham, C Termorshuizen, D Morrison, W Epp & A Lévêque, English Interpretation—Day 28, Cr-Ex (Sirois) at 189-91.

¹⁴² [RCDA Submissions \(stage 1\)](#) at 15-16.

¹⁴³ P Lafortune, T Denham, C Termorshuizen, D Morrison, W Epp & A Lévêque, English Interpretation—Day 28, In-Ch (Chaudhury) at 39-40.

¹⁴⁴ M Joly, Floor Transcript—Day 32, In-Ch (Mackay) at 134 [*our translation*].

¹⁴⁵ Government of Canada, "[Digital Citizen Initiative – Online disinformation and other online harms and threats](#)" (last modified 20 March 2023).

¹⁴⁶ *Ibid.*

¹⁴⁷ M Joly, Floor Transcript—Day 32, In-Ch (MacKay) at 134.

¹⁴⁸ P Loewen, T Owen & A Bridgman, English Interpretation—Day 22, In-Ch (Herrera) at 119.

goal of empowering Canadians to navigate the complexities of the modern digital age.”¹⁴⁹ It is the coordinating body of the Canadian Digital Media Research Network (“CDMRN”), a partnership of nine external organizations collaborating to better understand the Canadian media ecosystem, launched in June 2023 with funding from the DCI.¹⁵⁰

[57] In their analyses of the media ecosystem, including during the last two federal general elections, the MEO considers that it requires “a high degree of confidence” that the information is factually untrue to categorize it as disinformation.¹⁵¹ When information is not obviously false, but may be misleading, the MEO considers that, in order to categorize it as foreign interference, it must be able to “ascribe the maliciousness of [the] intent” to the misleading information, which is outside of [its] capacity.”¹⁵² The co-principal investigator at the MEO even recognized that the mandate of this Commission of Inquiry is “very different than the scope of what” the MEO is studying.¹⁵³ In short, the MEO does not have the capacity, nor the mandate to identify or counter Russian interference.

[58] In the words of its co-principal investigator, the MEO was created to “push back against the over-indexing, or the almost fetishization post-2016 in the U.S. of the power of foreign interference to surgically shape our democracy and our information ecosystem”.¹⁵⁴ It is worrying that Canada trusts the MEO with monitoring Canada’s media ecosystem for foreign interference, considering its stated goal of *downplaying* the impact such interference might have on our democracy.

[59] Also worrisome is that private organizations funded through the DCI are not subject to the same accountability and regulations that government actors are subject to, such as the Values and Ethics Code for the Public Sector, the *Conflicts of Interest Act*, RSA 2000, c C-23, and Canada’s Foreign Influence Transparency Registry. Considering that one of the key objectives of FI actors is to control academia,¹⁵⁵ it is troubling that so much relies on a body (the MEO) subject to less accountability and transparency, and that is partially funded by private foundations.¹⁵⁶

[60] Yet the MEO argues for greater independence from the government, contending that, “you do not necessarily want that core data collection centralized within government agencies. It includes a huge amount of private information about citizens.”¹⁵⁷ The RCDA considers it preposterous to suggest that this “huge amount of private information about citizens” is better off in the hands of a private entity with minimal accountability and transparency,

¹⁴⁹ “[About](#)”, MEO.

¹⁵⁰ Government of Canada, “[Government of Canada Working with Civil Society to Strengthen Defences against Online Disinformation](#)” (last modified 7 June 2023).

¹⁵¹ P Loewen, T Owen & A Bridgman, English Interpretation—Day 22, In-Ch (Krongold) at 20.

¹⁵² *Ibid* at 23.

¹⁵³ *Ibid* at 48.

¹⁵⁴ *Ibid*.

¹⁵⁵ See e.g. Canada, National Security and Intelligence Committee of Parliamentarians, [Special Report on Foreign Interference in Canada’s Democratic Processes and Institutions](#), (tabled June 2024) (Chair: D McGuinty) at 45.

¹⁵⁶ A Bridgman, P Loewen & T Owen, “Interview Summary: Media Ecosystem Observatory” (WIT0000089.EN) at 7.

¹⁵⁷ P Loewen, T Owen & A Bridgman, English Interpretation—Day 22, In-Ch (Krongold) at 57.

rather than under governmental control. Academic institutions have repeatedly proven to be ineffective at safeguarding sensitive information.¹⁵⁸

[61] Beyond its governance structure, the MEO has also adopted an “incident-based” approach to address threats.¹⁵⁹ However, as discussed under the Critical Election Incident Public Protocol section, this approach fails to effectively address the Russian regime’s online information operations.¹⁶⁰ It is also worth noting that the MEO is dependent on the federal government for funding, its current contract set to expire at the end of March 2025.¹⁶¹

[62] Finally, there seems to be a disconnect between the work of third parties and that of the government. For example, Alexandre Lévêque, Assistant Deputy Minister - Europe, Arctic, Middle East and Maghreb at GAC did not have access to a highly relevant study from the CDMRN on Russian interference, which seemingly impacted its response to the Tenet Media operation, as discussed below.

[63] The RCDA submits that the DCI’s existence is insufficient to detect and counter Russian interference. Canada must remain directly involved and should only rely on academic and civil society with caution.

Collaboration with Social Media Platforms

[64] A major shortcoming of this Commission of Inquiry is its failure to compel testimony from representatives of social media companies, despite repeated requests from the RCDA since April 2024 to this effect.¹⁶² This Commission of Inquiry’s findings will suffer as a result. This Commission of Inquiry has missed an opportunity to hear from representatives of social media companies on how they think government measures could be improved.

