

Closing Submissions by Iranian Canadian Congress

Public Inquiry into Foreign Interference in Federal Electoral Processes and Democratic Institutions

These submissions of the Iranian Canadian (“ICC”) draw from the ICC’s previous submissions and add more recent observations on newer proceedings and events.

- 1- The ICC will focus first on issues of particular concern to the Iranian Canadian community, as our organizational mandate requires of us. We will follow that with general observations that we feel are our right and duty to communicate as Canadian citizens, regarding issues affecting Canadian democracy in general, and which pertain to all communities across Canada, including Iranian-Canadians.

The most reliable information regarding the Islamic Republic of Iran and its engagement in foreign interference in Canada, was provided by CSIS in the summary report CAN.SUM.000014 (“Country Summary: Iran”) which indicates that “The Islamic Republic of Iran is not currently, nor has it been historically, a significant foreign interference (FI) threat actor in relation to Canadian federal elections including the 43rd and 44th General Elections”. The report indicates the belief that “officials from Iran are likely monitoring, influencing, and collecting information on the Iranian diaspora community as part of its efforts to prevent criticism of the regime”. It continues, "In some cases, Iran seeks to silence Canada-based critics through harassment and intimidation. For example, Canada-based families of several victims of the downing of flight PS752 have reported being pressured for their criticism of the regime's handling of the incident".

2- The ICC has continually condemned all forms of foreign interference by state and non-state actors in Canada and has emphasized the role of Canada's security and law enforcement agencies to counter any foreign-affiliated actor, including Iranian actors, that may intend to cause harm to Canadians or interfere in our democratic institutions. In addition, ICC believes that, aside from security and law enforcement measures, through strengthening our public education on civic engagement and by encouraging debate and discussion on public policy issues among Canadians, we can combat and counter the threat of foreign interference and immunize our society against disinformation and misinformation campaigns organized by foreign-linked actors intending to influence and shape Canadians' opinion on public policy issues.

The ICC does not believe that censorship is an effective method of countering foreign interference. In a democratic society, the authorities should foster free and open debate. Citizens should be trusted to discern truth from falsehood. Their ability to do so is the very foundation of participatory democracy.

The best way to counter disinformation is by means of evidence and logic. When government authorities and/or private actors (such as social media companies) are accorded the power to censor, they invariably use that power to silence legitimate dissent and to promote their own ideological perspective, to the detriment of other perspectives. Moreover, the use of censorship powers often generates suspicion that those who wield those powers have something to hide. In other words, censorship often backfires by fueling unfounded 'conspiracy theories'.

As stated by former U.S. Supreme Court Justice Louis Brandeis, ‘the best disinfectant is sunlight’.

The ICC, in its initial filing, reported to the Commission an “example of how unfounded allegations of foreign interference are being used as a way for political opponents to discredit each other.” The case was about an incident in February 2024, when one of the candidates seeking the Conservative nomination in the federal riding of Richmond Hill terminated his campaign and withdrew his nomination, alleging “significant foreign interference” in his campaign as the cause for his withdrawal. In a couple of media interviews, the candidate alleged that he is confident that Iran’s cyber army was involved.” [WIT0000081.EN] [WIT0000081.001] Since then, the testimony to this commission by Mr. Michael Crase, the Executive Director of the Conservative Party of Canada, on 20th September 2024, has shown that this individual has never applied as a candidate of the Conservative party, nor he has ever filed a complaint with the Conservative party to review his claims.

- 3- A significant aspect of malign foreign interference involves the suppression of certain voices while amplifying others in the public sphere. From this perspective, it is irrelevant whether this manipulation is conducted by allies or adversaries. Publicly available data indicates that much of this interference comes from Canada's allies. Such actions may be directly orchestrated by foreign governments or indirectly facilitated through foreign institutions [ICC0000028], corporations (subcontractors), individuals, or even through Canadian entities, including institutions, corporations, and individuals [ICC0000022].

