



Canadian Association of Chiefs of Police
Association canadienne des chefs de police

Submission to the House of Commons' Standing
Committee on Public Safety and National Security

**Bill C-12 — Strengthening Canada's Immigration System and
Borders Act**

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On behalf of:

**Canadian Association of Chiefs of Police
and
Ontario Provincial Police**

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GOVERNING CANADA'S BORDERS IN CHANGING TIMES

Honourable members of this Committee:

Thank you for the opportunity to appear before you today. I come to speak on behalf of the Ontario Provincial Police and, more broadly, the members of the Canadian Association of Chiefs of Police (CACP).

My role is not to comment specifically on matters of federal responsibility, although they are intrinsically tied to this legislation and our overall mission in public safety. I will focus on the critical areas in which the current and associated legislation (C-12 and C-2), the mandates and roles of our federal law enforcement and intelligence partners merge with those of Canadian law enforcement.

With that in mind, I am specifically focusing on the public safety threats of transnational organized crime, terrorist and extremist entities, the convergence of these actors, malevolent foreign actors, transnational repression and the devastating impact of illicit commodities including drugs, weapons, human trafficking, and transnational fraud (including cryptocurrency), trade-based and traditional money laundering that impact public safety and the integrity of our criminal justice system on a daily basis.

Border security, national security, the integrity of our immigration system and the other related security measures referred to in the title of this legislation are key factors in public safety. This includes the safety and security of our citizens in their daily lives as they are impacted by crime and also the more elusive threats of transnational crime, terrorist conspiracies or foreign actor interference. It is the detection, prevention and mitigation of these nefarious impacts on Canadians and the disruption of the actors that perpetrate them that is our joint responsibility — our mission.

I wish to communicate clearly about the role of the OPP and Canada's police services in the contemporary operational environment, the complexity of our task, the challenges our officers and investigators face every day, and how legislation like Bill C-12, and other factors included in Bill C-2, are an absolute requirement for us to fulfill our mission and enhance the safety of Canadians. Some are, in my opinion, simply common sense.

By way of introduction, the OPP is comprised of approximately 10,000 members and is the second largest police service in Canada and one of the largest deployed services in North America. While it provides frontline services for over 300 communities and is responsible for vast territories that include marine and land border points, critical infrastructure and transportation in proximity to key points of entry, the OPP also provides a host of specialized services in terms of intelligence and investigative capacity specific to transnational organized crime and terrorism as well as sophisticated investigative supports in relation to cybercrime, physical and electronic surveillance and numerous other related services.

I want to start with something that may seem distant from our provincial mandate, but which is shaping the context in which border security and law enforcement operate across this nation and that is the changing geopolitical landscape.

THE CHANGING GEOPOLITICAL LANDSCAPE

Recently, we have watched significant developments in international relations that merit our attention. The United States conducted military operations in the Caribbean that resulted in civilian casualties. In response, trusted intelligence partners—the United Kingdom and Colombia—have signaled concerns about operational practices and have adjusted their intelligence cooperation with the United States. We have seen escalations in global conflict, demographic shifts, polarization, a lack of societal cohesion, and increasing impact domestically by foreign actors that impact trust in our public institutions.

These events are significant not because the Ontario Provincial Police, or other services, have a role in foreign policy, but because they illustrate a broader reality: the geopolitical environment has altered; events in the Middle East, Ukraine or Syria impact public safety in small towns.

Further, partnership frameworks that have governed international security for decades are shifting. For Canadian law enforcement, this means we must be thoughtful about how we develop our own operational capacity, how we leverage our own intelligence resources, how our legislative norms ensure interoperability with allies — ultimately how we build and maintain national and border security within the international environment, enhancing the safety of our communities at home.

This is not cause for alarm. It is simply recognition that our society, the public safety threats it presents, as well as the remedies required are more complex. Partnerships require more careful management, and Canadian law enforcement must be increasingly nimble in our operational effectiveness.

