

## SUPPLEMENTARY SUBMISSIONS TO THE SENATE STANDING COMMITTEE ON HUMAN RIGHTS

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### INTRODUCTION

Thank you for the opportunity to supplement my earlier written submissions and testimony to this Committee. My supplementary submissions are intended to address four issues relevant to the Committee's study on antisemitism in Canada:

1. Misstatements or inaccurate statements made to the Committee on November 3, 2025 by witnesses representing or aligned with Independent Jewish Voices (IJV)
2. The ever-increasing efforts to incorporate Anti-Palestinian Racism (APR) into anti-racism strategies, defined by its proponents to effectively label as racist those who support Israel's right to exist, rather than truly addressing discrimination against Palestinians
3. The role of anti-Zionism in contemporary antisemitism
4. The deeply disturbing levels of extremism and terrorist activities in Canada

These supplementary submissions should be read together with the supplementary submissions of the Network of Engaged Canadian Academics (NECA), particularly respecting the interplay between anti-Zionism, antisemitism and APR.

### **ISSUE ONE: Misstatements or inaccurate statements made to the Committee on November 3, 2025 by witnesses representing or aligned with Independent Jewish Voices (IJV)**

#### **Overview**

*Misstatements or inaccurate statements were made to the Committee on November 3, 2025 by witnesses representing or aligned with Independent Jewish Voices (IJV). They challenged the use and legitimacy of the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism based on flawed and misleading premises and attempted to minimize the unprecedented levels of existing antisemitism in Canada. Although they represent a fringe element within the Canadian Jewish community, the attention frequently given to them compels an evidence-based response.*

***The Committee was repeatedly told that the IHRA definition has been “authoritatively rejected,” and its illustrations of antisemitism excluded by IHRA to reach consensus.***

**FALSE.** The IHRA definition has been adopted or endorsed by 43 countries, including Canada, as well as by the European Union, the Organization of American States, and several UN-affiliated bodies. It represents the broadest international consensus on defining antisemitism and has become a practical tool for education, training, and policy development.

Since its adoption in 2019, Canada has used IHRA across federal and provincial agencies, municipal governments, and academic institutions.

- The definition informs federal training modules and public education efforts through the *Canada Anti-Racism Strategy (2024–2028)*.

- Provincial and municipal governments (including Ontario, British Columbia, and New Brunswick) have formally recognized IHRA.
- Over thirty Canadian universities reference IHRA in their human rights or EDI frameworks ([NECA and IHRA Final, 2024](#)).<sup>1</sup>

***The Committee was told that IHRA's examples were never formally adopted by the Alliance in 2016.***

**FALSE.** IHRA's plenary endorsed both the definition and its examples together, describing the latter as illustrations that may serve as guidance. Every country that has since adopted IHRA—including Canada—did so with both components. The suggestion that governments “added” the examples later is false.

***The Committee was told that IHRA suppresses criticism of Israel and that it perpetrates anti-Palestinian racism by mischaracterizing Palestinian human rights as inherently antisemitic.***

**FALSE.** It is quite remarkable that the witnesses made this accusation without even disclosing that IHRA specifically states that “criticism of Israel similar to that levelled against any other country cannot be regarded as antisemitic.” Or that IHRA states that contemporary antisemitism **could** (not **must**) include those examples/illustrations that follow, **taking into account the overall context**. This language is designed to prevent automatic or overbroad application.

The assertion that IHRA mischaracterizes the assertion of Palestinian human rights as antisemitic is also false. Criticism of Israel for alleged violations of Palestinian human rights is not only covered by IHRA's exemption pertaining to criticism, but the [Canadian Handbook](#) explicitly observes that Zionism is not incompatible with Palestinian self-determination. Some of the most robust criticisms of Israel, its conduct, policies and government in relation to Palestinian human rights come from Zionists (Jewish and non-Jewish) and Israelis.

IJV and Joshua Sealy-Harrington would have the Committee entirely separate antisemitism from anti-Zionism. Sadly, contemporary antisemitism is often manifested by anti-Zionism. To be precise, when I refer to anti-Zionists, I refer not to those who criticize Israel's conduct, government or policies, but instead, to those who call for the elimination of the State of Israel, deny the right of Jews to self-determination, and who distort the meaning of Zionism to demonize all Zionists without distinction.