4- Foreign actors and governments of other nations, democratically elected, authoritarian, or autocratic, friend or foe, are not citizens of Canada and do not have the right to intervene in our democratic process, but of course feel entitled to pursue their own national interests. Foreign countries are not monolithic. Various actors and diverse ideologies may prevail in other countries at different times. It is quite possible that what Canadians decide to do may be inconsistent with the decisions made by other democracies. The prevailing parties in other democracies may wish a different outcome in Canadian elections than what most Canadians want. History has shown that Canadian people have been able to independently make choices that later were found more prudent than the decisions made by other democracies. For example, in Iraq, our allies would have been better off if they had followed the Canadian lead. **While we cannot block freedom of the press and media, we should ensure that when foreign-linked or foreign-backed media organizations engage with our public, the public is aware of their linkages and foreign backing.** [ICC0000016]

It should be clear that Canadian political actors must be prohibited from engaging in a "favor economy," whereby accepting favors from any source could allow foreign actors to funnel funds and influence Canada's political system. [ICC0000002]

5- Foreign powers, including parties that may come to power in allied states, might use Canadian think tanks, diaspora organizations, and other non-governmental institutions to sway political actors toward their ideological goals. Whether or not these institutions are aware of their actions being influenced by foreign funding is irrelevant because funding invariably affects their output, regardless of their confidence in their independence. [ICC0000026]

- 6- Canadian agencies who are protecting us from foreign adversaries, can also ask our foreign partners to refrain from allowing their public or private entities to conduct disinformation or misinformation operations targeting Canadian entities. It should be clear to any government, adversarial or partner, that there will be a price if they conduct such operations against Canadian citizens or institutions. [ICC0000029]

- 7- At the same time, it should be understood by Canadian authorities that diaspora communities naturally want Canada's government to have constructive relations with the country of their origin. There is nothing nefarious about this. Too often, Canadians from diaspora communities are characterized as disloyal to Canada simply because they want Canada to have friendly relations with their countries of origin. As a general matter, peaceful relations, de-escalation of tensions and constructive dialogue benefit the Canadian people as a whole. By contrast, mutual hostility between states and a breakdown in inter-state dialogue creates security risks for Canadians.

- 8- Diaspora organizations such as the ICC, which value Canada's soft power and strive to maintain Canada's image as a peacemaker and peacekeeper, often adopt anti-war and anti-occupation stances. They seek win-win solutions to conflicts. This could be at odds with the views of those who perceive situations as zero-sum games and view the use of force as the solution to every problem. [ICC0000014]

- 9- While deterring, combating and countering malign foreign interference is a crucial action, Canada needs to ensure that the actions the government, policymakers and security

agencies take do not:

- Harm the multicultural fabric of our society
- Single out and discriminate against Canadian immigrants and ethnic communities
- Discourage open and democratic debate and discussion within Canada.

It is vital that discussions on foreign interference are not manipulated by special interest groups aiming to securitize public policy to promote a hawkish or neoconservative foreign policy agenda. Unfortunately, during some proceedings of the FI Commission, individuals with overt political agendas attempted to falsely accuse progressive Canadians—who advocate for a foreign policy based on peaceful coexistence and diplomacy rather than military intervention—of having ties to foreign governments or advancing foreign interests. Alignment of public opinion with the official positions of a foreign state is not an adequate reason to conclude that foreign state interference has occurred.

10- We are concerned about the possibility that peremptory and false accusations of foreign interference can perpetuate long-standing divisions within various diaspora and ethnic communities, including the Iranian Canadian community. Historically, factions within Iranian Canadian community have tried to discredit individuals based on their political beliefs, often with unfounded accusations of association with foreign governments. These false accusations have placed tremendous pressure on progressive members of our community, leading to discrimination and harm. As a result, many have chosen to remain silent or withdraw from civic engagement, fearing for their safety, job security, and professional careers. Our concerns stem from the potential for such claims to perpetuate

long-standing internal divisions and conflicts within various diaspora and ethnic communities, including the Iranian Canadian community.

11- We want to draw the attention of the commission to the fact that the **primary source of discord in the Iranian Canadian community stems from differing views on Canada's foreign policy toward Iran.** Iranian Canadian activists, who oppose military action or sanctions, citing their detrimental impact on the Iranian populace and regional peace and stability, are frequently attacked by hardline political factions. These factions prioritize regime change in Tehran over all else, disregarding both Canada's interests and the potential harm that increased instability may inflict on the people of Iran and the broader region. We are concerned about the potential misuse of the commission's public hearings by some parties, using framing and exclusion, to limit the diversity of expressed opinion by Iranian Canadians.