[65] The limited evidence from Stage 2 witnesses on social media companies response mechanisms was not encouraging. For example, Meta and TikTok only banned RT from their platforms in September 2024, after the Tenet Media revelations, despite the Canadian Radio-television and Telecommunications Commission (“CRTC”) banning RT in 2022.¹⁶³ RT is still available in Canada on X and Alphabet platforms. Isabelle Mondou, Deputy Minister of the Canadian Heritage and Thomas Owen Ripley, Associate Assistant Deputy Minister Canadian Heritage’s Cultural

¹⁵⁸ For recent examples, see A Chang, “[Personal information of thousands, including SIDs and bank info, likely exposed in cyberattack: U of Winnipeg](#)”, *CBC News* (4 April 2024); H Solomon, “[Ransomware gang starts leaking data stolen from Quebec university](#)”, *IT World Canada* (4 January 2024); “[Laurentian University confirms some personal data compromised by cyber incident](#)”, *CBC News* (6 March 2024); “[SFU warns cyberattack exposed personal information of about 200,000 students, staff and alumni](#)”, *CBC News* (16 February 2021).

¹⁵⁹ P Loewen, T Owen & A Bridgman, Floor Transcript—Day 22, In-Ch (Krongold) at 104-108. See also Canadian Digital Media Research Network, “Proposal for an Information Incident Research” (CAN035445). For a discussion of that proposal, see P Loewen, T Owen & A Bridgman, English Interpretation—Day 22, In-Ch (Herrera) at 135-40.

¹⁶⁰ P Loewen, T Owen & A Bridgman, Floor Transcript—Day 22, Cr-Ex (Sirois) at 193-94; “[Mis- an Disinformation During the 2021 Canadian Federal Election](#)”, *MEO* (April 2022).

¹⁶¹ A Bridgman, P Loewen & T Owen, “Interview Summary: Media Ecosystem Observatory” (WIT0000089.EN) at 9, 18.

¹⁶² Notably, the RCDA filed a formal application (*Application to Revisit the Commission’s Initial Report, Conduct Certain Investigative Steps and to Hold Certain Public Hearings*)

¹⁶³ K Paul, “[Meta bans Russian state media for ‘foreign interference’](#)”, *Reuters* (12 September 2024); D Ingram, “[TikTok removes Russian state media outlets RT and Sputnik, citing ‘covert influence operations’](#)”, *NBC News* (23 September 2024).

Affairs Sector, acknowledged that the social media companies' decision to ban or not to ban RT is ultimately a "business decision."¹⁶⁴

[66] Lucy Watson testified that the NDP was essentially on its own to deal with foreign interference online: "the onus is on us to identify those posts, to make the argument as to why it should be removed, and then to follow up on the status of Meta's decision making."¹⁶⁵ According to Lucy Watson, social media companies are not responding promptly (if at all) to complaints about foreign interference on their platforms. Lucy Watson testified that Meta takes five to ten days to respond to complaints about possible foreign interference, such as by removing an account or a post. She qualified this delay as "highly problematic," especially considering that an inauthentic post or account can exist for "some weeks or months" before it is first noticed by the NDP.¹⁶⁶ Lucy Watson added that even if it's removed by Meta, there is a "high" probability that other social media accounts have replicated and recirculated the post.¹⁶⁷

[67] Lucy Watson also criticized the lack of transparency surrounding these inauthentic posts: "We have no idea how long they've been in circulation. We have no idea how many views they have received. We have no idea how many times they have been copied and forwarded."¹⁶⁸ This is not just a problem for political parties. According to Prof. Aengus Bridgman, Director of the MEO, "there's been a precipitous decline in access" to the application programming interfaces of Facebook, X, and other platforms, even for non-government experts.¹⁶⁹

A "Whole-of-Government" Failure

[68] Canada's "whole-of-government approach"¹⁷⁰ to foreign interference created gaps in its response to these threats, as departments and agencies assumed they are not responsible for addressing specific instances of Russian interference. When foreign actors successfully interfere in Canada's democratic institutions, there is a lack of accountability as no government actor sees itself as having the ultimate responsibility of detecting, deterring and countering this foreign interference, as acknowledged by Rob Stewart, Deputy Minister of Public Safety between December 2019 and October 2022.¹⁷¹ The creation of the Foreign Interference Coordinator in March 2023 did not resolve this problem, and the classified Counter-Foreign Interference Strategy remains at a "nascent stage".¹⁷² In any event, the newly appointed coordinator does not consider himself to be ultimately accountable for when foreign

¹⁶⁴ A Awad, O Ripley & I Mondou, Floor Transcript—Day 29, Cr-Ex (Sirois) at 177-78.

¹⁶⁵ *Ibid* at 138.

¹⁶⁶ L Watson, English Interpretation—Day 19, Cr-Ex (Sirois) at 135.

¹⁶⁷ *Ibid* at 136.

¹⁶⁸ *Ibid*.

¹⁶⁹ P Loewen, T Owen & A Bridgman, Floor Transcript—Day 22, In-Ch (Krongold) at 97-100; Canada, "New Impediments to Counter Foreign Disinformation Online" (CAN024072).

¹⁷⁰ See e.g. Initial Report at 20.

¹⁷¹ D Rochon & R Stewart, English Interpretation—Day 30, Cr-Ex (Sirois) at 73.