It was troubling that one IJV witness previously stated that organizations supporting Israel should be “destroyed,” (at best, staggeringly inflammatory language) and refused to condemn Samidoun or Hamas, both prohibited in Canada as terror groups.

It is hardly surprising that antisemitic hate crimes have grown exponentially in Canada when all too often, all Zionists are labelled as “evil, genocidal and racist,” Canadian Jews are held collectively

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<sup>1</sup> NECA responds to the “No IHRA” campaign by the Academic Alliance Against Antisemitism, Racism, Colonialism, and Censorship in Canada (ARC), which partnered with Independent Jewish Voices (IJV) to repudiate the International Holocaust Remembrance Alliance Working Definition of Antisemitism. [Document link](#).

responsible for the actions, perceived or real, of a foreign state, and the October 7 atrocities are celebrated, glorified, excused or denied.

It is instructive that at least some of the witnesses appeared to support (despite some inconsistency in doing so) the Jerusalem Declaration on Antisemitism. The Jerusalem Declaration has not received global or institutional support comparable to IHRA. It contains significant flaws. However, it too has been criticized by anti-Zionists because it explicitly recognizes examples of activities that are, on their face, antisemitic although relating to Israel and Palestine:

- Applying the symbols, images and negative stereotypes of classical antisemitism to the State of Israel
- Holding Jews collectively responsible for Israel's conduct
- Requiring people, because they are Jewish, publicly to condemn Israel or Zionism
- Denying the right of Jews in the State of Israel to exist and flourish, collectively and individually, as Jews, in accordance with the principle of equality.

Anti-Zionists reject even the Jerusalem Declaration because it gives legitimacy to Israel's existence, an intolerable acknowledgement to those who advocate for its elimination.

The minimization by witnesses at this Committee's November 3 hearing of the nature and extent of antisemitic hate crimes in Canada was also troubling. It was inconsistent with law enforcement data from multiple sources and research on hate crimes and other antisemitic activities. It also appeared to contain an element of victim blaming (*ie* Jews bringing it on themselves by supporting Israel). It is cold comfort to an Ontario synagogue which was recently vandalized for the tenth time, to be told by a witness that his congregation and some others do not need a security guard or that the Jewish community is being overpoliced. The number of unequivocally antisemitic hate crimes in Canada is staggeringly high, and well documented.

***The Committee was told that the IHRA definition undermines academic freedom.***

**UNTRUE.** IHRA is not a law and carries no enforcement mechanism. The IHRA Working Definition, adopted by Canada in 2019 and reaffirmed in Canada's Anti-Racism Strategy (2024–2028), is a non-legally binding working definition used by governments, educators, and law-enforcement agencies to improve understanding of antisemitism in its modern forms.

The claim that IHRA "curtails academic freedom" ignores its actual purpose: to educate and inform, not to legislate or censor. Equally important, the Canadian Handbook provides important interpretative guidance. It is respectful of freedom of expression and academic freedom, and is carefully tailored. Independent reviews, such as the *UK Department for Education Report (2022)*, confirm that IHRA "*provides clarity and consistency without constraining academic freedom or political expression.*" And the United Kingdom's *Parliamentary Task Force on Antisemitism in Higher Education (2023)* found "no substantiated cases of IHRA's adoption leading to suppression of legitimate academic discourse."

IHRA helps practitioners recognize antisemitic patterns in real-world contexts—such as conspiracy theories, Holocaust denial, and certain double standards applied uniquely to Jews—without imposing penalties or limiting free speech.

The Canadian Association of University Teachers (CAUT) has voiced opposition to IHRA, and several of the November 3 witnesses cited its position with approval. However, [CAUT's own conduct](#) calls its credibility on this issue into serious question. Its 2025 *Report on Academic Freedom in Canada after October 7, 2023* purports to defend free expression but presents a one-sided view of academic freedom—minimizing the October 7 atrocities and downplaying hate incidents directed at Jews or pro-Israel academics.

CAUT's report also redefines academic freedom so broadly that it treats acts of vandalism and harassment as protected “extramural” expression while ignoring or downplaying the growing suppression of Jewish and Zionist voices on campus. In doing so, it undermines the very principles of institutional neutrality and research integrity it claims to uphold.