12- We echo the sentiments of the speakers from the Panel on Civil Liberties, Racism, and Foreign Interference Narratives. The three panelists from the Chinese community mentioned deeply regrettable events in Canada's history as the "yellow peril" and the Chinese Exclusion Act, with some expressing the sentiment that the current orientation of Canadian institutions and police oversight of their communities resembled a "witch hunt". More than one panelist also expressed that they or their communities were targeted and accused of being foreign agents simply because their views were different and specifically because they did not take a harsh political stance against the PRC.

Ms. Wawa Li's testimony about "politically motivated groups instrumentalizing the context" of this Commission to further their agendas resonated with us. Dr. Paul Robinson's experiences of self-censorship due to fear for his family's safety, and his view that restrictions on university partnerships harm Canadian defense by fostering an "impoverished understanding" of adversaries, were particularly impactful. He expressed succinctly the potential risks affecting inquiries into foreign interference, stating that they are often plagued with statements that are "sloppy", "factually incorrect", and have a "chilling effect" which "narrow[s] the Overton window", and can backfire because the silencing effect generated "intimidates those who have alternative views" who then "become increasingly alienated from those institutions". We therefore echo his calls to "avoid threat inflation" and alarmism, which "can lead to the targeting of innocent people", as well as his calls to "ensure recommendations are effective" and "avoid anything that smacks of censorship".

- 13- We were quite shocked at some of the aggressive policy suggestions ranging from banning social media platforms--a policy more suited to authoritarian states than to democratic ones --to suggestions that Canadian security agencies should conduct investigation of Canadian organizations and citizens who advocate for peace. This may increase the scope of policing and result in potential harm to civil liberties such as free speech. Lest we forget McCarthyism and repeat the brutal political suppression of that era, we should pay careful attention to the motivations and funding of actors who promote such oppressive policies and consider the harms to democracy and the trust of Canadian citizens.

We applaud Commissioner Hogue's recent decision to deny the request to purge from the record certain statements which provided an alternative perspective warning against the potential harms of harsh sanctions on other nations. The very request smacks of the type of censorship that the ICC opposes.

14- There are political actors among our partners and our non-partners who believe that political power grows out of the barrel of a gun, and there are those who instead value diplomacy and soft power. While war is sometimes inevitable, often, a win-win solution is possible. Presumption of the absolute truth of one solution or another to a given problem requires the assumption of infallibility. The worldview of war hawks in our allied nations and in other countries dictates an impossibility of the existence of win-win solutions; therefore, they attempt to discredit and silence the organizations that do not echo their desire for a confrontational approach. This world view is defined in academic and political circles as 'neoconservatism'. But Ideology is not the only factor. It is unfortunate that the privatization of military industrial complexes all over the world has created incentives for adoption of such a world view everywhere. At this dangerous moment in world history, many foreign actors have various incentives to interfere in Canada's political discourse.

15- The possibility exists for Canadian institutions and individuals to be exploited as fronts for foreign entities funneling favors, benefits, and funds into Canada's democratic system. Entities with interests that do not align with Canada's national interests should be monitored for such interference, and authorities should not give Canada's supposed allies a free pass for funneling money into the Canadian political system, as there is no

guarantee that parties in allied nations will not attempt to steer Canadian politics toward their own ideological ends.

MPs should be prohibited from accepting favors from organizations or individuals whose sources of income are opaque or ambiguous. Increasing MPs' allowances to cover foreign travel and reasonable accommodations, so they do not need to rely on external favors, would be taxpayer money well spent. This would decrease the likelihood of Canadian politicians being influenced by foreign entities. Once such allowances are in place, MPs should be banned from accepting foreign-linked favors, ensuring that any benefits they do accept can be appropriately scrutinized.

16- In closing, we place our trust in the Commission's commitment to thorough, objective, and unbiased examination of all testimonies and evidence. It is our hope that the Commission will handle these sensitive matters with the high level of diligence and impartiality they demand, ensuring that the inquiry remains a credible and respected instrument of justice and truth-seeking. Finally, we hope that Canada will not give up essential Liberties to overcome the concerns about her security and safety.