¹⁷² Canada, "Deputy Minister's Committee on China" (CAN030915_0001) at 3; S Aubertin-Giguère, S Tupper & T Geddes, English Interpretation—Day 30, In-Ch (Dann) at 113-14.

interference occurs in Canada.¹⁷³ The Foreign Interference Coordinator does not even consider the government to have failed in its response to the Tenet Media operation.¹⁷⁴

[69] The Foreign Interference Coordinator was not surprised nor concerned that a study partially funded by Canadian Heritage to better understand the impact of Russian interference had not been communicated to Alexandre Lévêque at GAC, although he acknowledged that it would have been “good” for him to read it.¹⁷⁵ Such studies are funded by the government to help policy development about Russian interference; as Isabelle Mondou testified: “Of course, with information, evidence, and data, it truly helps us guide our actions.”¹⁷⁶

[70] Although David Vigneault acknowledged that he did not conduct a study as extensive as that of DisinfoWatch, he affirmed it is “credible to believe” that such Russian tactics are affecting Canada directly.¹⁷⁷ However, Alexandre Lévêque disagreed with the conclusions of this analysis, which he had not seen prior to his testimony, and cited his “personal experience,” “anecdotal or scientific information,” and “surveys” to suggest that Canadians are relatively resilient to Russian propaganda.¹⁷⁸ This is only one of many examples of a clear disconnect between the assessments of Canada’s national security agencies, academia, and civil society (largely funded by Canadian Heritage) on one side, and GAC on the other—a gap that the newly appointed Foreign Interference Coordinator has seemingly been unable to bridge.¹⁷⁹ This lack of accountability and the gaps in the government’s responses are key problems in the handling of foreign interference. No entity within government has taken responsibility for the numerous interference attempts by Russia over the past several years, including the Tenet Media operation.

[71] Despite some attempts, the government and its agencies are unable to effectively control the Kremlin’s toxic narratives. For example, although the CRTC regulates “false or misleading news”¹⁸⁰ there are serious shortcomings in its approach to control the Russian regime’s information operations. For instance, the CRTC decided to ban RT only in 2022, after significant political pressure,¹⁸¹ a formal request from the Governor in Council pursuant to section 15 of the *Broadcasting Act*, and after all distributors had already stopped airing RT of their own initiative.¹⁸² Additionally, two other Russian propaganda channels, RTR Planeta and Channel 1 Russia, remain on the regulator’s

¹⁷³ S Aubertin-Giguère, S Tupper & T Geddes, Floor Transcript—Day 30, Cr-Ex (Sirois) at 153.

¹⁷⁴ *Ibid* at 155.

¹⁷⁵ *Ibid* at 159. See also “[Canadian Vulnerability to Russian Narratives About Ukraine](#)”, *DisinfoWatch* (8 July 2024).

¹⁷⁶ A Awad, O Ripley & I Mondou, Floor Transcript—Day 29, Cr-Ex (Sirois) at 169 [our translation].

¹⁷⁷ C L Henderson, M Tessier, D Vigneault, V Lloyd, N Giles & B Basner, Floor Transcript—Day 24, Cr-Ex (Sirois) at 229.

¹⁷⁸ P Lafortune, T Denham, C Termorshuizen, D Morrison, W Epp & A Lévêque, English Interpretation—Day 28 Cr-Ex (Sirois) at 194.

¹⁷⁹ S Aubertin-Giguère, S Tupper & T Geddes, Floor Transcript—Day 30, Cr-Ex (Sirois) at 156-59.

¹⁸⁰ *Television Broadcasting Regulations, 1987*, SOR/87-49, s 5(1); S Shortliffe, English Interpretation—Day 25, Cr-Ex (Sirois) at 150; A Awad, O Ripley & I Mondou, Floor Transcript—Day 29, Cr-Ex (Sirois) at 173.

¹⁸¹ O’Toole first called for the removal of RT’s propaganda and misinformation efforts in or around 2018–19, see E O’Toole, English Interpretation—Day 18, Cr-Ex (Sirois) at 187.

¹⁸² [Review of the authorization to distribute Russia Today \(RT\) and RT France pursuant to the List of non-Canadian programming services and stations authorized for distribution](#) (16 March 2022), 2022-68 CRTC at para 48; S Shortliffe, English Interpretation—Day 25, Cr-Ex (Sirois) at 150.

list of services and stations authorized for distribution,¹⁸³ even though the Central and Eastern European Council of Canada presented significant concerns about these channels to the CRTC during the hearing regarding whether to ban RT.¹⁸⁴ In any event, RT remains accessible online, as the CRTC lacks authority to regulate Internet content.¹⁸⁵ RT content is also made accessible in Canada through other media channels, such as Cubavisión Internacional.¹⁸⁶ Minister Joly testified about her doubts that the CRTC can effectively respond to foreign interference campaigns, including a campaign from RT.¹⁸⁷

[72] Neither the Chief Electoral Officer nor the Commissioner of Canada Elections have the mandate or capacity to monitor the Kremlin’s narratives and efforts to infiltrate Canada’s democratic institutions. While the Chief Electoral Officer monitors social media for false or misleading information about the “electoral process and [to ensure] voters have correct information about how to vote,” this only captures a small fraction of the threat posed by the Russian regime’s information operations.¹⁸⁸

[73] On the diplomatic front, the government is severely limited in its ability to retaliate against the Russian regime’s interference activities, notably due to a significant imbalance in diplomats stationed in Moscow compared to Ottawa.¹⁸⁹ As a result, the government, has not expelled any Russian diplomats since 2018.¹⁹⁰ GAC did not even formally *meet* with the Russian embassy to condemn the Tenet Media operation.¹⁹¹ This is particularly troubling considering that, according to a 2023 CSIS assessment, the Russian regime relies “primarily on diplomatic mission-based personnel to carry out intelligence and FI activities in Canada.”¹⁹² Minister Joly recognized that the “Vienna Convention is not currently equipped to handle the issue of online disinformation.”¹⁹³ Sanctions are another tool available to Canada; however, foreign interference is not one of the “circumstances” that can trigger the use of sanctions.¹⁹⁴ Also, even though RT has been designated as a sanctioned entity since 2022, its operatives helped establish and run Tenet Media for nearly a year following this designation¹⁹⁵

¹⁸³ Canada, “Broadcasting Regulatory Policy CRTC 2024-1” (CRT0000025).