Most strikingly, CAUT has endorsed the Arab Canadian Lawyers Association's definition of “anti-Palestinian racism,” which labels anyone as racist who fails to affirm specific Palestinian narratives—discussed below. This definition, unlike IHRA, contains no contextual safeguards and effectively classifies the vast majority of Canadian Jews as “racist” for supporting Israel's existence.

The contradiction is glaring: CAUT rejects IHRA because it allegedly restricts speech but embraces a definition that suppresses Jewish self-expression and silences dissenting viewpoints. It is a case study in selective academic freedom—one that perfectly illustrates the misstatements voiced in the November 3 Senate hearing.

## **ISSUE TWO: Anti-Palestinian Racism (APR) AND**

## **ISSUE THREE: The Role of Anti-Zionism in Contemporary Antisemitism**

### **Overview**

*The ever-increasing efforts to incorporate Anti-Palestinian Racism (APR) into anti-racism strategies represent a [serious threat to the vast majority of Jews and Israelis](#). APR's proponents widely use a definition that does not legitimately address discrimination against Palestinians. Instead, it effectively labels as “anti-Palestinian racist,” anyone who supports Israel's right to exist as a Jewish state. Under that definition, a person is deemed to be an anti-Palestinian racist if they fail to affirmatively acknowledge that all Israeli territory, even within pre-1967 borders, is “occupied land.” Likewise, disagreement with Palestinian narratives surrounding the Nakba—the events surrounding Israel's creation—is treated as racism. This definition transforms a political disagreement into a moral indictment, branding individuals as racists for expressing alternative historical or legal interpretations. In other words, APR perpetrates discrimination against all Zionists (representing the vast majority of Jews) and Israelis, by promoting a political agenda.*

*Anti-Zionists rebrand and distort the true meaning of Zionism in order to demonize it and all Zionists without distinction. This obfuscation has enabled antisemitism to flourish and undermine the effectiveness of measures to combat it.*

### **Analysis**

To understand why Anti-Palestinian Racism (APR) is so dangerous, it is necessary to examine its connection to anti-Zionism and contemporary antisemitism. Modern antisemitism frequently

manifests through the language of anti-Zionism—by marginalizing and demonizing all Zionists simply for being Zionists.

Zionists, properly understood, are those who support Jewish self-determination through the existence of a Jewish democratic state in their ancestral lands. Over 90 percent of Canadian Jews—an overwhelming majority—support Israel’s right to exist as a Jewish democratic state. This support is not inconsistent with Palestinian self-determination, as noted in the Canadian Handbook. However, the anti-Zionist movement rejects Israel’s legitimacy entirely and seeks to delegitimize all Zionists.

### **Misrepresentation of Zionism**

Anti-Zionism often involves re-branding Zionism as a claim of Jewish superiority or as a colonial enterprise. This distortion ignores Jewish indigeneity, what Zionism means to the vast majority of its adherents and the diversity and origins of Israel’s population. By falsely equating Zionism with oppression, anti-Zionists appeal to progressive audiences under the guise of human-rights advocacy. In practice, this results in the exclusion of Jewish and pro-Israel voices—for example, by instructing students not to engage with (that is, to shun or marginalize) Zionists so as not to “normalize” Zionism.

### **Emergence of Anti-Palestinian Racism**

Against this backdrop, Anti-Palestinian Racism has emerged as a new ideological tool used to demonize Israel, Israelis, and the vast majority of Jews who support Israel’s right to exist. Originating in Canada and now spreading internationally, APR is being promoted to governments, universities, and other institutions as part of broader anti-racism frameworks—often without transparency or public consultation.

Superficially, the concept seems uncontroversial: few would object to combatting discrimination against Palestinians. Nor should they. We should all combat discrimination against any targeted communities. However, in practice, the only widely circulated definition of APR—developed by the Arab Canadian Lawyers Association (ACLA)—extends far beyond protecting individuals from discrimination. As already indicated, it effectively labels as “anti-Palestinian racist” anyone who supports Israel’s right to exist as a Jewish state.

