



The Committee for Justice in Canada  
**B'NAI BRITH CANADA**  
Le comité pour la justice au Canada

## **Submission to the Standing Committee on Finance for Pre-Budget Consultations in Advance of the 2024 Federal Budget August 1, 2023**

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### **INTRODUCTION**

B'nai Brith Canada (“B’nai Brith”) is Canada’s oldest grassroots Jewish community organization, dedicated to eradicating racism, antisemitism, and hatred in all its forms, championing the rights of the marginalized, while providing basic human needs for members of the Jewish and other communities.

B’nai Brith looks forward to working with the federal government to deliver and implement sound recommendations that will make a positive difference by helping Canadians to *remember* the past, *realize* their hopes and dreams, and *reassure* them that their tax dollars are not funding hate.

With these goals in mind, B’nai Brith is asking the Standing Committee on Finance (“the Committee”) to adopt the following recommendations in its forthcoming report for the annual pre-budget consultations process.

### **DEDICATE FUNDING TO PROVIDE PUBLIC ACCESS TO HOLOCAUST ARCHIVES**

Since 2009, Canada has been a member of the International Holocaust Remembrance Alliance (IHRA).<sup>1</sup>

The IHRA’s 2000 *Stockholm Declaration* commits the signatories, including Canada, to “take all necessary steps to facilitate the opening of archives in order to ensure that all documents bearing on the Holocaust are available to researchers.”<sup>2</sup> In 2017, IHRA’s Monitoring Access to Holocaust Collections Project recommended that governmental archival institutions “release Holocaust related records, irrespective of any personal identifying information or national security classifications.”

As of August 2023, Canada has *not* fulfilled its obligation as a member of IHRA. To do so, it needs to release historical documents pertaining to the Holocaust. As a member of the Canadian delegation to IHRA, B’nai Brith would like to see a fundamental shift by the Government of Canada towards this critical issue.

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<sup>1</sup> International Holocaust Remembrance Alliance (IHRA). Canada.  
<https://www.holocaustremembrance.com/member-countries/canada>

<sup>2</sup> IHRA. Guidelines for Identifying Relevant Documentation for Holocaust Research, Education and Remembrance.  
<https://www.holocaustremembrance.com/resources/reports/guidelines-archival-documentation>

With the goal of ensuring that Holocaust archives are open and accessible to the public, the President of the Treasury Board and the Minister of Justice and Attorney General of Canada have a unique opportunity to introduce amendments to the *Access to Information Act* (ATIA) that would mandate the disclosure of:

- **all records relating specifically to alleged Nazi war criminals in Canada and to any other Canadian citizen or resident who may have been complicit in carrying out the Holocaust and**
- **all other Holocaust-related records (as defined by IHRA) in the possession of the Government of Canada**

These amendments, which are found in two of B'nai Brith's written submissions to the Standing Committee on Access to Information, Privacy and Ethics (ETHI) for its recent study on Canada's Access to Information System,<sup>3</sup> *can and should* be made *prior* to the tabling of the 2024 federal budget. Examples of precedent are the European Union Recital 158 of its General Data Protection Regulation<sup>4</sup> and the *US Nazi War Crimes Disclosure Act* 1998.<sup>5</sup>

Once the ATIA is amended, the Government of Canada should direct its departments and agencies to identify and deliver to Library and Archives Canada (LAC) all Holocaust related records in their possession, and then require LAC to organize and place the records in a Holocaust specific digital archive that is readily accessible to the public.

With the goal of ensuring that LAC follows best practices, it can implement the following recommendations that were put forward by members of IHRA's Monitoring Access to Holocaust Collections Project at a meeting on June 12, 2023 in Dubrovnik, Croatia.

- That **digitization** be made a priority due to the vital role it plays in promoting access and preservation.
- That **standardization of metadata** should follow the FAIR principles (Findable, Accessible, Interoperable and Reusable)
- That **joining** professional networks and using existing tools such as those offered by the European Holocaust Research Infrastructure (EHRI)
- That archives **adopt and actively apply** the IHRA Guidelines for Identifying Relevant Documentation for Holocaust Research, Education and Remembrance<sup>6</sup> and mark Holocaust-related collections.
- That archives **translate** the general information regarding access to materials on their website into more languages, with English as a priority.
- That archives **translate** the finding aids for collections into other languages, with English as a priority.