¹⁸⁴ [Review of the authorization to distribute Russia Today \(RT\) and RT France pursuant to the List of non-Canadian programming services and stations authorized for distribution](#) (16 March 2022), 2022-68 CRTC at para 48; S Shortliffe, English Interpretation—Day 25, Cr-Ex (Sirois) at 155.

¹⁸⁵ S Shortliffe, English Interpretation—Day 25, Cr-Ex (Sirois) at 153-54.

¹⁸⁶ “Entrevista especial de Russia Today” (HRC0000129), S Shortliffe, English Interpretation—Day 25, Cr-Ex (Teich) at 172.

¹⁸⁷ M Joly, Floor Transcript—Day 32, In-Ch (Mackay) at 134.

¹⁸⁸ Commissioner of Canada Elections, “Undertakings Given March 28, 2024” (COM0000348) at 3, RCDA Submissions (stage 1) at 13-14. S Perrault & S Caron, “Interview Summary” (WIT0000020.EN) at 94-95.

¹⁸⁹ J Trudeau, Floor Transcript—Day 35, Cr-Ex (Doody) at 155.

¹⁹⁰ B Clow, K A Telford & P Travers, Floor Transcript—Day 34, Cr-Ex (Sirois) at 96.

¹⁹¹ P Lafortune, T Denham, C Termorshuizen, D Morrison, W Epp & A Lévêque, Floor Transcript—Day 28, Cr-Ex (Sirois) at 195.

¹⁹² Canada, “2023 Threat Summary Report” (CAN023184). See also MI5, “[Director General Ken McCallum gives latest threat update](#)” (8 October 2024).

¹⁹³ M Joly, Floor Transcript—Day 32, In-Ch (Mackay) at 137 [*our translation*].

¹⁹⁴ *Special Economic Measures Act*, SC 1992, c 17, s 4; P Lafortune, T Denham, C Termorshuizen, D Morrison, W Epp & A Lévêque, Floor Transcript—Day 28, Cr-Ex (Sirois) at 200.

¹⁹⁵ Government of Canada, “[Background: RT’s hostile activities](#)” (last modified 13 September 2024).

[74] The RCDA is not aware of any significant actions the government took against the Russian regime or its proxies for their influence operations in Canada. In the limited times Russian information operations have prompted a response from the Canadian government, it came in the form of public statements by ministers (like the statements issued by Minister Joly¹⁹⁶ and Minister LeBlanc¹⁹⁷ following the Tenet Media allegations), but these reactions do not deter the Russian regime from pursuing nefarious activities.¹⁹⁸ To effectively respond to the complex and evolving tactics now employed by the Russian regime, the strategies developed in response to 2016-style interference are insufficient. The *Plan to Protect Canada's Democracy*, alongside the “whole-of government” approach and various *ad hoc* departmental measures, fall short of addressing the scope and sophistication of current threats.

The Consequences for Canada's Democracy

[75] The Russian regime's actions, and the Canadian government's inability to detect, deter and counter them, have profound impacts on Canada's democracy—impacts that the government and the public are only beginning to fully recognize and understand.

Russian Disinformation Poses a Growing Threat to Canadian Democracy and Social Stability

[76] The Russian regime's use of social media platforms as a tool for disruption exacerbates the nefarious consequences these platforms have on Canada's democracy.¹⁹⁹ While both the SECU and POEC recommended further studies to quantify the scope and impact of the Russian regime's influence operations, the RCDA believes this is not a necessary step to recognize the severe consequences already at play, and further delays could limit Canada's ability to respond. Enough is already known to take serious actions now.

[77] The Canadian government acknowledges that “Russian disinformation impacts Canadians.”²⁰⁰ Minister Joly testified that “Canada should not think that we are immune to [Russian influence]. On the contrary.”²⁰¹ She added that “It even affects the social fabric. People don't get along with each other, between neighbors, even within families. That's why it's corrosive. That's why I used the term earlier; it's like gangrene.”²⁰² Marco Mendicino, Minister of Public Safety during the “Freedom Convoy” testified that Russian disinformation “can undermine our democracy if it's allowed to spread unchecked.”²⁰³ Bo Basler highlighted that disinformation threatens the “fabric of society” and the “trust in institutions or in governments”.²⁰⁴ Nathalie Drouin, Deputy Clerk of the Privy Council Office and

¹⁹⁶ Government of Canada, “[Statement by Minister Joly on Russian Interference](#)” (13 September 2024).

¹⁹⁷ Government of Canada, “[Statement by the Minister of Public Safety, Democratic Institutions and Intergovernmental Affairs on U.S. action regarding Russian influence operations](#)” (5 September 2024).

¹⁹⁸ “[Russia's RT will continue to work in the West, editor says](#)”, *Reuters* (8 September 2024).

¹⁹⁹ See e.g. P Loewen, T Owen & A Bridgman, English Interpretation—Day 22, Cr-Ex (Sirois) at 197. See also World Economic Forum, “The Global Risks Report 2024: 19th ed” (RCD0000061) at 18-21; Canada, “Disruptions on the Horizon: 2024 Report” (RCD0000053) at 14.