### **Flaws in the Arab Canadian Lawyers Association Definition**

Under the Arab Canadian Lawyers Association definition, a person is deemed an anti-Palestinian racist if they fail to affirmatively acknowledge that all Israeli territory, even within pre-1967 borders, is “occupied land.” Likewise, disagreement with Palestinian narratives surrounding the Nakba—the events surrounding Israel’s creation—is treated as racism. This definition transforms a political disagreement into a moral indictment, branding individuals as racists for expressing alternative historical or legal interpretations.

### **Heritage Canada Grants to Support APR**

The danger posed by the Arab Canadian Lawyers Association’s definition of APR is amplified by the fact that the federal government, through Heritage Canada, has awarded a \$99,950 grant to that Association for a project entitled “Understanding Anti-Palestinian Racism: Educational Resources

and Training for Inclusive Practices.” The project is scheduled to run from January 1, 2025, to March 31, 2026. Heritage Canada previously paid \$2,000 to the same Association for French translation of its APR report that promotes its toxic definition of APR.

As explained, this definition is antithetical to any legitimate anti-racism strategy, it violates the federal government’s own policy and is incompatible with the federal government’s adoption of IHRA and the government’s Handbook.

Heritage Canada also agreed to provide \$99,500 to Toronto Palestinian Families for a project entitled, “Combatting Anti-Semitism and Anti-Palestinian Racism.” This project was to extend from January 1, 2025 to March 31, 2025. This is yet another example that raises real concerns about how antisemitism and APR are being defined and addressed in government funded initiatives.

Compounding these concerns is the continuing activism of Amira Elghawaby, Canada’s Special Representative on Combatting Islamophobia. Both her office and that of the Special Envoy on Preserving Holocaust Remembrance and Combatting Antisemitism operate within Heritage Canada and should be united in combatting hatred against all communities. However, there are disturbing indications that Ms. Elghawaby has used her office to advance a political agenda relating to the Middle East and to promote the inclusion of APR in anti-racism strategies—without disavowing the Canadian Arab Lawyers Association definition.<sup>2</sup>

Such government funding and public advocacy lend undeserved legitimacy to a definition that undermines equality principles, contradicts Canada’s formal adoption of IHRA, and risks institutionalizing a framework that vilifies the vast majority of Canadian Jews.

### **Practical Consequences of APR**

In practice, APR is being used to silence those who support Israel’s right to exist and to shield certain activists from legitimate criticism. In some cases, criticism of Hamas and its atrocities has even been portrayed as APR. This chilling effect undermines freedom of expression and academic freedom—core Canadian values.

Evidence of this danger is already visible. At Carleton University, a report titled *The Palestine Exception* accused professors who offer travel courses to Israel of engaging in APR. Such uses of APR are not about protecting Palestinians from hate but about suppressing pro-Zionist perspectives in academic and public discourse.

### **Legal and Policy Implications**

The Chief Commissioner of the Ontario Human Rights Commission has publicly affirmed that existing human-rights protections already cover any discrimination against Palestinians. In 2024, the OHRC stated that existing grounds in the Ontario Human Rights Code provide the necessary

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<sup>2</sup> In November 2024, I wrote to Ms. Elghawaby, asking that she clarify her position on campus speech targeting Zionists, publicly denounce the demonization of all Zionists as racist, and affirm that respectful dialogue must include those who support Israel’s right to exist. She did not respond to [my letter](#).

protection to deal with any potential form of discrimination based on or concerning race, ancestry, place of origin, ethnic origin, citizenship, or creed, such as anti-Palestinian racism.

Canada's Charter of Rights and Freedoms and human-rights codes already prohibit discrimination based on ethnicity, race, ancestry, or religion. There is therefore no legal necessity for introducing a new category such as APR. Indeed, adoption of the ACLA definition risks creating an unconstitutional orthodoxy that penalizes certain viewpoints and undermines free expression.

### **The Double Standard**

Proponents of APR strongly oppose the inclusion of “anti-Israeli racism” in anti-racism frameworks, even though Israeli Canadians are facing growing marginalization and hate crimes. This selective concern reveals APR's true purpose: it is incompatible with recognizing Israel's legitimacy.<sup>3</sup>

Moreover, APR is often promoted as an alternative to, or in opposition to, the International Holocaust Remembrance Alliance (IHRA) definition of antisemitism. Yet IHRA explicitly distinguishes between legitimate criticism of Israel and antisemitic conduct, whereas APR imposes no such distinction when it comes to criticism of Palestinian narratives. This double standard undermines anti-racism efforts and further endangers Jewish communities.

