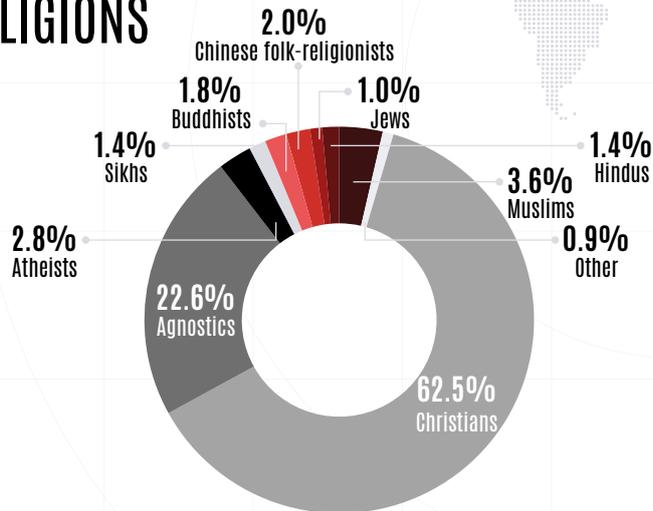




CANADA

RELIGIONS



LEGAL FRAMEWORK ON FREEDOM OF RELIGION AND ACTUAL APPLICATION

The constitution and laws of Canada guarantee freedom of conscience and religion, as well as thought, belief, opinion and expression,¹ subject to “reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society”.² Canadians have the right to “equal protection and equal benefit of the law without discrimination” based on religion.³

Federal and provincial laws prohibit discrimination on the grounds of religion, permit individuals to sue for violations of religious freedom, and provide remedies for complaints.⁴ Religious groups are not required to register with the government. However, to receive tax-exempt status they must register as non-profit organisations with the Canada Revenue Agency (CRA). Charitable status grants the clergy access to a number of federal benefits, such as tax deductions for resident clergy and faster immigration procedures.⁵

The Constitution Act, 1867 guaranteed the right of Protestant and Catholic minorities to publicly funded denominational schools (Section 93, 2-3). However, constitutional amendments repealed this guarantee in Quebec⁶ and

Newfoundland and Labrador⁷ and replaced them with a secular public education system.⁸ Constitutionally protected public funding for Catholic schools remains in place in Ontario, Alberta, and Saskatchewan. Federal law protects publicly funded Catholic and Protestant minority education in the Northwest Territories, Yukon, and Nunavut.⁹ Six of the 10 provinces provide at least partial funding to some faith-based schools.¹⁰ Home-schooling is legal across Canada and financial support is provided to parents in Saskatchewan, Alberta, and British Columbia.¹¹

In May 2018, the Supreme Court of Canada (SCC) rendered its decision in the case of *Highwood Congregation of Jehovah’s Witnesses (Judicial Committee) v. Wall* in which Mr. Randy Wall appealed the internal disciplinary actions of his Alberta Jehovah’s Witnesses congregation to “disfellowship” him and exclude him from the religious community. Mr. Wall claimed this had adversely impacted his business due to its large number of clients who were themselves Jehovah’s Witnesses. The SCC’s unanimous decision found that issues of internal ecclesiastical discipline were not justiciable by the court.¹²

In June 2018, the SCC delivered its landmark decisions in the related cases of *Trinity Western University, et al. v. Law Society of Upper Canada* and *Law Society of British*

Columbia v. Trinity Western University, et al. These cases related to the refusal of the law societies to accredit graduates from TWU's planned law school because of the university's Community Covenant which requires members of the Trinity Western University (TWU) community to "abstain from... sexual intimacy that violates the sacredness of marriage between a man and a woman".¹³ The law societies, as the licensing bodies for lawyers in British Columbia and Ontario, claimed that the covenant was discriminatory to the LGBT+ community. In its decisions in favour of the law societies and against TWU, the SCC found that they were acting reasonably, balancing rights, in denying accreditation to a proposed TWU law school: "Law Society of Upper Canada's decision means that TWU's community members cannot impose those religious beliefs on fellow law students, since they have an inequitable impact and can cause significant harm."¹⁴ The SCC recognised that this was a "profound interference" in the TWU community's religious freedom, but that given the "unequal access" caused by the covenant it was justifiable.¹⁵