²⁰⁰ Government of Canada, “[Russia's use of disinformation and information manipulation](#)” (last modified 28 February 2024).

²⁰¹ M Joly, Floor Transcript—Day 32, Cr-Ex (Sirois) at 183 [*our translation*].

²⁰² *Ibid* [*our translation*].

²⁰³ M Mendicino, English Interpretation—Day 32, Cr-Ex (Sirois) at 64.

²⁰⁴ C L Henderson, M Tessier, D Vigneault, V Lloyd, N Giles & B Basner, Floor Transcript—Day 24, Cr-Ex (Sirois) at 233.

National Security and Intelligence Advisor to the Prime Minister testified about an “upward trend in the number of Canadians who would be comfortable operating under an autocratic country or leadership [and] a growing number of Canadians who believe that the situation in Ukraine is caused by Ukraine itself.”²⁰⁵ Nathalie Drouin emphasized that this clearly demonstrates the impact of Russian disinformation campaigns.²⁰⁶ David Vigneault testified that the Russian regime has developed psychological warfare techniques that remain impactful in Canada today, describing the Russian regime as “very, very strong” in this area.²⁰⁷

[78] Svetlana Koshkareva testified that Canadians are “already starting to witness the effects of [Russian] cognitive warfare through the decline in support to the war in Ukraine, increasing social division, and eroding trust in our institution [*sic*].”²⁰⁸ Even more troubling is that the primary victims of this cognitive warfare are members of the Russian diaspora, especially those who defend democratic values.²⁰⁹

[79] A Léger poll commissioned by Elections Canada delivered in April 2024 reveals that Canadians not only share concerns about online foreign influence campaigns, but are also increasingly alarmed by their impacts.²¹⁰ The same poll shows a steady decline, between April 2021 and March 2024, in Canadians’ trust in the media, in public institutions and in the perception that voting is safe and reliable.²¹¹ Further, a Statistics Canada study from December 2023 shows that 59% of Canadians said they were very or extremely concerned about any type of misinformation online, and 43% felt it was getting harder to decipher online truth from fiction compared with three years earlier.²¹²

[80] A joint analysis from DisinfoWatch and the CDMRN published in July 2024 shows that most Canadians have been exposed to the Russian regime’s information manipulations and interference narratives, and a substantial portion of those exposed either believe them or are unable to assess if the information is true or false.²¹³ There is also a marked difference along political lines in one’s susceptibility to Russian disinformation: Conservative supporters are more likely to be both exposed and to believe Kremlin disinformation narratives than their Liberal and NDP counterparts, for example.²¹⁴

²⁰⁵ D Rogers, N G Drouin; J Hannaford, J H Thomas & J Charette, Floor Transcript—Day 31, Cr-Ex (Sirois) at 137 [*our translation*].

²⁰⁶ *Ibid.*

²⁰⁷ C L Henderson, M Tessier, D Vigneault, V Lloyd, N Giles & B Basner, Floor Transcript—Day 24, Cr-Ex (Sirois) at 229 [*our translation*].

²⁰⁸ Panel on Public Awareness and Education, English Interpretation—Day 26, (McGrann & Herrera) at 84.

²⁰⁹ *Ibid* at 82; J Hannaford, N G Drouin, D Rogers, J Charette, J Thomas & S de Boer, “Interview Summary: Privy Council Office” (WIT0000116) at 17; Canada, “Moscow’s War in Ukraine: Implications for Russian FI Activities in Canada” (CAN033122_0001).

²¹⁰ Léger Marketing Inc, “[Public Opinion Research Study on Electoral Matters – Wave 4](#)”, *Elections Canada* (2024) at 17.

²¹¹ For example, trust in Elections Canada, the federal government and the mainstream media decreased from 78% to 69%, 54% to 45% and 55% to 49%, respectively. The perception that voting is safe and reliable declined from 74% to 63%. *Ibid* at 26-27 and 31.

²¹² Statistics Canada, “[Concerns with misinformation online, 2023](#)” (20 December 2023).

²¹³ “[Canadian Vulnerability to Russian Narratives About Ukraine](#)”, *DisinfoWatch* (8 July 2024).

²¹⁴ *Ibid.*

Russian Disinformation Threatens the Integrity of Canadian Elections: Sustained Interference Shifts Voter Sentiment and Undermines Political Stability

[81] Prof. Bridgman testified that false or misleading narratives online are “enormously impactful” among highly active, fringe online communities, where “online radicalization is absolutely a phenomena,” driving political discourse through a “non-trivial percentage” of individuals who are “very militant and very involved,” while the inattentive majority remains susceptible to false information.²¹⁵ Lucy Watson testified that the foreign interference activity experienced by her party has a “really profound impact” on the political landscape.²¹⁶

[82] The RCDA’s Stage 1 submissions detail the impact of Russian interference on the last two general elections, and evidence presented during the Stage 2 proceedings only further confirmed these findings.²¹⁷ More recently, the Liberal Party lost four by-elections, two of them by narrow margins in ridings considered Liberal strongholds.²¹⁸ Prime Minister Trudeau continues to be a primary target of Russian smearing campaigns and is currently facing internal revolt within his party.²¹⁹ Azam Ishmael testified that there was some degree of success to the Russian regime’s disinformation campaigns and that he believes they are strengthening the growing opposition against the Liberal Party of Canada.²²⁰ Minister Joly testified that Russia’s amplification of social discontent has far-reaching impacts, affecting not only society but also the elected government.²²¹ Those are clear illustrations of the cumulative effects of this decade-long Russian influence campaign on the ruling party.

