



Office for Democratic Institutions and Human Rights

# CANADA

## EARLY FEDERAL ELECTION

28 April 2025

### ODIHR NEEDS ASSESSMENT MISSION REPORT

1 – 4 April 2025



Warsaw  
16 April 2025

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**CANADA**  
**EARLY FEDERAL ELECTION**  
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**ODIHR Needs Assessment Mission Report**

**I. INTRODUCTION**

Following the official invitation to observe the 28 April early federal election in Canada, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 1 to 4 April 2025. The NAM was composed of Keara Castaldo, ODIHR Senior Election Adviser, and Ranko Vukčević, ODIHR Election Adviser.

The purpose of the mission was to assess the pre-election environment and preparations for the early federal election. Based on this assessment, the NAM recommends whether to deploy an ODIHR election-related activity for the forthcoming election and, if so, what type of activity best meets the identified needs. The NAM held meetings with officials from state institutions as well as with representatives of political parties, media, and civil society. A list of interlocutors is annexed to this report.

ODIHR would like to thank Global Affairs Canada for its co-operation and assistance in organizing the NAM. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM and for sharing their views.

**II. EXECUTIVE SUMMARY**

On 23 March 2025, the Governor General of Canada dissolved the parliament on the advice of newly appointed Prime Minister Mark Carney, triggering an early federal election scheduled for 28 April. The election will be conducted during the shortest campaign period allowed by law under the Canada Elections Act, and will take place using new constituency boundaries adopted by independent commissions after the 2021 census. The government launched a public inquiry into foreign interference in electoral processes, which determined that potential interference in previous elections did not impact the ultimate results, but highlighted opportunities for increased transparency, enhanced institutional coordination, and improved safeguards to protect democratic institutions.

The electoral legal framework remains largely unchanged since the 2021 early federal election. While several legislative proposals were introduced, including bills concerning voting procedures, party financing, and candidate demographics, none have been adopted. Some previous ODIHR recommendations remain unaddressed in the legal framework, including the absence of explicit legal provisions for citizen and international observers and the lack of expedited timelines for election dispute resolution. The overall electoral legal framework was positively assessed by the majority of ODIHR NAM interlocutors, but many described a need for further refinement.

Elections are administered by a three-tiered structure led by Elections Canada, an independent body with broad authority to conduct and supervise electoral processes, and to conduct post-election evaluations and issue recommendations. All ODIHR NAM interlocutors expressed strong confidence in the integrity, professionalism and transparency of the election administration, though a few noted longstanding logistical challenges related to delivering services in remote communities. For this election, following a review of services to Indigenous electors, Elections Canada has increased the services available within and in proximity to Indigenous communities to further promote access.

Election security and integrity are supported by the Security and Intelligence Threats to Elections (SITE) Task Force, which coordinates threat monitoring and information-sharing across federal security and intelligence agencies.

The National Register of Electors is maintained by Elections Canada and regularly updated with information from various federal, provincial, and territorial bodies. While most eligible voters are automatically included, the registration is not universal, and some first-time voters or those with unregistered changes must proactively register or update their records. Extensive opportunities are available to update voter records, including on election day with proof of identity and residence. While ODIHR NAM interlocutors expressed confidence in the overall integrity of voter lists, some noted lower registration rates among youth and other first-time voters and in Indigenous communities.

Candidates may be nominated by political parties or run independently. ODIHR NAM interlocutors were satisfied with current candidate registration procedures, though some noted security vulnerabilities related to party nomination processes, particularly in the context of foreign interference, that have been identified in recent reviews. Political parties are not legally required to ensure gender parity among nominated candidates, and there is no legal obligation to publish gender-disaggregated candidate data.

The election campaign period began on 23 March, immediately following the issuance of the writs of election. ODIHR NAM interlocutors generally assessed the campaign environment as open and pluralistic. The Canadian Radio-Television and Telecommunications Commission maintains a Voter Contact Registry and regulates automated voice calls to citizens by political parties, which ODIHR and electoral authorities have previously recommended be expanded to include other mass communications by political parties. While online platforms are required to maintain registries of political advertisements, some ODIHR NAM interlocutors noted concerns over the spread of disinformation and enforcement challenges in the digital space.

Election campaigns can be financed through a combination of loans and donations from citizens and permanent residents, and through public reimbursement of certain campaign expenses. Political parties and candidates must file detailed financial reports within four to eight months of the election, but no interim disclosure is required before election day, despite a prior ODIHR recommendation. Non-compliance with campaign finance regulations may lead to administrative or criminal sanctions, including financial penalties or disqualification from future elections. The Chief Electoral Officer has recommended that political parties should be required to submit documentary evidence with their financial returns.

Canada has a diverse and pluralistic media landscape, with television and online platforms serving as key sources of political information. The legal framework guarantees the freedom of expression and equitable access to media. The CRTC issues guidance to broadcasters and political contestants during election periods, and the Broadcasting Arbitrator allocates free and paid airtime to political parties on licensed broadcasters. Two national debates among party leaders are scheduled in the English and French languages, with certain participation and format criteria determined by an independent commission.

