

Bill C-25, the *Strong and Free Elections Act* - Implications for Survey Researchers

As you may be aware, Bill C-25, the *Strong and Free Elections Act*, recently received Royal Assent. The Act introduces a number of amendments to the *Canada Elections Act* aimed at strengthening the integrity of Canada's electoral system in response to evolving threats, such as deepfakes of electoral actors and other deceptive practices.

Broadly, Bill C-25 reinforces the importance of protecting the integrity of elections and maintaining public trust in electoral processes at a time when artificial intelligence and digital technologies are reshaping the information environment.

The Bill also introduces new provisions to close channels for foreign funding that survey researchers should be aware of. Most notably, third parties are now prohibited from using property, services, or funds from a foreign entity to conduct an election survey (Sections 349.012 and 349.02). In the same vein, third parties are prohibited from accepting crypto assets, money orders, or prepaid payment products for an election survey. There are also a few new financial reporting requirements for third parties conducting election surveys.

More information on the Act can be found here:

- www.parl.ca/DocumentViewer/en/45-1/bill/C-25/royal-assent
- www.canada.ca/en/democratic-institutions/news/2026/06/government-of-canada-strengthens-election-protections-following-royal-assent-of-bill-c-25-the-strong-and-free-elections-act.html

The newly amended *Canada Elections Act* defines “foreign entity” as follows (new text is bolded):

349.01 (1)

“*foreign entity* includes

(a) an individual who is not a Canadian citizen or a *permanent resident* as defined in subsection 2(1) of the [Immigration and Refugee Protection Act](#);

(b) a corporation or entity incorporated, formed or otherwise organized outside Canada if it does not carry on business in Canada or one of the primary activities that it carries on in Canada consists of doing anything to influence electors to vote or refrain from voting, or to vote or refrain from voting for a

particular candidate, potential candidate, registered party or eligible party, at an election;

(c) a trade union that does not hold bargaining rights for employees in Canada; **or**

(d) a *foreign economic entity*, a *foreign entity*, a *foreign power* or a *foreign state*, as those expressions are defined in subsection 2(1) of the *Foreign Interference and Security of Information Act*.