

November 21, 2025

Advisory Committee of Political Parties (ACPP) Secretariat
Elections Canada
30 Victoria Street
Gatineau, QC K1A 0M6

RE: 2025 ACPP Annual General Meeting Follow-Up Submission

Dear Members of the Advisory Committee,

On behalf of the People's Party of Canada, thank you for the opportunity to contribute to the 2025 Annual General Meeting of the Advisory Committee of Political Parties (ACPP). We value this forum as an essential venue for maintaining open dialogue between Elections Canada and registered parties, and we appreciate the professionalism with which Elections Canada approaches this work.

Over the past year, our candidates, official agents, and volunteers have shared a range of observations regarding the administration of the 45th General Election and their interactions with Elections Canada's compliance and support systems. In the spirit of constructive collaboration, we respectfully submit the following considerations.

1. Special Ballots and Public Confidence

We believe the most pressing issue carried into — and emerging from — this year's meeting is the growing gap between the *use* of special ballots and the *public's confidence* in them. Despite increased uptake, Canadians — especially younger voters — express uncertainty about the transparency, security, and chain-of-custody of mail-in processes. Much of this concern is shaped by external discourse, particularly from the United States, as well as limited public understanding of verification and handling safeguards.

A secure electoral system must not only *be* secure — it must *feel* secure.

We encourage Elections Canada to:

- continue strengthening verification, handling, and audit processes for special ballots;

- communicate these safeguards in clearer and more accessible terms;
- consider plain-language transparency summaries that explain ballot control and reconciliation; and
- continue providing Parliament with recommendations to modernize the special-ballot framework, including appropriate ID protections and clearer timelines.

We believe these steps would help rebuild confidence without limiting accessibility.

2. Bank Account Requirements & Inconsistent Banking Practices

We appreciate Elections Canada's acknowledgement that the mandatory bank-account requirement — even for candidates who do not intend to raise or spend funds — creates unnecessary administrative barriers. We also recognize that the Chief Electoral Officer has raised this issue with Parliament several times without legislative resolution.

The practical challenges highlighted during this year's ACPP meeting reinforce the urgency of action. Despite Elections Canada's engagement with the Canadian Bankers Association, financial institutions continue to apply requirements inconsistently, resulting in:

- requests for documents not required under the Canada Elections Act;
- contradictory instructions between branches of the same bank;
- delays that jeopardize candidates' ability to campaign effectively, raise funds, and incur expenses; and
- avoidable compliance risks across all political parties.

These obstacles fall heaviest on first-time candidates and smaller parties lacking full-time administrative support.

We encourage Elections Canada to:

- continue advocating for legislative changes to remove bank-account requirements for candidates with no planned financial activity;
- reinforce national guidance to ensure consistent banking practices; and
- expand public-facing guidance on the minimum legal requirements for account opening.

3. EFR Modernization, Transfers, and Reporting

We welcome Elections Canada's ongoing modernization of the Electronic Financial Return (EFR) system and appreciate the acknowledgement of website and performance issues during peak filing periods.

We recommend:

- extending EFR transfer and reporting functionality to Electoral District Associations (EDAs), which would help align administrative capacity across parties of all sizes;
- simplifying validation processes and expanding scenario-based guidance for volunteer agents;
- modernizing EC systems to allow for alternative methods of reporting from secure sources such as "clouds", drop boxes, and similar tools; and
- prioritizing system reliability upgrades to prevent outages during critical high-use and filing windows.

Furthermore, the continuing misalignment between the Canada Elections Act and the Income Tax Act — particularly regarding the definitions of "benefits" and "advantages" — creates recurring confusion and duplicated record-keeping. We encourage Elections Canada to continue highlighting this issue in future reports to Parliament.

4. Candidate Accessibility & Nomination Barriers

Candidate participation remains a cornerstone of Canada's democratic process. However, nomination requirements continue to present uneven challenges across the country.

Signature thresholds that are manageable in dense urban ridings become significantly more burdensome in geographically large or sparsely populated areas. Ensuring that Returning Officers apply nomination rules consistently and transparently is also essential for accessibility.

We encourage Elections Canada to continue strengthening Returning Officer training and to share its operational perspective with Parliament on how nomination requirements function in practice, particularly in rural and northern regions where logistical challenges are most acute.

5. Proportional, Risk-Based Compliance

We recognize Elections Canada's ongoing efforts to streamline compliance reviews and appreciate recent internal reforms. However, the compliance burden continues to fall unevenly between major parties with extensive administrative support and smaller parties reliant on volunteer agents.

We encourage Elections Canada to:

- refine its proportional, risk-based approach by focusing intensive audits on higher-risk filings;
- provide simplified pathways for low-transaction campaigns; and
- reinforce national consistency in the interpretation and application of compliance rules.

This balanced approach would uphold rigorous standards while ensuring fairness and predictability for all political participants.

The People's Party of Canada remains committed to a democratic process grounded in **Freedom, Responsibility, Fairness, and Respect**. We appreciate the constructive engagement of Elections Canada and the opportunity to contribute to the continued improvement of Canada's electoral system through the ACPP.

Sincerely,



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People's Party of Canada



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