Complaints related to the conduct of the election and campaign finance can be submitted to the Commissioner of Canada Elections, who investigates potential violations and may take administrative or legal action. The Commissioner informed the ODIHR NAM of an increased number of complaints and applications submitted by the public, which some interlocutors considered an indication of growing public awareness of electoral rights and avenues for redress. Voters and candidates may challenge election results in court, and decisions may be appealed to the Supreme Court under certain legal grounds. Although the overall framework for dispute resolution was positively assessed by the majority

of ODIHR NAM interlocutors, a previous ODIHR recommendation regarding the lack of expedited timelines for resolving election disputes remains unaddressed.

Contestants may appoint representatives to observe all stages of election day proceedings. The legal framework does not explicitly provide for citizen or international election observation, contrary to longstanding ODIHR recommendations. The authorities assured the ODIHR NAM that any potential ODIHR observation activity would be facilitated in line with OSCE commitments.

The majority of ODIHR NAM interlocutors, while supportive of a potential ODIHR observation activity and recognizing the value of an external review, were of the opinion that an observation activity was not necessary. The ODIHR NAM noted limited changes to the legal framework since the previous federal election, as well as increased efforts and co-ordination among national institutions to review the security of electoral processes. Interlocutors consistently expressed confidence in the integrity, professionalism and transparency of the election administration, emphasizing a stable electoral environment and the absence of significant challenges that would warrant a broader observation presence. A few concerns were raised about potential disinformation campaigns and the integrity of the information space during the election period, and several interlocutors noted that the electoral legal framework could be further reviewed and refined to address emerging challenges.

Based on findings in this report, ODIHR does not recommend the deployment of an election observation activity for the 28 April 2025 early federal election. ODIHR reiterates that a number of its previous recommendations remain valid and stands ready to support the authorities through other tools available, including in the form of a legislative review.

### **III. FINDINGS**

#### **A. BACKGROUND AND POLITICAL CONTEXT**

Canada is a constitutional monarchy with a federal and parliamentary system of government. The Crown is the head of state, and legislative powers are vested in the bicameral parliament. The Members of the lower chamber, the House of Commons, are elected by popular vote under a majoritarian system within single-member constituencies. Members of the upper chamber, the Senate, are appointed by the Governor General on the advice of the Prime Minister and serve until the age of 75. While executive authority is formally vested with the Crown, it is exercised by the Prime Minister and cabinet in the name of the Governor General. As a federal state, the Constitution distributes power between two orders of government: the federal government and provincial and territorial governments.

Five parties were elected to the House of Commons in the previous early federal election held in September 2021.<sup>1</sup> While no individual party obtained the seats required to form a majority government, the Liberal Party, having won the most seats, formed a minority government.<sup>2</sup> On 6 January 2025, Prime Minister Justin Trudeau announced his intention to resign his office, and an ensuing Liberal Party leadership contest resulted in the instatement of Mark Carney as Prime Minister on 14 March. On 23 March, Mr. Carney requested that the Governor General issue writs of election for the House of Commons, thereby dissolving parliament and setting the date for the early election on 28 April.

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<sup>1</sup> Liberal Party (160 seats of whom 62 were women), Conservative Party (119 seats, of whom 22 were women), Bloc Québécois (32 seats, of whom 12 were women), New Democratic Party (25 seats, of whom 11 were women), Green Party (2 seats, of whom 1 was women) and 1 independent.

<sup>2</sup> The minority government formed in 2021 became the longest-serving minority government in Canadian history.

Women remain under-represented in public office in Canada, holding 104 out of 338 seats (30.8 per cent) in the House of Commons before its dissolution. At the municipal level, women comprise approximately 31 per cent of elected representatives, including 21 per cent of mayoral positions. After a Cabinet reshuffle by then-Prime Minister Justin Trudeau in December 2024, 19 out of 38 federal ministers (50 per cent) were women. In March 2025, the newly appointed Prime Minister Mark Carney reduced the size of the Cabinet to 24 members, 11 of whom are women (46 per cent). However, the overall number of women in executive roles remains limited, and the recent elimination of the dedicated ministerial portfolio for Women and Gender Equality has raised concerns among civil society groups and political figures.<sup>3</sup> The current Governor General, Mary Simon, who was appointed in 2021, is a woman and the first Indigenous person to hold the office.