[83] Although the SITE TF did not want to admit to its failures and recognize that the by-elections were compromised, Robin Wettlaufer did concede that Canada’s adversaries “wouldn’t invest in it if they didn’t think that it could be impactful.”²²² Although information about the Kremlin’s spending is limited, reporting shows the Kremlin’s investments in foreign interference and propaganda is significant.²²³ The Russian regime spent 10 million U.S. dollars on the Tenet Media operation alone.

Russian Propaganda Threatens Canada’s Foreign Policy

[84] Erin O’Toole testified that “Russian propaganda with respect to the war in Ukraine has eroded in some areas support for Ukraine, which is a very important ally and Canada should -- and our allies should be doing more.”²²⁴ He

²¹⁵ P Loewen, T Owen & A Bridgman, English Interpretation—Day 22, In-Ch (Krongold) at 33.

²¹⁶ L Watson, English Interpretation—Day 19, Cr-Ex (Sirois) at 137.

²¹⁷ See e.g. [RCDA Submissions \(stage 1\)](#) at para 47.

²¹⁸ J P Tasker, “[Bloc Québécois win longtime Liberal seat and deliver stunning blow to Trudeau in Montreal byelection](#)”, *CBC News* (16 September 2024).

²¹⁹ L Cecco, “[Trudeau facing ‘iceberg revolt’ as calls grow for embattled PM to step down](#)”, *The Guardian* (29 October 2024).

²²⁰ A Ishmael, English Interpretation—Day 20, Cr-Ex (Sirois) at 172-73.

²²¹ M Joly, Floor Transcript—Day 32, Cr-Ex (Sirois) at 182.

²²² CSIS Rep 1, CSIS Rep 2, R Macdonald, R Wettlaufer & G L O’Hayon, Floor Transcript—Day 27, Cr-Ex (Sirois) at 191.

²²³ “[U.S. Says Russia Has Spent \\$300 Million To Influence Elections In Dozens of Countries](#)”, *RFE/RL* (13 September 2022); A Michałowska-Kubś & J Kubś, “[Kremlin spent 1.9 billion USD on propaganda last year, the budget exceeded by a quarter](#)”, *Debunk.org* (4 May 2023).

²²⁴ E O’Toole, English Interpretation—Day 18, Cr-Ex (Sirois) at 186.

added that Russian propaganda can impact “the public mood and the policy direction more than the election day, nominations or things that we’ve seen in other foreign interference,”²²⁵ and that “in some cases, these are multi-decade propaganda tools of Russia and we’re only now really catching up to their impact on our debates.”²²⁶ Recent data shows that an increasing number of Canadians, especially Conservative voters, believe Canada is doing too much to assist Ukraine in its fight against the Russian invasion.²²⁷

Work of Parliamentarians and Political Parties

[85] Lucy Watson testified that online rhetoric amplified by foreign interference could lead to real life violence or threats against members of Parliament and political leaders.²²⁸ She also testified that foreign actors, through coordinated and complex social media campaigns, are impeding or influencing the NDP’s reach on social media.²²⁹ Further, the Russian regime leans into emerging populist trends in democracies to promote chaos and division. As Prime Minister Trudeau testified, “certain parties’ statements are often more likely to be amplified by Russia. Some disinformation elements promoted by Russia are also amplified by certain political actors.”²³⁰ This trend exists not only at the federal level, but across all levels of government.

Technological Advancements Pose a Growing Threat

[86] Technological advancements, particularly generative artificial intelligence which enables the large-scale, low-cost generation of text, images, and videos, intensify the threat posed by online foreign interference.²³¹ A February 2024 SITE TF update explains that: “[t]echnological advancements in generative AI will enhance foreign interference efforts, since it aims to control narratives, shape public opinion and/or discredit factual information,” and that influence campaigns leveraging generative artificial intelligence “have the potential to be highly effective and can be a major tool of FI in upcoming elections in Canada.”²³²

Charter Considerations Should Motivate, Not Impede, Serious Measures

[87] Some witnesses and experts caution against regulating the online sphere for fear of limiting the freedom of expression guarantees provided by the *Charter* and they expressed a reluctance to position the government as an “arbiter of truth.”²³³ However, where objective truth exists, it should be stated and amplified by all actors—especially

²²⁵ *Ibid* at 187.

²²⁶ *Ibid* at 188.

²²⁷ [“Ukraine Invasion: Canadian attention, and Conservative support, plummets two years into conflict”](#), *Angus Reid Institute* (6 February 2024).

²²⁸ L Watson, English Interpretation—Day 19, Cr-Ex (Sirois) at 132-33; H Cabrera, [“NDP Leader Jagmeet Singh confronts protesters after being heckled outside Parliament”](#), *CBC News* (17 September 2024).

²²⁹ L Watson, English Interpretation—Day 19, Cr-Ex (Sirois) at 134.

²³⁰ J Trudeau, Floor Transcript—Day 35, Cr-Ex (Sirois) at 165 [*our translation*].

²³¹ See e.g. P Loewen, T Owen & A Bridgman, English Interpretation—Day 22, In-Ch (Krongold) at 34.

²³² Canada, “SITE Threat Assessment of Foreign Interference Threats to Canadian Democratic Institutions – 2024” (CAN037690_0001).

