

February 22, 2021

The Right Honourable Justin Trudeau
Prime Minister of Canada
80 Wellington Street
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The Honourable Erin O'Toole
Leader of the Opposition
House of Commons
Ottawa, ON K1A 0A6

Jagmeet Singh
Leader of the New Democratic Party
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Yves-François Blanchet
Leader of the Bloc Québécois
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Annamie Paul
Leader of the Green Party
Green Party of Canada
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Via email

Re: Use of anti-terrorism laws to combat racism and white supremacism

Prime Minister Trudeau, Mr. O'Toole, Mr. Singh, M. Blanchet and Ms. Paul,

As organizations and individuals with expertise in anti-racism, law, and/or human rights, we write to express our deep concern about the use of anti-terrorism powers to address the threat of White supremacism.

The growth, proliferation, and emboldening of White supremacist and far-right groups across Canada – numbering more than 300, according to one recent academic count¹ – is alarming, and urgently requires a strong response. We applaud and support the intention to condemn White supremacism communicated by the recent addition of the Proud Boys, Atomwaffen, the Base,

and the Russian Imperial Movement to the terrorist entities list. However, the entrenchment and expansion of problematic anti-terrorism tools threatens to further intensify racism, rather than alleviate it.

Serious issues with Canada's terrorist listing procedure identified by civil liberties groups, lawyers, and legal academics include: the imposition of serious financial and possibly criminal consequences on the basis of unaccountable executive listing decisions; the use of secret evidence; the likelihood of false positives; and the absence of adequate avenues for challenging listings and obtaining redress. This is exacerbated by the seizure of assets, making legal counsel difficult if not impossible to retain.ⁱⁱ

These shortcomings and the need for a substantive overhaul of the listing procedure were highlighted by many experts and advocates when Bill C-36, the *Anti-Terrorism Act*, was debated and adopted twenty years ago, and have been consistently pressed over the years since.

As University of Toronto Law Professor and noted national security expert Kent Roach has observed: "Unfortunately, a few token additions [of far-right organizations] to long lists of proscribed groups does nothing to address the many due process and operational flaws of proscription."ⁱⁱⁱ

Indeed, nine more groups identified as "Islamist" were added as terrorist entities at the same time as the Proud Boys and others. This perpetuates the discriminatorily Muslim-centric focus of Canadian anti-terrorism in general,^{iv} and the listing procedure in particular,^v despite the far greater toll inflicted by White supremacist and right-wing actors within Canada.^{vi} The listing of organizations like the Proud Boys alongside Palestinian and Kashmiri groups – as well as charities like IRFAN, proscribed for donating medical equipment to the Gaza Strip^{vii} – conflates groups originating under or responding to long-term military occupation,^{viii} with White supremacists and neo-Nazis, all under the rubric of a broad and inconsistent concept of "terrorism."^{ix}

Moreover, given repeated revelations about the use of anti-terrorism surveillance tools against Indigenous land and water protectors and rights advocates,^x we are profoundly concerned about the possibility of future listings being deployed to target Indigenous nations defending their sovereign, constitutional, and international rights.

The systemic racism pervasive in Canadian national security institutions has been documented by, *inter alia*: the 2006 O'Connor Inquiry (regarding the torture of Maher Arar);^{xi} the 2008 Iacobucci Inquiry (regarding the torture of Abdullah Almalki, Ahmad Abou-Elmaati, and Muayyed Nureddin);^{xii} the 2016 BC Supreme Court decision in *R v Nuttall* (detailing the entrapment of two Muslim individuals struggling with mental illness);^{xiii} the 2020 report of the National Security Transparency Advisory Group;^{xiv} the consistent findings of United Nations human rights bodies (including their condemnation of Canada's complicity in torture and the use of security certificates);^{xv} and multiple lawsuits against CSIS alleging severe racial discrimination and harassment against Muslim and racialized employees.^{xvi} In 2011, the Canadian Human Rights Commission called on national security agencies to collect and analyze

race-disaggregated data about their practices^{xvii} – a basic transparency measure that remains unimplemented.

And so, instead of expanding anti-terrorism in the name of anti-racism, we urge you to address the pressing concerns raised repeatedly by civil liberties and anti-racism organizations^{xviii} about the anti-terrorism apparatus itself.

Sincerely,



Azeezah Kanji
Legal academic and journalist



Tim McSorley
National Coordinator
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90. World BEYOND War
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96. John Liss, lawyer
97. Natalie Kouri-Towe, Assistant Professor, Concordia University
98. Mark Ayyash, Associate Professor of Sociology, Mount Royal University

99. Samidoun Palestinian Prisoner Solidarity Network
100. Dalya Al Masri, Journalist & Human Rights advocate
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103. Rev. Shawn Newton, Unitarian clergy
104. Calgary Anti-Racist Action
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106. Diana Ralph, Ph.D.
107. Rev. Dr. Loraine MacKenzie Shepherd, United Church minister
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109. Ronald Stockton, Labour & Human Rights Lawyer
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148. Elizabeth Mudeny, community organizer and writer
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162. Sarah Beamish, lawyer
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164. Katie Cameron, writer, activist, library worker
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166. Jail Accountability and Information Line
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173. Lia Tarachansky, Israeli filmmaker
174. Janet Conway, Nancy's Chair in Women's Studies, Mount Saint Vincent University