ODIHR has previously observed three federal elections in Canada.<sup>4</sup> Most recently, ODIHR deployed an Election Expert Team (EET) for the 2021 early federal election. Its final report, issued in February 2022, contains 11 recommendations, including 4 priority recommendations, for the authorities to improve the electoral process and bring it closer in line with OSCE commitments.<sup>5</sup>

## **B. ELECTORAL SYSTEM AND LEGAL FRAMEWORK**

Federal elections are regulated by the 1867 and 1982 Constitution Acts, the 1982 Canadian Charter of Rights and Freedoms, the 2000 Canada Elections Act (“the Elections Act”, last amended in June 2023), the 1985 Electoral Boundaries Readjustment Act, along with various regulations and instructions issued by Elections Canada.<sup>6</sup> Canada is a party to major international and regional instruments related to the conduct of democratic elections. Some previous ODIHR electoral recommendations remain unaddressed in the legal framework, including those in relation to guarantees for citizen and international election observation, additional measures for the oversight of political advertising and campaign finance, and expedited timelines for election dispute resolution. Several interlocutors assessed that the electoral legal framework would benefit from further revision, including in line with recommendations issued by the electoral authorities.

The Elections Act has not been substantively amended since the 2021 federal election.<sup>7</sup> Several bills proposing amendments to the Elections Act were introduced in Parliament in the ensuing period, but none were adopted.<sup>8</sup> Other recent legislative developments include the adoption of the Countering

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<sup>3</sup> See a [15 March 2025 joint statement of advocacy organizations](#). Mr. Carney has explained that all services have been retained and consolidated under a smaller number of ministries.

<sup>4</sup> See [prior ODIHR election-related reports on Canada](#).

<sup>5</sup> In paragraph 25 of the 1999 OSCE Istanbul Document, OSCE participating States committed themselves “to follow up promptly the ODIHR’s election assessment and recommendations”.

<sup>6</sup> This framework is complemented by other legislation, including the 1985 Canada Human Rights Act, the 1993 Telecommunications Act, and the 1985 Criminal Code.

<sup>7</sup> Minor amendments to the Elections Act were introduced by the bills C-11 on 27 April and C-47 on 22 June 2023. Bill C11, an Act to amend the Broadcasting Act, also introduced amendments to the Elections Act by aligning provisions related to political broadcasting and advertising with the updated Broadcasting Act, including updates to terminology to reflect the application of these provisions to online streaming platforms. Bill C-47 provides for a national, uniform, exclusive and complete regime applicable to registered parties and eligible parties respecting their collection, use, disclosure, retention and disposal of personal information.

<sup>8</sup> Notably, Bill C-65, a government bill referred to committee in June 2024, proposed several amendments related to the delivery of elections, voting processes, party registration, and political financing. Three Senate public bills introduced in 2024 also sought to amend the Elections Act: Bill S-283 proposed demographic reporting requirements for political parties and the Chief Electoral Officer; Bill S-201 proposed lowering the federal voting age from 18 to 16; and Bill S-17 aimed to correct outdated terminology in electoral legislation. In addition, in 2022, three individual members’ bills included proposals to supply the electors with ballots in an Indigenous language in certain circumstances (Bill C-297), require by-elections upon party-switching by MPs (Bill C-254), and lower the voting age from 18 to 16 (Bill C-227).

Foreign Interference Act (Bill C-70) in June 2024, which introduced a series of legal measures aimed at protecting democratic institutions from covert foreign influence. The Act amends the Criminal Code to establish new offences related to deceptive or clandestine acts undertaken on behalf of foreign entities, including with the intent to influence political or electoral processes, such as nomination contests and election campaigns. It also establishes a Foreign Influence Transparency Registry, requiring individuals and entities acting on behalf of foreign principals for political purposes to register their activities. These measures are complemented by enhanced investigative powers for the Canadian Security Intelligence Service, including in relation to threats targeting electoral integrity.

Members of the House of Commons are elected through a first-past-the-post system in single-member electoral districts, commonly known as ridings. The number of seats in the House of Commons will increase from 338 to 343 in the upcoming early federal election, following a mandatory redistribution process conducted by independent electoral boundary commissions established in each province. This process takes place every ten years based on census data to reflect shifts in population across provinces.<sup>9</sup> While the law requires that constituencies be as close as reasonably possible to the electoral quota, it permits deviations of up to 25 per cent from the average population size. In exceptional cases, greater deviations may be allowed to respect communities of interest or identity, historical patterns, or geographic considerations in sparsely populated areas. Following the redistribution, the average population per electoral district is approximately 107,850. Most ridings fall within 25 per cent of this average, though a limited number of exceptions exist in accordance with the law. ODIHR has previously commented on significant disparities in the size of electoral constituencies, and recommended revising the legal framework to better uphold the principle of equality of the vote in accordance with international good practice.<sup>10</sup>

### C. ELECTION ADMINISTRATION

The election is administered by a three-tier election administration led by Elections Canada, which is responsible for the overall conduct and supervision of federal elections. The Chief Electoral Officer (CEO) is appointed by the House of Commons for a ten-year non-renewable term. At the constituency level, each of the 343 electoral districts is managed by a Returning Officer (RO), appointed by the CEO, who oversees electoral operations within the district.<sup>11</sup> Deputy Returning Officers (DROs) and Poll Clerks (PCs) are responsible for organizing and administering voting at polling stations.