### **Broader Societal Risks**

APR imposes a rigid ideological orthodoxy on one of the world's most complex political and historical conflicts. In doing so, it erodes the foundations of Canadian democracy: open dialogue, freedom of expression, and academic freedom. Branding all Zionists as racist undermines respectful dialogue initiatives that we support.

If adopted into institutional policy, APR would create an environment in which Canadians who affirm Israel's right to exist risk being publicly branded as racists. This not only distorts the meaning of anti-racism but fosters division and hostility in Canadian society.

### **Recommendation**

1. The Federal government must explicitly reject adoption of APR as part of its anti-racism strategy and initiatives and stop funding initiatives incompatible with its own policies.

## **ISSUE FOUR – High Levels of Extremism and Terrorist Activities in Canada**

### **Overview**

*Domestic terrorism and violent extremism pose an escalating threat to Canada's security and to the safety of vulnerable communities—particularly Jewish Canadians, who remain a frequent target across ideological and political divides. The evidence presented by federal agencies and recent prosecutions demonstrates that these threats are both serious and growing.*

### **Scope of the Threat**

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<sup>3</sup> To be clear, targeting Israeli Canadians is more appropriately a discrimination, rather than a racism, issue. In this respect, Israeli and Palestinian Canadians are similarly situated. The point here is that proponents of APR inappropriately differentiate between the communities.

Earlier this year, the RCMP briefed the Minister of Public Safety on the magnitude of the problem:

- 6 foiled terrorist plots in the past 12 months alone;
- 25 suspects accused of 83 terrorism-related charges in a single year (April 1, 2023 – March 31, 2024), representing a 488 percent increase;
- 7 of those charged were young people, radicalized online through violent extremist content; and
- Overall, a 766 percent growth in charges relating to national security since 2018.

The RCMP also warned that existing law-enforcement resources are insufficient to combat violent extremism, foreign interference, and hate crimes—each described as a “hot issue.”

### **Nature of Foiled Terror Plots**

Recent plots share several defining characteristics:

- They are rooted in ideological, political, or religious violent extremism, many within Islamist extremism
- They target Jews, non-believers, and Western society generally
- Perpetrators have been radicalized by violent-extremist content (often but not exclusively online) or have produced or disseminated such content themselves
- Offenders may act as “lone wolves,” inspired by terrorist groups, or may operate on behalf of or at the direction of organized sponsors, including the Iranian government
- The Far Right has also been implicated in several terror conspiracies.

Regardless of ideology, extremists almost invariably include Jews among their targets. Antisemitism remains a unifying thread across radical movements, which also frequently target LGBTQ+ communities and other minorities.

### **Beyond the Numbers**

The number of terrorism-related charges does not capture the full extent of extremism. Many antisemitic hate crimes are not prosecuted as terrorism offences, and countless expressions of violent extremism online and in person never lead to criminal charges. These unmeasured incidents nevertheless victimize communities and contribute to radicalization.

### **Terror Financing and Foreign Influence**

The Ministry of Finance’s report on money laundering and terrorist financing describes how designated groups such as Hezbollah, Hamas, and the Khalistani violent-extremist group Babbar Khalsa International are actively raising funds in Canada.

FINTRAC’s 2022 Operational Alert identified Hezbollah as the second-most frequently funded terrorist organization through Canadian sources—Daesh/ISIS ranked first. Hezbollah finances itself through the international drug trade, including cocaine, heroin, fentanyl, and Captagon, using



Islamic money brokers (hawalas) to transfer funds overseas. The Port of Montreal was cited as a hub where luxury vehicles are shipped to Lebanon, generating revenue for Hezbollah through stolen-vehicle exports.

In 2024, Khalilullah Yousuf of Toronto pled guilty to two charges in what has been described as the largest terrorism-financing case in Canadian history. He raised money through GoFundMe for Daesh/ISIS and disseminated over 3,800 hyperlinks designed to radicalize, indoctrinate, and recruit on the group's behalf.