²³³ See e.g. P St-Onge, English Interpretation—Day 33, In-Ch (MacKay) at 116.

the government, which has the knowledge, resources, and arguably the most to lose should it fail to effectively combat the threat posed by these false narratives. A key example of this is GAC’s web page titled *Countering disinformation with facts - Russian invasion of Ukraine*, which aims to expose the “many lies by the Russian regime about its invasion of Ukraine, along with the truth.”²³⁴ As of the time of drafting these submissions, that page displayed 116 lies from the Russian regime, for example “Russia claims that NATO is a threat to Russia,” accompanied by the truth, such as: “NATO is a defensive Alliance that does not seek confrontation.”²³⁵

[88] The Russian regime does not disseminate lies only to justify its invasion of Ukraine. It uses the same strategy to target domestic incidents in Canada as well. For example, “Freedom Convoy protesters were described by RT as ‘demonized’ and said to have had their ‘human rights violated.’”²³⁶ RT further described their arrest as a “crackdown” and the Canadian government as a “dictatorship”²³⁷ Tenet Media influencers promoted similar lies, like the idea that “Canada is becoming a communist hellhole.”²³⁸ These narratives are objectively false or clearly misleading and should be denounced as such. Both David Morrison and Tara Denham acknowledged the importance of providing facts to counter false narratives and recognized that the government has a role to play.²³⁹

[89] Russian information operations are meticulously designed to exploit openness in free and democratic societies and turn these strengths into vulnerabilities. For instance, the Russian regime can capitalize on Canada’s constitutional protections, such as freedom of expression, and claim that the Canadian government is suppressing *Charter* protections whenever it attempts to curb Russian propaganda. However, these *Charter* protections should motivate the government to address this threat. Freedom of expression notably “permits the best policies to be chosen from among a wide array of proffered options [and] helps to ensure that participation in the political process is open to all persons.”²⁴⁰ The right to vote includes the right to exercise one’s vote in an informed manner.²⁴¹ Both cannot be truly exercised in an information ecosystem influenced by foreign states or polluted with Russian propaganda. Russian disinformation during or between elections also undermines this right. Section 15 of the *Charter* should also motivate the government to act, because the Russian diaspora, and the diaspora of nations previously under Soviet rule, are disproportionately affected by Russian interference.²⁴²

²³⁴ Government of Canada, “[Countering disinformation with facts – Russian invasion of Ukraine](#)” (last modified 23 August 2024).

²³⁵ *Ibid.*

²³⁶ C Orr Bueno, “Russia’s Role in the Far-Right Truck Convoy: An Analysis of Russian State Media Activity Related to the 2022 Freedom Convoy” (RCD0000060) at 7.

²³⁷ *Ibid.*

²³⁸ “Tenet YouTube videos” (RCD0000020).

²³⁹ P Lafortune, T Denham, C Termorshuizen, D Morrison, W Epp & A Lévêque, English Interpretation—Day 28, Cr-Ex (Sirois) at 185-88.

²⁴⁰ *R v Keegstra*, [1990] 3 SCR 697 at 763-64.

²⁴¹ *Thomson Newspapers Co v Canada (AG)*, [1998] 1 SCR 877 at paras 82-84.

²⁴² See e.g. [Review of the authorization to distribute Russia Today \(RT\) and RT France pursuant to the List of non-Canadian programming services and stations authorized for distribution](#) (16 March 2022), 2022-68 CRTC.

[90] However, as stated by Richard Moon in a paper commissioned by the POEC about freedom of expression in 2022: “The principal threat to public discourse then may no longer be censorship, and state censorship in particular, but rather the spread of disinformation (within a fragmented public sphere) that undermines agreement on factual matters, and trust in different sources of information or knowledge.”²⁴³ Richard Moon reached this conclusion seemingly without knowing that the Russian regime was behind much of the amplification and disinformation surrounding the “Freedom Convoy” and the subsequent invocation of the *Emergencies Act*.²⁴⁴ In any event, *Charter* protections are not absolute and can, in fact, be enhanced by regulating the online sphere.²⁴⁵

[91] Deputy Minister of Justice Curtis-Micallef recognized that legislating “surreptitious, deceptive, covert activity that is false being disseminated by foreign entities” can allow Canadians “to have the opportunity to participate fully in a fair process and to participate fully in our democracy.”²⁴⁶ Lucy Watson testified that voters have an interest in having access to a safe and healthy media ecosystem free from disinformation and foreign interference, and she emphasized how this can help inform voters.²⁴⁷ She considers that the government has a responsibility to protect the media ecosystem, including through the creation of an “independent social media watchdog and for legislation to bring greater transparency around social media companies’ algorithms.”²⁴⁸

[92] While legitimate concerns exist about the government acting as the arbiter of truth in online content, *ad hoc* measures aimed at controlling online speech already exist in Canada. For instance, the CRTC regulates “false or misleading news”²⁴⁹ and banned RT from Canadian airwaves.²⁵⁰ RRM Canada publishes a list of false narratives about the war in Ukraine along with explanations to debunk these lies²⁵¹ and it monitors social media during elections for foreign interference.²⁵² Heritage Canada grants millions of dollars to non-profit organizations to try to monitor and debunk misinformation and disinformation online, including about the war in Ukraine.²⁵³ Private social media companies regularly ban accounts and news outlets that violate their policies.²⁵⁴ However, because these measures

²⁴³ R Moon, “[Commissioned Paper: Freedom of Expression](#)”, *Public Order Emergency Commission* (September 2022).

²⁴⁴ C Orr Bueno, “Russia’s Role in the Far-Right Truck Convoy: An Analysis of Russian State Media Activity Related to the 2022 Freedom Convoy” (RCD0000060).

²⁴⁵ Government of Canada, “[Bill C-63: An Act to enact the Online Harms Act, to amend the Criminal Code, the Canadian Human Rights Act and An Act respecting the mandatory reporting of Internet child pornography by persons who provide an Internet service and to make consequential and related amendments to other Acts](#)”, Charter Statement (tabled 30 May 2024).