All ODIHR NAM interlocutors expressed a high level of trust in the integrity of the election administration at all levels, and conveyed confidence that all aspects of the electoral process, including the election day procedures, would be professionally managed by Elections Canada. Election officials met by the ODIHR NAM at the national and district level emphasized that the continuous operations of the election administration allowed critical preparations to be underway as soon as, and in some cases before, the early election was formally called, including the process of confirming adequate sites for regional offices and polling locations, and initiating the recruitment of a high volume of temporary staff.

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<sup>9</sup> The most recent redistribution process began in October 2021, following the [2021 Census of Population](#), and was completed on 27 September 2023. The new electoral boundaries took effect for this election.

<sup>10</sup> Section 2.2.iv of the Council of Europe's Venice Commission's [2002 Code of Good Practice in Electoral Matters](#) recommends that "the permissible departure from the norm should not be more than 10%, and should certainly not exceed 15% except in special circumstances (protection of a concentrated minority, sparsely populated administrative entity)". See all [official reports on the Elections Canada website](#).

<sup>11</sup> ROs manage the electoral operations at the constituency level, including the establishment of polling locations, recruitment and training of polling staff, and aggregation and validation of results within the electoral district. ROs are appointed by the CEO through open competition among eligible voters for a fixed ten-year term, and are required to sign a code of conduct on abstention from political activities. To support their work, Elections Canada deploys Field Liaison Officers throughout the country to provide operational guidance and report on local developments throughout the election period.

Some interlocutors noted continued challenges in facilitating the polling process for voters in remote and rural locations.

Elections Canada is an independent, non-partisan institution that reports directly to parliament. Its broad authority includes the maintenance of the National Register of Electors, training and support of ROs, the oversight of campaign finance, as well as the dissemination of public information. The CEO develops recommendations on potential legislative and policy reforms following each election, and Elections Canada maintains a number of advisory bodies.<sup>12</sup> The agency provides extensive guidance to contestants and voters, including comprehensive information relating to all aspects of the electoral process and legislation, which is detailed on the Elections Canada website. Public education campaigns are conducted in 33 heritage and 17 Indigenous languages, and include information in multiple accessible formats for persons with sensory disabilities, including large print, Braille, audio files, full transcription, open captioning, and sign language interpretation.

Following the 2021 federal election, Elections Canada launched the Indigenous Electoral Services Review to identify opportunities to strengthen and improve election information, resources and services in Indigenous communities. Elections Canada informed the ODIHR NAM that it has increased the number of polling sites and the presence of election officials in and in proximity to Indigenous communities to enhance the accessibility and effectiveness of these services.

The law provides for multiple voting methods. Voters may cast their ballots in person at their assigned polling station on election day. Advance voting will be available in polling stations over a four-day period, from 18 to 21 April, at designated advance polling locations. Voters may also vote in person at any local Elections Canada office across the country until 22 April at 18:00. Additionally, voting by mail is available to all eligible electors residing in Canada or abroad, with applications required by 22 April. To facilitate the autonomous participation of voters with disabilities, Elections Canada implements a range of services and measures to enhance accessibility throughout the electoral process and holds a legal obligation to study and test assistive voting technologies designed to meet the needs of persons with various types of disabilities. ROs are required to select polling station sites based on detailed accessibility criteria.

In September 2023, the government established the Public Inquiry into Foreign Interference in Federal Electoral Processes and Democratic Institutions. The Public Inquiry issued a final report and recommendations on 28 January 2025, identifying vulnerabilities in party nomination processes and political financing, as well as challenges in information-sharing among state institutions. While the Inquiry found no evidence of interference that would have affected the overall outcome of recent elections, it highlighted the need for increased transparency, enhanced institutional coordination, and improved safeguards to protect democratic institutions. Many ODIHR NAM interlocutors cited the relevance of the report for future electoral reforms.

The Security and Intelligence Threats to Elections (SITE) Task Force, comprising senior representatives of intelligence, cybersecurity, and law enforcement agencies, co-ordinates threat monitoring and information-sharing before and during the electoral process and may issue public announcements to inform the public of incidents that threaten the integrity of the election.<sup>13</sup> The mandate of the task force was expanded in 2023 and 2024 to include the monitoring of by-elections and leadership contests. Following a recommendation of the Public Inquiry into Foreign Interference and a directive of the Clerk

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<sup>12</sup> Including groups comprising disability organizations, political parties, educators, and other electoral partners.

<sup>13</sup> Such statements are subject to a high threshold and are only issued in cases where the threat is both credible and capable of undermining public confidence. The decision to make a public announcement is made by consensus among a [panel of five senior officials](#), including the Clerk of the Privy Council, the National Security and Intelligence Advisor to the Prime Minister, and the Deputy Ministers of Foreign Affairs, Public Safety and Justice.



of the Privy Council to increase the transparency of its work, the Task Force has introduced more frequent public communications and, during this election, holds weekly media briefings.