In advance of a Federal Court challenge, a coalition of Muslim, Jewish and Christian leaders met with government officials in March 2018 to object to the Canada Summer Jobs funding application procedure which requires an organisation to "attest that both the job and the organization's core mandate respect individual human rights in Canada, including the values of the Canadian Charter of Rights and Freedoms as well as other rights."¹⁶ The issue that concerned the leaders in particular was having to endorse "other rights", which included "reproductive rights and the right to be free from discrimination on the basis of sex, religion, race, national or ethnic origin, colour, mental or physical disability, sexual orientation or gender identity or expression."¹⁷

In a statement in January 2018 the religious leaders wrote: "The promise of a free and democratic society is that there be no religious or ideological test or conditions to receiving government benefit or protection."¹⁸ In light of their protests against the original attestation, the Canadian government relented and dropped the requirement that applicants endorse "other rights;" however, it still refused to fund groups that "actively work to undermine or restrict a woman's access to sexual and reproductive health services."¹⁹ As a result, several groups saw their applications rejected eliciting further legal challenges that are still pending before the courts.²⁰

In May 2019, the Ontario Court of Appeal ruled against a

coalition of groups representing more than 4,700 Christian doctors and in favour of the College of Physicians and Surgeons of Ontario (CPSO) and its policy that they must refer patients to physicians willing to provide medical services they object to.²¹ The physicians' coalition argued that referrals for such procedures as abortion and doctor-assisted suicide made them complicit in the act and violated constitutional guarantees of freedom of conscience and religion.²² The physicians' coalition had appealed a lower court ruling in January 2018 which had ruled in favour of the CPSO requirement. In its decision the Ontario Court of Appeal stated that the CPSO rules "strike a reasonable balance between patients' interests and physicians' Charter-protected religious freedom. In short, they are reasonable limits prescribed by law that are demonstrably justified in a free and democratic society."²³

In late June 2019, Quebec passed An Act respecting the laicity of the State, a law that declares that Quebec is a secular state founded upon four core principles: "the separation of State and religions, the religious neutrality of the State, the equality of all citizens, and freedom of conscience and freedom of religion."²⁴ The Act establishes that "parliamentary, government and judicial institutions are bound to adhere to all these principles in pursuing their missions, and State laicity requires that all persons have the right to lay institutions and lay public services."²⁵

In order to achieve these principles and ensure the separation of religion and state in government institutions and public services, the Quebec law expressly prohibits the wearing of religious symbols, which are defined as "any object, including clothing, a symbol, jewellery, an adornment, an accessory or headwear, that (1) is worn in connection with a religious conviction or belief; or (2) is reasonably considered as referring to a religious affiliation."²⁶ The act also establishes that government personnel are not permitted to provide services with their faces covered, nor are people accessing those services permitted to do so with their faces covered; an exception is made for those who must cover their faces for health reasons.²⁷ These restrictions affect a broad cross-section of public sector workers, including: employees of government departments, municipal employees, teachers, judges and Crown attorneys, public transit workers, employees in government-subsidised day care and even those "private institutions under agreement, intermediary resources and family-type resources governed by the Act respecting health services and social services."²⁸ Furthermore, the

Act amends the Quebec Charter of Human Rights and Freedoms to recognise “State laicity” as a fundamental value in the preamble. Anyone who exercises rights under the Quebec Charter must take the secular nature of the state into account.²⁹

Entrenched in Quebec’s secularism law is Section 34, a provision that the Act shall have effect notwithstanding Sections 2-7 and Section 15 of the Constitution Act, 1982, which are the fundamental freedoms, democratic rights, legal rights, mobility rights, and equality rights recognised by the Canadian Charter of Rights and Freedoms.³⁰ The Government of Quebec thereby hopes that for the legally permitted period of five years the secularism law can operate contrary to these protected rights that are applicable to all Canadians.