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<sup>3</sup> B'nai Brith Canada. February 14, 2023. "Mandating Public Disclosure of Records Regarding Nazi War Criminals and Establishing a Public Archive of Canada's Holocaust Records." <https://www.ourcommons.ca/Content/Committee/441/ETHI/Brief/BR12251659/br-external/B'naiBrithCanada-e.pdf>, and B'nai Brith Canada. May 25, 2023. "Supplement Brief to Mandating Public Disclosure of Records Regarding Nazi War Criminals and Establishing a Public Archive of Canada's Holocaust Records." <https://www.ourcommons.ca/Content/Committee/441/ETHI/Brief/BR12457798/br-external/B'naiBrithCanada-2023-05-25-e.pdf>

<sup>4</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council, p. I. 119/29. April 27, 2016. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>

<sup>5</sup> *Nazi War Crimes Disclosure Act*. October 8, 1998. <https://www.archives.gov/about/laws/nazi-war-crimes.html>

<sup>6</sup> IHRA. [IHRA Guidelines for Identifying Holocaust Documentation | IHRA \(holocaustremembrance.com\)](https://www.ihra.org/ihra-guidelines-for-identifying-holocaust-documentation/)

Only through public access to Holocaust archives can we learn lessons from those archives. Learning lessons from the Holocaust is a legacy we can create for the victims, giving meaning to the senseless death of innocents. To learn those lessons, we need access to the archives.

## RECOMMENDATION 1:

**That the Government of Canada dedicate funding to create a publicly accessible digital archive of all records (government departments and agencies) relating to the Holocaust and then have Library Archives Canada (LAC) organize and release them as non-redacted copies readily open and accessible to the public.**

## ADDRESS AFFORDABLE HOUSING SUPPLY

Since 1979, B'nai Brith, an independent charitable organization, has been a premier provider of sustainable and affordable housing for Holocaust survivors, disabled persons, seniors, and residents with low to moderate income in a setting that is both friendly and culturally familiar.

B'nai Brith's unique approach to affordable housing combines market rent units with rent-geared-to-income (RGI) units so that the residents of our buildings do not know who is in which kind of unit. All of our units are maintained to the same high standards. The RGI units in our apartment buildings and their waiting lists are controlled by Toronto Housing.

B'nai Brith's three apartment buildings, which provide **over 300 subsidized homes for individuals and families in Toronto**,<sup>7</sup> help ensure that members of the community have **access to affordable and well-maintained housing**. However, like all affordable housing initiatives across the country, the demand far exceeds the supply of units, and there is a lengthy waiting list.

### ➤ *Revitalize and Improve Access to National Housing Strategy (NHS) programs*

With the goal of continuing to fulfill part of our mission (which is to provide basic human needs for members of our community),<sup>8</sup> B'nai Brith encourages the federal government to **revitalize and improve access to NHS programs to help create new permanent affordable rental units across the country for new Canadians, low-income families, youth, and seniors.**

Improved access to programs (such as the Seed Funding Program, National Housing Co-Investment Fund, Rental Construction Financing Initiative and Rapid Housing Initiative) **would increase charitable organizations' capacity to finance the construction of new affordable rental-housing projects and, in turn, create more RGI units across Canada for vulnerable Canadians.**

### ➤ *Create a Federally Supported Rental Property Acquisition Fund*

Our organization would like to take this opportunity to encourage this Committee to adopt a recommendation found in a B'nai Brith May 2023 submission to the Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities (HUMA) for its

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<sup>7</sup> B'nai Brith's three buildings: The Upper Canada Lodge Building (a seniors building), located at 4266 Bathurst Street; B'nai Brith Canada Building (a seniors building), located at 4300 Bathurst Street; and The Dan Family Residence (a multi-family building), located at 15 Torresdale Avenue.

<sup>8</sup> B'nai Brith's Mission: "We are dedicated to eradicating racism, antisemitism and hatred in all its forms, championing the rights of the marginalized, while providing basic human needs for members of our community."

<https://www.bnaibrith.ca/who-we-are/>

study on the financialization of housing.<sup>9</sup> B’nai Brith’s recommendation calls on the Government of Canada to create a federally supported rental property acquisition fund.

The submission states that: “Access to a new federally supported rental property acquisition fund would provide B’nai Brith, and other responsible charities with similar mandates, a unique opportunity to purchase affordable rental buildings and housing co-ops for sale in cities across the country. It would also protect the RGI units that B’nai Brith currently provides.”