#### **D. VOTER REGISTRATION**

All citizens aged 18 years or older by election day, except the CEO, are eligible to vote. Elections Canada maintains a permanent National Register of Electors, which is continually updated using federal, provincial and territorial data sources, and contains records for some 28 million citizens. While most eligible voters are automatically included, registration is not universal, and some first-time voters or those with unregistered changes must proactively register or update their records. Voter lists are extracted by Elections Canada from the National Register ahead of each election and distributed to ROs. Voters can, at any point in the year, register, update their records or request removal from the voter lists online, by mail, or at their local Elections Canada office. Eligible voters can also register at polling stations during early voting or on election day by proving their identity and residence. All ODIHR NAM interlocutors expressed confidence in the accuracy of voter lists and in identity safeguards at polling stations.<sup>14</sup> However, some noted that members of Indigenous communities and first-time voters are often registered at lower rates than the general population.<sup>15</sup> To encourage early engagement and improve registration rates among youth, Elections Canada maintains a dedicated database that allows citizens aged 14 to 17 to pre-register, enabling them to be automatically added to the National Register upon reaching voting age.

Voter Information Cards, issued to every registered voter by Elections Canada, provide practical details about where and when to vote, including the address of the assigned polling station, and indicate whether the location is accessible. Voters requiring an accessible location may request a transfer. Contestants may request copies of the voter list data for electoral purposes. The Chief Electoral Officer has previously recommended a review of the scope of access to voter list data, citing concerns over privacy and the need to balance transparency with data protection.

#### **E. CANDIDATE REGISTRATION**

Citizens eligible to vote may stand for election to the House of Commons in one electoral district.<sup>16</sup> While there is no requirement for a candidate to be registered or reside in the constituency in which they are running, they must have established residency in Canada. Certain federally-regulated employers are legally obliged to grant a leave of absence to employees seeking nomination or running as candidates.

Candidates may be nominated by political parties or may register to stand independently. The deadline for candidate registration is set at 21 days before the election day. In order to register, prospective candidates must submit nomination forms with the names, addresses, and signatures of at least 100 registered voters resident in the electoral district or 50 voters in constituencies designated as sparsely populated.<sup>17</sup> A voter may sign in support of multiple contestants. Elections Canada maintains an online

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<sup>14</sup> Valid forms of voter identification include either one original federal, provincial or local, government-issued photo ID that includes their name and current residential address, or two pieces of identification authorized by the CEO, both showing the voter's name and at least one showing their residential address. Voters without a valid form of identification may still vote by making a written declaration and having another registered voter vouch for their identity and address.

<sup>15</sup> Elections Canada's [2024 Indigenous Electoral Services Review final report](#) noted that "[p]roof of identification (ID) and residency requirements continue to be some of the biggest barriers to participation".

<sup>16</sup> Ineligible citizens include holders of certain official positions (who must resign in order to stand), individuals serving prison sentences or previously convicted of election-related offences, and candidates from past elections who failed to submit required campaign finance reports.

<sup>17</sup> Each signature must be made in the presence of a witness. Data on voters who have signed in support of prospective candidates is verified at the RO offices.

platform, the Political Entities Service Centre, that enables the electronic submission of nomination documents. ODIHR NAM interlocutors did not express any concerns with the candidate registration procedures, but a few noted that security vulnerabilities, including with respect to potential foreign interference, have been identified in party nomination processes.

Political parties are not legally required to ensure gender parity among their nominated candidates, nor does the legal framework mandate the publication of gender-disaggregated data. Some ODIHR NAM interlocutors expressed concern that parties remain less likely to nominate women in constituencies which they deem winnable.<sup>18</sup>

## F. ELECTION CAMPAIGN

The official campaign period commenced immediately following the issuance of the writs of election on 23 March 2025, which also resulted in the dissolution of the outgoing parliament. The election date of 28 April establishes a 36-day campaign period, the minimum duration envisaged in the Elections Act. As the election was called early, the legislated pre-election period, applicable only in the context of scheduled elections, did not apply.<sup>19</sup>

ODIHR NAM interlocutors expected the campaign discourse to be dominated by international and economic concerns, including global security and trade tensions, alongside domestic issues such as healthcare, climate policy, housing affordability and the cost of living. One party met by the ODIHR NAM referenced the promotion of rights of Indigenous peoples in its platform.

Canvassing by telephone continues to be a common method of campaign outreach. The Canadian Radio-television and Telecommunications Commission (CRTC) maintains the Voter Contact Registry to ensure transparency in this activity. As mandated by the Elections Act, entities using a calling service provider or an automatic dialling-announcing device must register within 48 hours of initiating their first call. Political parties are also required to publish privacy policies detailing how they collect and use voters' personal data, though these privacy policies are not regulated. Elections Canada and the CRTC have recommended the expansion of the Voter Contact Registry to apply also to SMS and other direct communications, and that parties' policies on the use of personal data should be regulated by some minimum federal requirements.<sup>20</sup> ODIHR has likewise recommended the extension of the Registry to cover other types of mass communications.

