



5 November 2025

Filed online

Marc Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Secretary General,

Re: *Call for comments – Improving the public alerting system, [Telecom and Broadcasting Notice of Consultation CRTC 2025-180](#) (Gatineau, 15 July 2025) – Procedural request*

1. On 27 April 2023 the *Online Streaming Act* received Royal Assent. The new legislation added a new section to the *Broadcasting Act* which empowers the CRTC to set conditions for “the carriage of emergency messages” by broadcasters (subsection 9.1(1)(l)).
2. On 15 July 2025 the CRTC announced that “as part of its Consumer Protections Plan to help protect Canadians, the Commission is considering targeted improvements to support the NPAS within its mandate” and that it was therefore “seeking comments on certain aspects of the NPAS, including barriers to accessibility, the languages in which alerts are provided, issues affecting its availability nationwide, and possible measures the Commission could implement to monitor the system’s status more effectively” (*Summary*).
3. The Commission therefore issued Notice of Consultation 2025-180 stated that it was seeking comments in six areas with respect to broadcasting and telecommunications:
 - review the accessibility of the system for persons with disabilities;
 - facilitate the dissemination of alerts in both official languages;
 - explore expanding the system to include Indigenous and additional languages;
 - address potential wireless public alerting gaps across the country;
 - review the existing public alerting test schedule; and
 - determine improved methods by which the Commission can monitor and validate that LMDs are meeting their public alerting requirements.

4. The CRTC's notice of consultation asked 13 questions:

2025-180: CRTC questions

Distribution of alerts in both official languages

- 1 Q1. In light of the revised CLF guidelines on the dissemination of emergency alerts in both official languages, is it reasonable and appropriate for the Commission to take additional measures, within its regulatory authority in the Telecommunications Act and the Broadcasting Act, to require LMDs to relay alerts in both English and French, when they are issued as such?
- 2 (a) If so, what regulatory measures should the Commission consider under the Telecommunications Act and the Broadcasting Act? For instance, should the Commission consider imposing new conditions of service under the Telecommunications Act and imposing new conditions of service and amended conditions of exemption orders under the Broadcasting Act?

Availability of alerts in Indigenous and other languages

- Q2. Can and should the NPAS technically or operationally support the distribution of public alerts in languages other than English and French, including Indigenous languages? Specifically:
 - 3 (a) Have EMOs considered whether, and how, to distribute public alerts in languages other than English and French using the NPAS? If not, why not – what challenges were identified to doing so?
 - 4 (b) What is the feasibility, both technically and operationally, of the NPAS supporting additional languages? What technical barriers exist to supporting additional languages (e.g., language-specific character sets for alerting decoder devices, language-specific character sets for handsets, technical limitations of the NAAD System, Wireless Public Alerting [WPA] technical specifications, etc.)?
- Q3. What role can the Commission play in facilitating the distribution of alerts in languages other than English and French, including Indigenous languages? Should the Commission take additional regulatory measures to support the distribution of alerts in languages other than English and French, including Indigenous languages?

Accessibility of the NPAS

- 5 Q4. Are there barriers to the accessibility of public alerts for persons with disabilities in Canada? If so, how can the NPAS be improved and how can the Commission contribute to reducing or removing these barriers?

Technology gaps in wireless public alerting availability in Canada

- Q5. How can the Commission help improve the availability of public alerts? Specifically:
 - 6 (a) Where are the current gaps in accessing WPA in rural, remote, and Indigenous communities in Canada and how can such gaps be efficiently tracked?
 - 7 (b) What is the feasibility, technically or otherwise, of creating and operating a national mobile application available for download across Canada, as a possible solution for reducing gaps in WPA?
 - 8 (c) Should WSPs be required to provide alerting over 3G networks? What technical or economic challenges exist to doing so?
 - 9 (d) How can the Commission improve the current reach of WPA to rural,

2025-180: CRTC questions

remote, and Indigenous communities in Canada through regulatory measures? What other means should the Commission consider to support the distribution of public alerts to Canadians that are not currently served by WPA?