Canada has been identified by experts as a leading hub for terrorist money laundering and financing in the Western world. The Institute for the Study of Global Antisemitism and Policy (ISGAP) has further documented the influence of the Muslim Brotherhood and its primary state sponsor, Qatar, in Canada.

Meanwhile, groups such as Samidoun—designated as a terrorist organization under the Criminal Code—Hezbollah, the Iranian regime, Islamic Jihad, and radical student organizations, continue to operate largely with impunity. Although the Federal government recently announced measures to address the continuing corporate status of designated terrorist entities, the more significant issue is the continuing terror-supporting activities of such entities and their principals, without accountability.

### **The Need for Immediate Action**

It should not have to take another successful terrorist attack to awaken Canadians to the urgency of this threat. The following actions are critical to prevent further radicalization and violence.

### **Recommendations**

1. **Resources** – Ensure that robust human and financial resources are provided to the RCMP, CSIS, and partner agencies to prioritize the investigation, disruption, and prosecution of domestic terrorism, money laundering, and terror financing in Canada and abroad.
2. **National Strategy** – Develop a comprehensive national strategy to combat domestic terrorism, money laundering, and terrorist financing, integrating prevention, enforcement, and public education.
3. **Muslim Brotherhood Networks** – Examine evidence of Muslim Brotherhood influence and partnerships in Canada and its national-security implications, while safeguarding mainstream Muslim communities from radicalization. Governments should amplify Muslim voices—including members of our coalition—who courageously denounce extremism and antisemitism as inconsistent with their faith and values.
4. **Funding Controls** – Identify, track, and freeze governmental and non-governmental funding to entities with ties to ideological, political, or religious violent extremists, including all organizations prohibited as terrorist entities under the Criminal Code.
5. **Follow the Money** – Strengthen federal and provincial financial-disclosure requirements related to institutional funding sources to increase transparency and accountability.

6. **Parliamentary Priorities** – House of Commons and Senate committees must prioritize inquiries into terrorism, money laundering, and terror financing, and examine the role of foreign states such as Qatar and Iran in supporting extremist organizations. These reviews should take a holistic approach, addressing border security, immigration, online hate and terror propaganda, and abuse of charitable status.
7. **Hate Speech as Crime** – Recognize the direct connection between hate propaganda and domestic terrorism. Law enforcement must be trained to distinguish protected expression from hate speech and to enforce existing prohibitions effectively. Protests that incite hatred should not be treated as benign just because violence does not immediately take place.
8. **Wilful Promotion of Terror** – Amend the Criminal Code to create a new offence of *wilful* promotion of terror, criminalizing the communication of statements that wilfully promote terrorist activities or the activities of terrorist groups. The Supreme Court has already upheld a comparable restriction on speech in the offence of wilful promotion of hatred.
9. **Possession of Terrorist Symbols** – Introduce an offence prohibiting the wearing, carrying, or display of any symbol, name, word, or representation identifying or directly associated with a designated terrorist group. Canada should adopt the same zero-tolerance approach used successfully in other democracies.
10. **Deradicalization of Youth** – Respond to the RCMP and CSIS warning that online platforms are fueling youth radicalization. Governments must invest in deradicalization programs and youth-focused counter-extremism strategies. Violent extremist content is now more accessible, digestible, and impactful than ever before; intervention must match its speed and reach.

### **Recent Developments**

The Prime Minister recently announced a \$1.8 billion, four-year federal investment to expand policing capacity across Canada, including 1,000 new RCMP personnel and 150 dedicated to financial crimes. This is a welcome development—provided that counter-terrorism, extremism, and terror-financing enforcement receive priority.

Bill C-9 also offers an opportunity to address several of the legislative items outlined above. However, there are both positive and negative features of Bill C-9. I have outlined the benefits of the new legislation, as well as needed legislative amendments in my [written submissions](#) to the House Standing Committee on Justice and Human Rights. Those written submissions have been [adopted](#) by over 34 community organizations, Jewish, interfaith, Hindu, Iranian, Catholic. Contrary to the submissions made by IJV, Bill C-9, especially when coupled with my proposed amendments, does not infringe Charter protections or prevent lawful protest. It represents a useful tool in addressing antisemitism and other forms of hatred.

**All of which is respectfully submitted,**

*Mark Sandler*

Mark Sandler, Chair, Alliance of Canadians Combatting Antisemitism