The Elections Act mandates that online platforms and social networks must maintain and publish a detailed registry of political advertisements during the election period. This requirement applies to platforms that meet specific thresholds for average monthly domestic Internet traffic.<sup>21</sup> In August 2021, the government, through the office of the Privy Council, adopted a voluntary declaration for major online platforms aimed at encouraging participating platforms to promote transparency around political advertising, counter disinformation, label electoral content, and remove inauthentic accounts. While

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<sup>18</sup> In its [2024 Concluding observations on the tenth periodic report of Canada](#), the UN Committee on the Elimination of Discrimination against Women expressed concern about the insufficient representation of women in political and public life. The Committee recommended that Canada strengthen efforts to promote equal representation of women in politics, including considering the adoption of temporary special measures such as statutory quotas and providing incentives for compliance.

<sup>19</sup> The pre-election period entails specific rules for third-party spending and political advertising.

<sup>20</sup> The British Columbia is the only province that further regulates political parties' use of personal data under its Personal Information Protection Act.

<sup>21</sup> Three million unique visitors in Canada for English-language platforms, 1 million unique visitors in Canada for French-language platforms, or 100,000 unique visitors in Canada for platforms in other languages.

several ODIHR NAM interlocutors welcomed this initiative, some noted that the voluntary and non-binding nature of the declaration limits its enforceability and long-term impact.

ODIHR NAM interlocutors acknowledged the growing challenge posed by disinformation campaigns, particularly through online and social media platforms, but also within segments of traditional media. While the media environment in Canada remains pluralistic and generally trusted, several interlocutors noted that the spread of false or misleading narratives could undermine voter confidence, and cited instances of sexist and racist rhetoric targeting women and minority candidates. Elections Canada conducts public information campaigns to educate voters on how to verify electoral information and identify misleading content, and has issued a recommendation, endorsed by the Hogue Commission, to extend the definition of what qualifies as a misinformation offense in the legal framework. Agencies comprising the SITE Task Force monitor the information space across multiple domestic and foreign-based platforms. During the Liberal Party leadership contest in February 2025, the Task Force issued its first public warning related to attempted foreign interference in the leadership campaign, and a subsequent warning in April 2025 identified a disinformation campaign against Prime Minister and Liberal Party Leader Mark Carney.<sup>22</sup>

## **G. POLITICAL PARTY AND CAMPAIGN FINANCE**

Political parties are financed through a combination of private donations and loans. Income and expenditures are subject to annual reporting and disclosure requirements. Only citizens and permanent residents are permitted to make contributions.<sup>23</sup> Political parties may access additional public funding through reimbursements of certain election and accessibility-related expenses.

Election campaigns can be financed through party funds, loans, or donations from citizens and permanent residents. Contributions from foreign individuals or entities are prohibited. Elections Canada sets expenditure limits for parties and candidates based on the number of registered electors in each electoral district, and these limits include expenses for online political advertising. Candidates who are elected or receive at least 10 per cent of valid votes in their constituency are entitled to public reimbursement of up to 60 per cent of their campaign expenses. Additionally, certain personal expenses, such as childcare, care for individuals with physical or psycho-social disabilities, and expenses related to a candidate's disability, are reimbursed at a rate of 90 per cent. Political parties met by the ODIHR NAM did not express concerns regarding the system of campaign finance regulation.

In February 2025, Elections Canada issued updated guidance on political financing rules for candidates and official agents. Contrary to a previous ODIHR recommendation, contestants are not required to submit interim reports on campaign spending before election day. However, political parties and candidates must file detailed post-election financial reports, with deadlines set at eight months for parties and four months for candidates following election day. Elections Canada is responsible for monitoring and enforcing campaign finance regulations, and may refer potential violations to the Commissioner of Canada Elections for investigation (see also *Election Dispute Resolution*). Non-compliance with campaign finance obligations may result in administrative and criminal sanctions, including fines, imprisonment, deregistration, liquidation of assets, and disqualification from future

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<sup>22</sup> On 7 February 2025, the Task Force indicated that Global Affairs Canada's Rapid Response Mechanism had identified a covert, coordinated disinformation campaign, originating on the Chinese platform WeChat, against candidate Chrystia Freeland. On 7 April, the Task Force announced that a campaign originating on the same platform had been identified, targeting Mr. Carney.

<sup>23</sup> For 2025, individuals may contribute up to CAD 1,750 annually to each registered party, and an additional CAD 1,750 collectively to the candidates, nomination contestants, and registered associations of that party. Contributions of up to CAD 1,750 are also permitted per leadership contest and per independent candidate. 1 Canadian dollar (CAD) is approximately 0.64 EUR.

electoral participation. The CEO has recommended that political parties should be required to submit documentary evidence with their financial returns.