ⁱ Alex Boutilier, "Researchers to probe Canada's evolving far-right movements," 6 March 2019, *Toronto*

ⁱⁱ Craig Forcese and Kent Roach, "Yesterday's law: Terrorist group listing in Canada" (2018) *Terrorism and Political Violence*,

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ⁱⁱⁱ Kent Roach, “Counterterrorism and the challenges of terrorism from the far right” (2020) *Common Law World Review*, <https://journals.sagepub.com/doi/10.1177/1473779520975121>

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https://www.broadbentinstitute.ca/atlast_tweet/securitization_and_the_muslim_community_in_canada; Tabasum Akseer, “Understanding the Impact of Surveillance and Security Measures on Muslim Men in Canada” (2018), *Centre for International and Defence Policy*, Queen’s University,

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^v 56 out of 73 currently listed entities are identified as Islamist or Muslim-linked. Public Safety Canada, “Currently listed entities,” <https://www.publicsafety.gc.ca/cnt/ntnl-scrnt/cntr-trrrsm/lstd-ntts/crrnt-lstd-ntts-en.aspx#58>.

^{vi} Since 2001, White supremacist and right-wing actors have been responsible for at least 22 fatalities, and individuals identified as Islamist for 2; see Canadian Network for Research on Terrorism, Security and Society, “Canadian Incident Database,” <http://extremism.ca/results.aspx?Pivot=PrIP>; Jacob Serebrin, “Ceremonies marking fourth anniversary of Quebec City mosque shooting begin with call for gun control,” 29 January 2021m *Global News*, <https://globalnews.ca/news/7607421/quebec-mosque-shooting-anniversary-2021/>; Leyland Cecco, “Toronto van attack suspect says he was ‘radicalized’ online by ‘incels,’” 27 September 2019, *The Guardian*, <https://www.theguardian.com/world/2019/sep/27/alek-minassian-toronto-van-attack-interview-incels>.

^{vii} Daniel Leblanc and Colin Freeze, “Charity that worked with Palestinians added to Canada’s terror list,” 29 April 2014, *The Globe and Mail*, <https://www.theglobeandmail.com/news/politics/charity-that-worked-in-palestine-added-to-canadas-terrorist-list/article18320497/>; Darryl Greer, “Canadian charity fights to remove ‘terrorist’ label,” 9 March 2017, <https://www.courthousenews.com/canadian-charity-fights-remove-terrorist-label/>.

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^x See, for example: Proulx, Craig. “Colonizing Surveillance: Canada Constructs an Indigenous Terror Threat.” *Anthropologica*, vol. 56, no. 1, 2014, pp. 83–100. *JSTOR*, www.jstor.org/stable/24469643; Abigail Curlew, “The New Threat Threshold,” 1 March 2017, *Briarpatch Magazine*, <https://briarpatchmagazine.com/articles/view/the-new-threat-threshold>; Ainslie Cruickshank, “Documents

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^{xi} Dennis O’Connor, Commissioner, “Report of the events relating to Maher Arar” (2006), <http://publications.gc.ca/site/eng/295791/publication.html>.

^{xii} Frank Iacobucci, Commissioner, “Internal inquiry into the actions of Canadian officials in relation to Abdullah Almalki, Ahmad Abou-Elmaati and Muayyed Nureddin” (2008), <http://publications.gc.ca/site/eng/331864/publication.html>.

^{xiii} *R v Nutall*, 2016 BCSC 1404, <https://www.canlii.org/en/bc/bcsc/doc/2016/2016bcsc1404/2016bcsc1404.html?autocompleteStr=R%20%20Nuttall%2C%202016%20BCSC%201404&autocompletePos=1>.

^{xiv} National Security Transparency Advisory Group, “Initial report: what we heard in our first year” (2020), <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/2020-nstag-irwwh/index-en.aspx>.

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^{xvii} Canadian Human Rights Commission, “Human Rights Accountability in National Security Practices: A Special Report to Parliament,” (November 2011), <http://www.chrc-ccdp.gc.ca/sites/default/files/chrc-specialreport-28112011.pdf>.

^{xviii} See, Canadian Bar Association, “Submission on the Three Year Review of the Anti-terrorism Act,” May 2005, <https://www.cba.org/CMSPages/GetFile.aspx?guid=a3a97aa7-14c2-4cd5-ac20-66b50b59c6cc>; Canadian Civil Liberties Association, “Submission to the Standing Committee on Public Safety and National Security regarding *Bill C-51, Anti-Terror Act, 2015*,” March 2015, <https://ccla.org/cclanewsites/wp-content/uploads/2015/05/2015-03-17-C51-Submissions-Final-w-names.pdf>; International Civil Liberties Monitoring Group, “In The Shadow Of The Law,” 14 May 2003, <https://iclmg.ca/wp-content/uploads/2014/03/R-In-the-Shadow-of-the-Law.pdf>; International Civil Liberties Monitoring Group, “Brief on Bill C-59, the *National Security Act, 2017*,” <https://iclmg.ca/wp-content/uploads/2019/05/C-59-brief-May-2019-update.pdf>; B.C. Civil Liberties Association, “Submission to the Consultation on Canada’s National Security Framework,” 13 December 2016, https://bccla.org/our_work/bcclas-written-submission-consultation-canadas-national-security-framework/.