SECTION ONE: THE OPERATIONAL REALITY AT CANADA'S BORDERS

Against this background of geopolitical change, I want to describe the very concrete operational challenges that Canadian law enforcement agencies face every single day. These are not theoretical challenges but operational realities.

By way of example: Just this month, the Ontario Provincial Police seized 46 kilograms of fentanyl in a single operation. This represents one successful enforcement action against trafficking networks that, by federal health estimates, have resulted in approximately (18 deaths per day) or 1,377 apparent opioid toxicity deaths in the first quarter of 2025.¹ The OPP and numerous police services have been very engaged in targeting these trafficking networks especially in relation to fentanyl and cocaine. Our success in countering these threats is of paramount importance.

Threat One: Transnational Organized Crime Networks

The first reality is that sophisticated criminal organizations — Mexican cartels, South American trafficking networks, Chinese production operations, and Transnational Criminal Organizations in general — are using Canadian territory as a critical node in their global supply chains. These are not traditional drug trafficking and money laundering organizations. They operate with unprecedented sophistication. This resulted in the “listing” of seven criminal organizations as terrorist entities in 2025.

Intelligence indicates that at least seven major transnational criminal organizations maintain operations within Canada. They have systematically embedded operatives within Canadian shipping logistic chains and export facilities. They have cultivated relationships with corrupted public sector employees (port workers, warehouse supervisors, transportation officials). They understand Canadian supply chain vulnerabilities, and they exploit them methodically.

The challenge is not that organized crime exists. The challenge is the scale, the sophistication, and the integration of these networks into legitimate commercial infrastructure. A single corrupted supervisor or long-haul trucker can enable multiple trafficking operations, each generating hundreds of thousands of dollars in criminal proceeds. The changes proposed in C-12 will assist in this regard, and we welcome them, but they fall short.

The most sophisticated investigative technique in organized crime investigations is effective and reasonable lawful access, including interception of criminal communications as warranted under Part VI of the *Criminal Code*. But Canadian law enforcement faces monumental obstacles in this regard. Criminals communicate on encrypted social media applications — that is how they execute money laundering schemes, terrorist conspiracies and acts of murder. Yet, our legislation does not recognize and act on the evolution of technology and the tools and procedures required to disrupt these conspiracies.

¹ Data sets: 12 months (April 2024 to March 2025) 6,601 deaths, 21% lower than the previous 12 months, **18 Deaths per day on average**

- 1,377 apparent opioid toxicity deaths have been reported so far in 2025 (Jan to Mar), 95% were accidental
- 63% involved fentanyl and 51% involved fentanyl analogues

Source: Government of Canada <https://health-infobase.canada.ca/substance-related-harms/opioids-stimulants/>

As the officer responsible for this capacity in the Ontario Provincial Police and the joint force Joint Technical Assistance Centre, I can assure you that this is a daily impediment with real life consequences. Bill C-2 contained the lawful access updates that are necessary to be successful in combatting modern, technologically-enabled crime, protect victims and prosecute offenders.

Threat Two: Exploitation of First Nations Territories

The second reality is that First Nations communities and territories adjacent to our border are being systematically utilized and exploited as smuggling corridors and contraband staging zones.

In May of 2025, the OPP Project Panda disrupted a criminal network operating within Six Nations and uncovered transnational criminal organizations manufacturing counterfeit products (including up to 500 million counterfeit cigarettes annually) on First Nations land. These operations employ community members, creating a cycle where economic incentive overwhelms longer-term community welfare.

Akwesasne, Tyendinaga and communities along the St. Lawrence Seaway have similarly become primary smuggling routes for firearms and have been host to production of illicit commodities. In October 2025, the OPP's Project CHASE executed search warrants seizing over 110,000 marijuana plants with a street value of over \$120 million.