Any third party which incurs more than CAD 500 in election expenses related to partisan activities, such as advertising, surveys, or organized events is required to register with Elections Canada. For the 2025 early federal election, third-party expenses are capped at CAD 602,700 nationwide, or CAD 5,166 per electoral district.<sup>24</sup> Registered third parties are subject to interim and final reporting obligations and must disclose all contributions upon receipt. Collusion between political parties and third parties on campaign activities or expenditures is prohibited under the Elections Act.

## **H. MEDIA**

Freedoms of expression and of the press are guaranteed by the Constitution. Media coverage of election campaigns is regulated by the Elections Act, the 1991 Broadcasting Act, and regulations issued by the CRTC. Canada enjoys a pluralistic media landscape with 250 television (TV) stations, some 1,000 radio stations, and a wide range of print media. The Canadian Broadcasting Corporation (CBC), the public broadcaster, operates national services in English and French, through two TV channels and four radio networks. CBC also broadcasts content in eight indigenous languages across its regional services, which are particularly important in reaching remote areas with limited access to commercial broadcasting. Online media, and especially social networks, continue to grow as key sources of political information, particularly among younger audiences.

The Elections Act provides for the allocation of free and paid broadcasting time to registered political parties during the election period. The Broadcasting Arbitrator, an independent authority appointed by the CEO, is mandated to allocate the free broadcasting time available on licensed radio and TV stations to eligible parties and to ensure equitable access to paid airtime. The Arbitrator also issues guidelines to broadcasters and political parties concerning the application of broadcasting provisions under the Elections Act. While broadcasters retain editorial discretion over their news coverage, licensed broadcasters are required to comply with time allocation rules and must not discriminate against any registered party in the sale of airtime. For this election, following an established practice, half of the available 390 minutes of paid advertising time of each broadcaster is to be allocated equally to registered political parties, and the remaining half is to be apportioned according to previous election results. Third parties are permitted to purchase airtime for political advertising and are legally required to clearly identify their authorization of the message.

The CRTC issues additional guidance to political contestants, provides information on the allocation of airtime submitted by the Broadcasting Arbitrator, and meets regularly with the Commissioner of Canada Elections. The CRTC does not conduct monitoring of the quantitative compliance of broadcasters with airtime regulations, but interlocutors noted that this process would be largely self-regulated by the mechanism for complaints submitted by political parties.

Established in 2018, the Leaders' Debates Commission (LDC) is mandated to organize two national leaders' debates during each federal election period, one in French and one in English.<sup>25</sup> The LDC revised its debate participation criteria for this election, requiring that party leaders must meet at least two of three conditions: the party's representation in the House of Commons at dissolution, the nomination of candidates in at least 90 per cent of ridings as of 28 days before the date of the general election, or a minimum of 4 per cent national support based on public opinion polls over a specified

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<sup>24</sup> An increase of approximately 14.6 per cent since the 2021 federal election.

<sup>25</sup> For the 2025 federal election, the debates are scheduled for 16 April (French) and 17 April (English), both held at the Maison de Radio Canada in Montréal.

ten-day period. Based on these criteria, the leaders of the five parliamentary parties qualified. While debate broadcasters retain editorial independence over the format and content, the LDC issued guidance that the debate moderators have prior experience in national debates and that participants' interventions should not be unduly limited by time constraints, and requires that minimum accessibility standards be met, including interpretation in sign language and Indigenous languages. Free online streaming of the debates encourages broad accessibility.

## **I. ELECTION DISPUTE RESOLUTION**

The Commissioner of Canada Elections is appointed by the CEO for a single, non-renewable ten-year term and is responsible for enforcing compliance with the Elections Act, including conducting investigations into potential violations.<sup>26</sup> Complaints regarding potential violations may be submitted by individuals or organizations, including referrals from Elections Canada, and through various channels, including in person, by phone, mail, or electronically. The Office of the Commissioner informed the ODIHR NAM of an increased number of complaints and applications submitted by the public compared to previous federal election periods, which some interlocutors, including the Commissioner, considered an indication of growing public awareness of electoral rights and avenues for redress.

Upon receiving a complaint, the Commissioner assesses whether there are sufficient grounds to initiate an investigation. To support investigations, the Commissioner may seek judicial authorization to obtain a search warrant or a production order for documents and may also apply to a court to compel testimony under oath. For less serious infractions, the Commissioner has the authority to negotiate compliance agreements, accept undertakings, issue notices of violation with administrative monetary penalties, or seek injunctions. In cases involving serious offences, the Commissioner may refer the matter to the Director of Public Prosecutions, who is responsible for initiating and conducting prosecutions and any related appeals. Contrary to a prior ODIHR recommendation, there are no election-specific timelines for the adjudication of such cases. The Office of the Commissioner informed the ODIHR NAM that the efficiency of its work would be further enhanced if the investigative tools permitted in its criminal investigations, such as the right to order the preservation of evidentiary materials and documents, applied also to its administrative investigations.