²⁴⁶ S Curtis-Micallef & H Watts, English Interpretation—Day 23, Cr-Ex (Sirois) at 233.

²⁴⁷ L Watson, English Interpretation—Day 19, Cr-Ex (Sirois) at 138.

²⁴⁸ *Ibid* at 139.

²⁴⁹ *Television Broadcasting Regulations, 1987*, SOR/87-49, s 5(1); S Shortliffe, English Interpretation—Day 25, Cr-Ex (Sirois) at 150; A Awad, O Ripley & I Mondou, Floor Transcript—Day 29, Cr-Ex (Sirois) at 173.

²⁵⁰ [Review of the authorization to distribute Russia Today \(RT\) and RT France pursuant to the List of non-Canadian programming services and stations authorized for distribution](#) (16 March 2022), 2022-68 CRTC.

²⁵¹ Government of Canada, “[Countering disinformation with facts – Russian invasion of Ukraine](#)” (last modified 23 August 2024).

²⁵² Government of Canada, “[Rapid Response Mechanism: Global Affairs Canada](#)” (last modified 3 October 2024).

²⁵³ Government of Canada, “[Digital Citizen Contribution Program](#)” (last modified 16 May 2024).

²⁵⁴ “[Why should Zuckerberg decide what news Indians watch, asks Sputnik India after Meta bans Insta account](#)”, *Firstpost* (17 September 2024); D Ingram, “[TikTok removes Russian state media outlets RT and Sputnik, citing ‘covert influence operations’](#)”, *NBC News* (23 September 2024).

are unstructured and sometimes haphazard—sometimes by actors less accountable or transparent than the Canadian government—they are much less effective to detect, deter and counter foreign interference than a robust strategy to regulate online platforms.²⁵⁵ The process used by the CRTC to ban RT on Canadian airwaves illustrates a way to monitor and control corrosive content, while upholding *Charter* protections and the interests of stakeholders.²⁵⁶ Regulating online activity without regulating “user-generated” content is also possible and perhaps less controversial, as illustrated by the *Online Streaming Act* (Bill C-11) and the *Online News Act* (Bill C-18).²⁵⁷

Canada Needs to Do More, Now

As outlined in these submissions, there are so many gaps and issues with the government’s response to Russian interference that it would be impossible for the RCDA, with its limited time and resources, to provide detailed recommendations regarding each problem in the government’s response to Russian interference. Notably, the government must (1) Hold digital platforms accountable for their content by regulating foreign interference online; (2) Create a Ministry of Communications to respond effectively to the Russian regime’s cognitive war; as suggested by Minister Joly;²⁵⁸ (3) Reform protocols for election interference by moving beyond an incident-based approach to address the cumulative impact of long-term, multi-channel propaganda campaigns; (4) Strengthen and develop capabilities to conduct information operations projecting Canada’s interests in the information domain globally, including in the Global South and among Russian-speaking communities, such as by supporting pro-democracy Russian media and communities, promoting Canadian values, exposing the Russian regime’s corruption and the costs of its actions to Russian citizens;²⁵⁹ (5) Close the “dirty dozen” loopholes that allow secret foreign interference;²⁶⁰ (6) Examine the widespread breadth of Russian information operations that target Canada, and examine their impacts as recommended by SECU;²⁶¹ (7) Enhance efforts to build cognitive resilience, media literacy, and a healthier media environment; and (8) Respond proactively to the Russian regime’s actions notably by imposing consequences for interference operations, making it clear that meddling in Canada’s democracy will not be tolerated.

²⁵⁵ See e.g. E Douek, “[The Free Speech Blind Spot: Foreign Election Interference on Social Media](#)” in J D Ohlin & D B Hollis, eds, *Defending Democracies: Combating Foreign Election Interference in a Digital Age* (Oxford: OUP 2021) 265.

²⁵⁶ K Nielsen, “[How to respond to disinformation while protecting free speech](#)”, *Reuters Institute for the Study of Journalism* (19 February 2021).

²⁵⁷ A Awad, O Ripley & I Mondou, Floor Transcript—Day 29, Cr-Ex (Sirois) at 174; Government of Canada, “[Online Streaming Act](#)” (last modified 27 November 2023); P Loewen, T Owen & A Bridgman, English Interpretation—Day 22, In-Ch (Krongold) at 27.

²⁵⁸ M Joly, Floor Transcript—Day 32, In-Ch (MacKay) at 134.

²⁵⁹ Melanie Joly testified that Canada should follow that strategy, noting that Canada was already conducting some information operations, see M Joly, Floor Transcript—Day 32, Cr-Ex (Sirois) at 185-90. See also Panel on Public Awareness and Education, English Interpretation—Day 26 (McGrann & Herrera) at 86 (testimony of Svetlana Koshkareva); I Stradner & J Hardie, “Russia” in B Bowman, ed, *Cognitive Combat: China, Russia and Iran’s Information War Against Americans* (Washington DC: FDD Press, 2024) 19 at 25; J Clinton, “[BBC World Service retreat ‘helping Russia and China push propaganda’](#)”, *The Guardian* (13 October 2024).

²⁶⁰ Bradford, “[Hogue Inquiry largely ignoring ‘dirty dozen’ loopholes that allow for secret foreign interference](#)”, *Democracy Watch* (23 September 2024).

²⁶¹ House of Commons, Standing Committee on Public Safety and National Security, [Up to the Task: Strengthening Canada’s Security Posture in Relation to Russia](#) (March 2023).