## **RECOMMENDATION 2:**

**That the Government of Canada help more charitable organizations (such as B’nai Brith) cover the costs related to the construction of new affordable rental housing projects by revitalizing and improving access to National Housing Strategy (NHS) programs. For example, the Seed Funding Program, National Housing Co-Investment Fund, Rental Construction Financing Initiative and Rapid Housing Initiative.**

**That the Government of Canada create a federally supported rental-property acquisition fund.**

## **ACCOUNTABILITY FOR TAXPAYERS’ DOLLARS**

The federal government recently announced that it will provide up to \$100 million over four years to the United Nations Relief and Works Agency for Palestinian Refugees in the Near East (UNWRA) to “deliver core programs that support basic education, health, social services and livelihood opportunities and protect the rights of Palestinian refugees.”<sup>10</sup> B’nai Brith believes that while UNWRA could contribute to ensuring the fulfillment of the basic needs of Palestinian refugees, it often misses the mark.

According to UNWRA, students in its schools “... are taught the curriculum and textbooks of their host country, a practice agreed by UNESCO and the host countries in 1954.”<sup>11</sup>

It is our belief that UNWRA’s scheme of helping develop host countries’ curriculum is a worthwhile goal towards integrating Palestinians into the host nations’ respective societies. However, B’nai Brith continues to have serious concerns over the host curriculum that is being taught in UNWRA schools in the Palestinian Authority (PA)’s territories, which is directly supported by Canada’s contributions.

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<sup>9</sup> B’nai Brith Canada. May 25, 2023. Submission to the Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities for its Study on the Financialization of Housing. <https://www.ourcommons.ca/Content/Committee/441/HUMA/Brief/BR12457664/br-external/BNaiBrithCanada-e.pdf>

<sup>10</sup> Government of Canada. June 26, 2023. “Canada continues its support to Palestinian refugees.” <https://www.canada.ca/en/global-affairs/news/2023/06/canada-continues-its-support-of-palestinian-refugees.html>

<sup>11</sup> UNWRA. <https://www.unrwa.org/education-neutrality>

Below are some examples of extremist discriminatory language that are found in the current PA curriculum, and have been previously shared with the federal government by B'nai Brith Canada:

**Example 1:**<sup>12</sup>

يُطلق أحد المستوطنين النار على السيارات المارة في إحدى الطرق، إذا كان احتمال إصابته للسيارة في الطلقة الواحدة هو ٧,٠، أطلق المستوطن النار على ١٠ سيارات، ما توقعك لعدد السيارات التي أُصيبت؟

*A math question asks the possibility of a “settler” hitting passing cars with gunfire.*

**Example 2:**<sup>13</sup>

خطوات الحل:

- الفرق بين المكانين مدينتي حيفا ومدينة سبتة العربية المغربية = ٣٥ درجة + ٥ درجة = ٤٠ خط طول.
- تحويل خطوط الطول إلى زمن = ٤٠ درجة X ٤ دقائق = ١٦٠ دقيقة؛ أي أنّ الفارق الزمني بين مدينة حيفا في فلسطين، ومدينة سبتة المغربية ساعتان وأربعون دقيقة.

*A geography problem refers to Haifa as being in “Palestine.” Haifa is in Northern Israel.*

The above-noted examples are evidence of content developed by the PA as a component of its curriculum that is: 1) *inciting violence against Israelis* and 2) *promoting the erasure of Israel – the Jewish State.*

B'nai Brith believes that Israelis and Palestinians must be educating their youngest generations to prepare for future peaceful coexistence. Canada should **demand that all educational curriculums that receive funding from a UN program are developed in accordance and are reflective of the UNESCO standards. Canada must equally demand accountability for all of its international development funding in accordance with its own standards.** These standards are **clearly violated** by the PA's current curriculum.

Canadian funds are being demonstrably utilized to develop a curriculum for use within the PA's jurisdiction, which includes UNWRA schools, that is contrary to the objectives of UNWRA, the United Nations, and contrary to Canada's stated aims in the region as a result of the promotion of violence, antisemitism, and hatred.

**RECOMMENDATION 3:**

**That the Government of Canada create an oversight mechanism that enables the withholding of funds allocated to the Palestinian Authority (PA) for the purpose of developing a host nation curriculum as a component of its current UNWRA commitment.**

**That the Government of Canada undertake a forensic audit of its UNWRA contributions to determine the amount that is allocated to the creation of host nation curriculums, and conduct a thorough review of the curriculums to ensure that they are compliant with both**

<sup>12</sup> Taken from a Grade 11 Math Textbook, Literature and Religious Studies Stream, 2017/2018, page 55.

<sup>13</sup> Grade 11 Geography, 2017/2018, page 39.

**UNESCO and Canadians standards. Canada cannot continue funding educational materials that incite hate.**

**That the Government of Canada immediately freeze all funding allocated to the PA to develop its host nation curriculum until it is brought into compliance with Canadian and UNESCO standards.**