The Elections Act outlines a range of electoral offences, including their elements, levels of intent, and applicable sanctions, which may include fines, imprisonment, or both. The Elections Act provides candidates and voters with the right to contest election results through judicial proceedings in a competent court. While the Elections Act does not establish an automatic right of appeal, decisions may be appealed to the Supreme Court of Canada under specific legal grounds. The Supreme Court may hear such cases where matters of public or legal importance are at stake, though no statutory deadline is imposed for its deliberations.

## **J. CITIZEN AND INTERNATIONAL OBSERVERS**

Candidates have the right to appoint representatives, commonly referred to as scrutineers, to observe voting procedures and the counting of ballots at the polling stations, as well as the RO and Elections Canada offices. Political parties met by the ODIHR NAM indicated their intention to appoint scrutineers to polling stations. The legal framework does not explicitly provide for either citizen or international election observation. ODIHR has previously recommended that the law be amended to explicitly guarantee access for both, in line with OSCE commitments. However, the authorities assured the

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<sup>26</sup> On 13 June 2022, the CEO announced the appointment of the current Commissioner, with the term beginning on 15 August 2022.

ODIHR NAM that any potential ODIHR observation activity would be facilitated in line with OSCE commitments.

#### **IV. CONCLUSIONS AND RECOMMENDATIONS**

The majority of ODIHR NAM interlocutors, while supportive of a potential ODIHR observation activity and recognizing the value of an external review, were of the opinion that an observation activity was not necessary. The ODIHR NAM noted limited changes to the legal framework since the previous federal election, as well as increased efforts and co-ordination among national institutions to review the security of electoral processes. Interlocutors consistently expressed confidence in the integrity, professionalism and transparency of the election administration, emphasizing a stable electoral environment and the absence of significant challenges that would warrant a broader observation presence. A few concerns were raised about potential disinformation campaigns and the integrity of the information space during the election period, and several interlocutors noted that the electoral legal framework could be further reviewed and refined to address emerging challenges.

Based on findings in this report, ODIHR does not recommend the deployment of an election observation activity for the 28 April 2025 early federal election. ODIHR reiterates that a number of its previous recommendations remain valid and stands ready to support the authorities through other tools available, including in the form of a legislative review.

## **ANNEX: LIST OF INTERLOCUTORS**

### **Global Affairs Canada**

Alison Grant, Director General, International Security and Strategic Affairs  
Gerald Coulombe, Deputy Director, Europe/NATO/OSCE  
Leo Bartlett, Senior Policy Analyst, Regional Security & Defence Relations

### **Privy Council Office – Democratic Institutions**

Sarah Stinson, Director of Operations  
Rachel Pereira, Director, Electoral and Senatorial Policy  
Bradley Eddison, Associate Director, Protecting Democracy Unit

### **Elections Canada, Office of the Chief Electoral Officer**

Stéphane Perrault, Chief Electoral Officer  
Karine Morin, Senior Director, Integrity, Regulatory Policy and Parliamentary Affairs  
Michal Khan, Analyst, International, Provincial and Territorial Relations

### **Office of the Commissioner of Canada Elections**

Caroline Simard, Commissioner of Canada Elections  
Brahim Achoutal, Deputy Commissioner; Public Affairs, Policy and Integrated Services  
Michelle Laliberté, Director; Communications and External Relations  
Jacinthe Dumont, Manager; Policy and Parliamentary Affairs Manager, Communications and Policy

### **Elections Canada, Ottawa Centre (Ontario)**

Gail Ann Lynch, Returning Officer

### **Security and Intelligence Threats to Elections (SITE) Task Force**

Saliou Babou, Director of the Rapid Response Mechanism, Global Affairs Canada  
Lara Babbie, Senior Advisor to the Senior Official for Cyber, Digital and Critical Technology, Global Affairs Canada

Senior representatives to SITE from:

- The Canadian Security Intelligence Service
- Communications Security Establishment
- The Royal Canadian Mounted Police

### **Broadcasting Arbitrator**

Monica Song, Broadcasting Arbitrator

### **Canadian Radio-Television and Telecommunications Commission**

Alain Garneau, Director, Compliance and Enforcement  
Joëlle Bernier, Manager, Strategic Policy and International Affairs  
Caroline Poirier, Manager, French Radio Policy and Applications  
Ricardo Wicker, Legal Counsel  
Lauren Corput, Senior Analyst, Strategic Policy and International Affairs

### **Canadian Broadcasting Corporation**

Shaun Poulter, Executive Director, Strategy, Public Affairs and Government Relations

### **Leaders' Debates Commission**

Michel Cormier, Executive Director

**Political Parties**<sup>27</sup>

Stéphane Bergeron, Bloc Québécois

Heather McPherson, New Democratic Party

Jennifer Pedersen, Legislative and Policy Advisor, New Democratic Party

**Civil Society**

Brent Jolly, President, Canadian Association of Journalists

Lindsay Brumwell, Interim Executive Director, Equal Voice

**International Community**

Representatives of diplomatic missions of the OSCE participating States

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<sup>27</sup> The ODIHR NAM offered meetings to all parliamentary political parties.