Several court challenges have followed, including by the National Council of Canadian Muslims (NCCM) and the Canadian Civil Liberties Association (CCLA), which took up the cause of a University of Montreal student and prospective teacher, Ichrak Nourel Hak, a Muslim woman who wears a hijab. Both the NCCM and the CCLA argued before Quebec Superior Court for a stay of certain sections of the Act and questioned its constitutionality, arguing that the Act was 1) a criminal law statute, in effect, and so a federal matter 2) unduly vague and so violated the rule of law, and 3) went against certain fundamental principles that underpin Canadian democracy, including respect for minority rights.³¹ While acknowledging that the Act violated freedom of religion guaranteed under the Canadian Charter, the decision of Justice Michel Yergeau was to deny the appeal for a stay. He based his decision in part on the fact that “The National Assembly, by a majority of votes, concluded that including a prohibition on wearing religious symbols in the code of conduct for persons occupying the roles listed in Schedule II of the Act serves the common good...”.³² In August 2019, the NCCM and the CCLA were given leave to appeal the lower court decision to the Quebec Court of Appeal.³³ That appeal was rejected in December 2019 after which the parties sought to appeal the decision to the Supreme Court of Canada, which decided in April 2020 not to hear the appeal.³⁴ According to the Dean of McGill University’s Faculty of Law Robert Leckey, further legal challenges are sure to come.³⁵

INCIDENTS AND DEVELOPMENTS

According to the latest official data available, police re-

corded 1,798 hate crimes in 2018.³⁶ This represents a 13 per cent decrease from 2017, but a 27 per cent increase from 2016.³⁷ This included 341 crimes determined to be motivated by anti-Semitism, which represents a 54 per cent increase since 2016.³⁸

The B’nai B’rith Canada League for Human Rights received 2,207 reports of anti-Semitic incidents in 2019, which broke the record set the previous year for the fourth consecutive year.³⁹ With the largest Jewish communities in Canada, Ontario and Quebec saw anti-Semitic incidents rise by 62.8 per cent and 12.3 per cent respectively between 2018 and 2019, a worrying trend.⁴⁰

Such incidents include an assault in March 2019 against a Hasidic Jew in Montreal (Quebec) with the assailant stealing some of his religious accoutrements (tallit and tefillin).⁴¹ In July 2019, a Montreal taxi driver shouted anti-Semitic abuse at an Orthodox Jew and then assaulted him after he photographed the driver’s taxi permit.⁴²

In August 2019, two Orthodox Jewish youth in Toronto (Ontario) were attacked by another youth. One suffered injuries to the face from being punched while the other had his arm broken.⁴³ In October 2019, a Jewish student at York University in Toronto was spat on by an individual spouting anti-Semitic slurs.⁴⁴

Official hate crime figures recorded by police in 2018 included 116 anti-Muslim acts.⁴⁵ The National Council of Canadian Muslims (NCCM) reported 51 anti-Muslim incidents in 2019.⁴⁶ The list includes the refusal in October by the People’s Party of Canada to take action against one of its candidates in Halifax (Nova Scotia) after it became known that she had made anti-Muslim statements, including a 2017 tweet in which she stated that “Islam is pure evil. Islam has no place in Canadian society”. In other incidents, a 12-year-old girl was forced in August to remove her hijab by Air Canada employees after she had gone through security at Toronto’s Pearson International Airport; eggs were thrown in July at the mosque in Owen Sound (Ontario); a two-year-old boy was assaulted in Laval (Québec) in July; some Muslims were verbally abused in a public space; and a bomb threat was made against an Ottawa mosque in April.⁴⁷

Official hate crime figures recorded by police in 2018 included 35 crimes motivated by bias against Catholics.⁴⁸ Although this figure remains very low; in 2020, there were some high-profile attacks on Catholic churches and members of the clergy across Canada.