This is not only a First Nations law enforcement problem. This is an effective exploitation of opportunities. This is a threat that will also be faced in areas of burgeoning development such as Ontario's Ring of Fire. Addressing this challenge requires both effective enforcement and collaboration. Bill C-12 provides tools for border security and the enforcement dimension, and they will assist. Here too, legislative authority for sophisticated lawful intercept, as outline in Bill C-2 will assist in intelligence acquisition, criminal investigation and prosecution.

Threat Three: Transnational Repression and Foreign Interference

The third threat is one that law enforcement has only recently begun to fully operationalize: Foreign governments are conducting security operations within Canada through proxy networks and organized crime groups. This activity is having a devastating impact on Canadians, especially those within certain diasporas. This was expertly addressed by the CSIS Director in his address last week.

In September of this year, the Bishnoi Gang was designated as a terrorist entity. This organization operates globally with approximately 700 members, including substantial presence in Ontario. It is simultaneously a criminal organization engaging in extortion, assault, and murder, and a proxy for transnational repression, targeting individuals based on their political affiliations or government criticism.

Chinese intelligence services operate surveillance networks within Canadian diaspora communities. Iranian state actors coordinate with criminal groups for assassination and intimidation of regime opponents. Pakistani security services conduct surveillance and harassment operations against political dissidents.

The line between organized crime investigation and national security has blurred — it is a convergence. This requires law enforcement to develop new investigative protocols and coordination frameworks that did not previously exist.

Many of the tools cited in C-12 will be of assistance in countering this threat. But again, I must stress that the investigative opportunities afforded by C-2 are a must. Lawful electronic interception is an absolute must in modern investigations. And the surveillance must have the capacity to counter the communications between modern smartphones and the social messaging applications that permit encrypted communication and anonymization. This is not warrantless surveillance. It is merely the continuance of previous warranted authorities consistent with modern communicative norms.

Threat Four: Border Infrastructure Vulnerabilities

The fourth reality is that our border infrastructure — marine ports, land crossings, long-haul trucking networks — operates with security capacity that is insufficient to the volume and sophistication of modern smuggling operations.

Our ports of entry process massive volumes of legitimate commercial traffic. The Great Lakes and St. Lawrence Seaway represent 1,150 kilometers of Ontario water border. Our land crossings, the Ambassador Bridge, Blue Water Peace Bridge, Lewiston-Queenston Bridge, and Sault Ste. Marie International Bridge process hundreds of thousands of vehicle crossings annually. The CBSA conducts meaningful secondary inspection on a very low percentage of this traffic, not due to law enforcement failure, but because the mathematics of comprehensive screening this volume without additional authority and resources simply does not work.

Organized crime understands these statistical probabilities better than we do. Our intelligence and our interdiction have illustrated that they study them deliberately, they identify weaknesses, and they exploit them systematically.

Again, some of the changes in C-12 and the increase in human resources will assist in this regard. And law enforcement has acted to augment border security: In the OPP, Operation 3D has resulted in augmenting RCMP patrols, OPP focused patrols, specific intelligence requirements, provincial fusion of information, and focused investigations related to land and air logistics. This has led to increased seizures.

But real success in this arena requires more than appropriate interdiction and the capacity for search. It requires a fusion of information for all-source intelligence production from the most advanced collection techniques, including lawful intercept. It also requires relentless focus on the fraud and corruption that facilitates a massive logistical capacity for these networks.

SECTION TWO: THE GEOPOLITICAL AND ECONOMIC CONTEXT

I mentioned at the outset that the international environment is shifting. The statement by the CSIS Director, Dan Rogers, underscores the prevalence of polarization, multiple forms of radicalization and the erosion of social cohesion. In essence, the world, including our western alliance and our country, is becoming a more unpredictable and dangerous place. This is both novel and impactful for law enforcement. It creates a bevy of priorities that shift daily with the corresponding alterations in resources. This impact is felt perhaps most keenly in the discipline of intelligence in relation to the domestic impact of foreign conflict in Gaza or Venezuela as well as the influence of transnational criminal organizations from Mexico, Central America or China.

