



January 18, 2024,

Sent via email

Hon. Arif Virani
Attorney General and Minister of Justice
Department of Justice
284 Wellington St.
Ottawa, ON K1A 0H8

Hon. Dominic LeBlanc
Minister of Public Safety, Democratic
Institutions and Intergovernmental Affairs
Ministry of Public Safety
269 Laurier Avenue West
Ottawa ON K1A 0P8

Dear Ministers:

Re: Consultation on Foreign Interference Threats

I am writing you today on behalf of the [Association of Municipal Managers, Clerks and Treasurers of Ontario \(AMCTO\)](#) regarding the Government of Canada's consultation on foreign interference threats on behalf of our members many of whom are responsible for planning and conducting local government elections in Ontario.

AMCTO represents excellence in local government, management, and leadership. For over 85 years we have provided education, accreditation, leadership, and management expertise for Ontario municipal professionals. With 2,200+ members working in municipalities across the province, we are Ontario's largest association of local government professionals.

Our Association is recognized as an influential voice that has maintained a productive relationship with government by helping ensure the professional expertise and local understanding of our members is utilized to improve existing and new legislation, policy, and programs to ensure successful local delivery.

Our view is that protecting the democratic process at all levels of government is critical and we appreciate that the Government is considering impacts at all orders of government. The issue of foreign interference has been raised in discussions with our member-driven working group which has been reviewing Ontario's [Municipal Elections Act, 1996](#) with the goal of making recommendations for legislative and service changes to Ontario's Minister of Municipal Affairs and Housing this Spring well ahead of the 2026 municipal and school board elections.

We would like to take this opportunity to highlight a few points of interest for our members which we would appreciate the Government taking into consideration as it contemplates legislative change:

- Ultimately, issues related to foreign interference in democratic processes should be managed at the federal level.

- Should legislation be introduced to authorize CSIS to disclose information to those outside the Government of Canada to increase awareness and resilience against foreign interference, there should be a mechanism to expand this information sharing to local governments which are responsible for managing their local elections. There are 414 municipalities in Ontario which run elections every four years.
- Protocols for such notification would need to be developed to ensure that information flows to local election administrators whether directly or by way of the Provincial government.
- Protocols and information-sharing should be supported by tools and training on dealing with and managing threats of foreign interference utilizing best practices.
- Clear guidance and training on how to engage local law enforcement in investigation and prosecution of such threats and incidents will be critical to supporting local election administrators, especially if these investigations arise during the election period itself and could impact the outcome of the election.
- Any future federal legislation will need to contemplate compatibility with provincial electoral frameworks. Provinces will need to ensure alignment with federal statutes to ensure complementary provisions and that local election administrators have the legislative tools necessary to deal with threats and manage incidents.
- Disclosure should include information on those charged to ensure that local election administrators are able to comply with requirements for candidate, contributor and third-party advertising registration and certification under Ontario's *Municipal Elections Act, 1996*.

Should the Government move forward with legislative changes, AMCTO would be happy to provide more specific feedback at that time. Should you wish to discuss any of AMCTO's preliminary comments, please reach out to David Arbuckle, Executive Director (dabuckle@amcto.com) to arrange a meeting.

Sincerely,

[Originally Signed by]

Stephen O'Brien, AOMC
President, AMCTO

Cc: Hon. Paul Calandra, Minister of Municipal Affairs and Housing, Ontario
Martha Greenberg, Deputy Minister, Municipal Affairs and Housing, Ontario
Scott Pearce, President Federation of Municipalities of Ontario
Colin Best, President Association of Municipalities of Ontario