On 22nd March 2019, Fr. Claude Grou was attacked with a knife while celebrating Mass at St. Joseph's Oratory in Montreal; he suffered minor injuries. A 26-year-old man was charged with attempted murder in the attack.⁴⁹ On 30th August 2020, a statue of the Virgin Mary was discovered decapitated outside of Our Lady of Lebanon Maronite Catholic Church in Toronto.⁵⁰ On 8th September 2020, two thieves broke into St. Catherine of Alexandria Roman Catholic Cathedral in St. Catharines (Ontario) and stole the tabernacle. It was subsequently retrieved from a nearby canal having been broken into, desecrated, and the sacred hosts stolen.⁵¹

COVID-19

Beginning in mid-March 2020, the onset of the COVID-19 pandemic in Canada led to the implementation of a range of directives, guidelines, and public health directives at the federal, provincial, and municipal levels across Canada. As healthcare is primarily under provincial jurisdiction according to the Constitution Act, 1867,⁵² it was largely the responsibility of provincial ministries of health in concert with local public health authorities to determine what restrictions were to be implemented to curb the spread of the virus. In all jurisdictions this led to restrictions on public worship, including the closing of places of worship from mid-March to late May/mid-June across Canada. In many cases religious authorities pre-empted the imposition of restrictions on public worship by health authorities by voluntarily closing their buildings. On 13th March, Canada's largest Roman Catholic diocese, the Archdiocese of Toronto, announced an end to all public weekend Masses.⁵³ On 17th March, all public Masses were suspended.⁵⁴ On 23rd March, all 200 churches of the Archdiocese of Toronto were closed to the public.⁵⁵ Televised private Masses became the norm.

With the easing of restrictions on public gatherings in most jurisdictions by late May-early June 2020, many faith communities reopened their places of worship in keeping with local public health guidelines on worship. The requirements for reopening places of worship varied from province to province. For example, in Alberta in the first stage of reopening in May, attendance at religious services was limited to 50 persons or 1/3 of the building's capacity, whichever was less.⁵⁶ Various other requirements were made, including how to direct the flow of people in places of worship; a ban on people with symptoms; discouraging congregational singing; and, encouraging congregants to wear face masks.⁵⁷ By June, these restrictions

were relaxed with no limit on religious services attendance (except for weddings and funerals whose limit was 100 persons) as long as congregants maintained a physical distance of two metres.⁵⁸ Similar restrictions exist in Ontario where limits remain on attendance at religious services, i.e. 30 per cent of the building's capacity.⁵⁹

After easing restrictions on public worship in the spring, the Government of Quebec severely tightened restrictions on indoor public gatherings in September. This reduced the number of permissible worshippers at religious services to a maximum of 50 in most of the province and to 25 in regions where the pandemic is more acute such as in the Outaouais region, Greater Montreal, and Quebec City.⁶⁰ This brought sharp criticism from Quebec bishops. Archbishop Christian Lépine of Montreal asked that churches be treated in the same way as other indoor venues such as theatres and concert halls, which have occupancy limits of 250 people.⁶¹ Cardinal Gérald Lacroix, Archbishop of Quebec and Primate of Canada, also expressed frustration with the government on 26th July 2020 at the Shrine of Ste-Anne-de-Beaupré over the lack of equitable treatment of faith communities: "To this day," he said, "we still have to negotiate from week to week with the authorities; they try to impose restrictions on us that are beyond reason."⁶² Since then, the situation has improved in a significant way.

PROSPECTS FOR RELIGIOUS FREEDOM

New or increased governmental restrictions on religious freedom during the period under review may have a negative impact on both majority and minority religions over the next two years. There appears to be an increased risk of societal intolerance against not only minority religions, particularly in the Province of Quebec following the passage of the secularism law, but also against the Catholic Church in the media and public life. The growing number of anti-Semitic incidents is also a cause for serious concern, not to mention the situation of Muslims.

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