Even the implementation of tariffs and its potential to lead to significant shrinkage of the Canadian GDP impacts the criminal environment. This is not simply a trade policy issue; it has direct law enforcement implications.

Economic disruption increases vulnerability to crime. When businesses close, when individuals lose employment, when households face financial crisis, organized crime networks have a larger pool of economically vulnerable people to recruit for smuggling, money laundering, and other criminal activity. This is not speculation; this is how organized crime networks operate in economically stressed communities.

Additionally, the international partnership environment that has shaped law enforcement cooperation is experiencing stress.

For Canadian law enforcement, this means we must think carefully about:

- how we develop our own intelligence capacity;
- how we build border security effectiveness with allies; and
- how we maintain operational continuity if international relationships continue to shift.

SECTION THREE: HOW BILL C-12 ENABLES OPERATIONAL EFFECTIVENESS

Against this operational and geopolitical backdrop, Bill C-12 provides essential tools that remove current legal obstacles and enable more effective law enforcement response.

FOUR OPERATIONAL IMPROVEMENTS

Improvement One: Border Security Authority

Bill C-12 expands Canada Border Services Agency authority to access warehouses, trans-shipment facilities, and export staging zones where we have intelligence indicating organized crime activity.

Currently, when our intelligence indicates that a shipping warehouse is being used to stage illicit commodities for export, the CBSA lacks direct statutory authority to conduct inspection without warrant procedures that require time and can be circumvented through legal process.

C-12 creates clear statutory authority. This enables the CBSA to move more rapidly on intelligence. For police services, this creates coordination opportunities: our organized crime investigators can share intelligence with CBSA partners, enabling federal colleagues to conduct operations that identify and disrupt transnational organized crime staging operations before contraband leaves Canada.

Improvement Two: Intelligence Sharing and Information Access

Bill C-12 establishes statutory authority for Immigration, Refugees and Citizenship Canada (IRCC) to share personal information with provincial law enforcement agencies for law enforcement purposes.

This matters operationally because it eliminates delays in areas of crucial importance. Currently, when an OPP investigator needs immigration records to confirm identity, immigration status, or border crossing history, we must submit to the necessary filing requests that take time to process. C-12 enables direct access to IRCC systems, allowing investigators to confirm information with significant acceleration compared to current procedures.

More importantly, it enables the CBSA to share information about criminals (i.e. sex offenders) crossing borders, allowing provincial law enforcement to identify and track individuals before they engage in predatory conduct in Canadian communities. This is straightforward public safety work.

Improvement Three: Financial Intelligence Integration

Bill C-12 substantially upgrades the anti-money laundering regime through mandatory enrollment, expanded reporting obligations, and enhanced information sharing with law enforcement.

Transnational organized crime networks (including terrorists) generate revenues measured in billions of dollars. That money must move through financial systems. Currently, FINTRAC intelligence sharing with provincial law enforcement is episodic and delayed.

C-12 creates statutory authority for more systematic sharing of suspicious transaction reports involving money laundering linked to organized crime and sophisticated fraud operations. For OPP anti-terrorism, intelligence, and organized crime units, this means faster identification of financial flows associated with transnational criminal operations, enabling investigators to disrupt money laundering infrastructure.

Improvement Four: Precursor Chemical Control and Undercover Operations

Bill C-12 enables rapid updating of controlled precursor chemical scheduling, preventing transnational criminal organizations from simply substituting banned chemicals with newly-synthesized alternatives. It also codifies law enforcement exemptions for undercover operations, protecting officers conducting controlled substance handling during fentanyl investigations.

SECTION FOUR: A NEEDS ASSESSMENT

I want to be transparent with this Committee: Bill C-12 addresses important operational gaps, but it is not a comprehensive solution.

What We Need

1. **VIABLE TECHNOLOGICAL UTILITY – LAWFUL ACCESS (INTERCEPT):** There is a need to modernize Canadian legislation and policy mechanisms to match the pace of technological innovation in matters related to public safety. The Canadian legislative environment is slow to adapt, and this delay presents daily risks, evidentiary losses and public safety impacts. Criminals communicate and conspire as the rest of society does, via social messaging applications, not archaic telephonic communication. Law enforcement encounters encryption, anonymization and closed message ecosystems, all of which require nimble innovation, acquisition and utilization in a timely fashion. Failure to engage in these sophisticated investigative techniques, and to ensure a legislative framework for successful utility, undermines success in terms of public safety. For two decades, efforts to modernize legislation have stalled while criminals have embraced innovation. This must change.

2. **HUMAN RESOURCE ENHANCEMENT:** The federal government has announced funding for 1,000 new RCMP officers and 1,000 new CBSA officers. That is a meaningful and necessary federal investment. If C-12 establishes new information-sharing authority and intelligence frameworks, the Federal Government should consider investments into provincial law enforcement to support the mandate of federal law enforcement. Otherwise, there is risk that the legislation will provide authority without operational effect. Provincially, there will be an operational requirement for federal investments:
 - Investigators trained in financial crime analysis
 - Intelligence analysts specialized in transnational organized crime networks
 - Personnel embedded in federal coordination mechanisms
 - Investment in IT infrastructure enabling secure access to federal intelligence systems
3. **PARTNERSHIP WITH FIRST NATIONS:** We must also acknowledge that Bill C-12 expands law enforcement authority in territories where First Nations governments exercise jurisdiction. Effective border security and organized crime enforcement in First Nations territories requires genuine partnership and collaboration with a common mission.
4. **GEOPOLITICAL ADAPTATION:** Finally, we are operating in an environment where the traditional continental partnership framework is in transition. If trade relationships continue to strain, or if intelligence cooperation continues to be constrained, Canadian law enforcement must maintain effectiveness independent of external relationships. This requires a re-focusing on our individual capacities.

CLOSING: COMMITMENT TO EFFECTIVE, ETHICAL LAW ENFORCEMENT

The Ontario Provincial Police and the members of the Canadian Association of Chiefs of Police are committed to implementing Bill C-12 and operationalizing the enhanced information sharing, intelligence coordination, and organized crime enforcement that this legislation enables. But more is required in terms of legislation to effectively investigate sophisticated transnational threats and maintain border and national security.

We ask Parliament for four commitments in return:

1. An enhanced legislative and procedural capacity for critical, sophisticated investigative techniques and the technological innovation and legal framework required to maintain it. I am referring specifically to electronic interception. We ask for a clear timeline to advance lawful access and related modernization provisions in C-2.
2. Federal funding for provincial law enforcement participation in C-12 implementation as a core component of the legislative strategy.

3. Sustained investment in Canadian criminal intelligence independence, particularly ensuring that Canadian law enforcement does not depend exclusively on partnerships.
4. Genuine consultation with First Nations and partnership with First Nations law enforcement as C-12 is implemented in Indigenous territories.

The contemporary threat landscape is dangerous and unpredictable. Canadians die daily from opioid overdose, with eight-two percent of all apparent opioid toxicity deaths attributed to opioids that were non-pharmaceutical.² Transnational organized crime networks are generating billions in annual revenue from Canadian territory. First Nations territories are being systematically utilized and exploited. Our investigative integrity and capacity require constant attention and evolving capability.

Bill C-12 provides essential tools. Implementation will require organizational adaptation, resource investment, and genuine partnership. The Ontario Provincial Police and the members of the Canadian Association of Chiefs of Police stand ready to proceed with professionalism, with ethical commitment to the communities we serve, and with clarity about the operational challenges ahead.

Thank you for your attention and for your commitment to public safety in Canada.

² Of all apparent opioid toxicity deaths so far in 2025 (Jan to Mar), 82% involved opioids that were non-pharmaceutical. Source: <https://health-infobase.canada.ca/substance-related-harms/opioids-stimulants/>