Schedule for visible public test alerts

- Q6. Is the Commission's existing visible public alert testing framework, including the timing and frequency of visible test alerts, appropriate? Specifically:
- 10 (a) Is the biannual visible public alert test schedule still appropriate and in the public interest? Provide supporting rationale for why or why not and, if not, what changes are needed.
- 11 (b) Do EMOs, LMDs, and the NAAD System operator require further flexibility with regards to the timing and frequency of visible NPAS testing? If so, what new or modified regulatory measures are appropriate to enable that flexibility?

Actively monitoring the status of the NPAS

- Q7. What are technical, regulatory, or other solutions that the Commission could implement to ensure that LMDs are connected to the NPAS and distribute alerts to the public? Specifically:
- 12 (a) What technical or other solutions could the Commission, the NAAD System, or the telecommunications and broadcasting industries implement to automatically detect and validate LMD connection to the NPAS?
- 13 (b) What tools (including regulatory measures) should the Commission use to streamline the verification and monitoring of LMDs' NPAS requirements? For instance, what kinds of standardized forms or evidence should LMDs provide to the Commission to demonstrate that they have established and are maintaining a connection with the NAAD System and disseminating alerts to the public in accordance with any applicable requirements?

5. As of today's date, the CRTC has not itself placed any evidence regarding Canada's public-alerting system on the public record. It has not, for example, published any of the results it may have regarding its existing visible public-alert testing framework (questions Q6, Q6(a), Q6(b)) or of its verification and monitoring work (Q7, Q7(a) and Q7(b)), even though such information is relevant to the "Schedule for visible public test alerts" and "Actively monitoring the status of the NPAS" questions.
6. While the CRTC appears to suggest, moreover, that the 'availability of public alerts' can be improved (see Q5) – especially for "rural, remote, and Indigenous communities in Canada" (see Q5(a)) – it has not published any information about issues related to the availability of public alerts or about other "Technology gaps in wireless public alerting availability" (Q5(b), Q5(c) and Q5(d)).
7. In fact, the only evidence that the CRTC made available on the 2025-180 public record is the June 2024 Neal Squire Society [Study on Canadian Emergency Alert Accessibility](#) which was funded by Accessibility Standards Canada and focusses on whether the emergency alerting system "worked well for people with disabilities" (p. 2). (The Society had 505 people complete an online survey: according to these respondents, the information

provided in radio, television and wireless alerts was unclear, the TV alerts were too loud and the wireless alerts were very startling and sometimes frightening.)

8. On 14 October 2025 the CRTC changed the deadlines for the 2025-180 proceeding as shown below, so as to obtain “a more robust public record for the proceeding”:

	2025-180 (Gatineau, 15 July 2025)	2025-180-1 (Gatineau, 14 October 2025)
Comments	14 October 2025	21 November 2025
Replies	13 November 2025	19 December 2025
Final written submissions	3 December 2025	28 January 2025

9. The federal government then presented its budget to Parliament yesterday (4 November 2025), and has proposed changes to the work of the Department of Public Safety and Emergency Preparedness. Extracts from the Budget related to PSEP are attached (Appendix 1). The government states that,

[t]o strengthen its mandate to keep Canadians safe from a range of risks, including natural disasters, crime and terrorism, ... Public Safety and Emergency Preparedness (PSEP) will work to become a leaner, more efficient department to better serve Canadians. This will be done by ... consolidating internal functions to ... improve service delivery PSEP will also leverage technology and AI to automate tasks.... PSEP will also refocus on core aspects of federal emergency management responsibilities. Emergency management functions and programs at PSEP have evolved in response to growing risks and demands. However, this evolution has often been fragmented—units have adapted independently while others have remained unchanged despite shifting priorities. At the same time, emerging priorities—such as national readiness and response capacity—require sustained attention and dedicated resources. **Modernising the organisational structure will address inefficiencies and create space to strategically advance critical and emergencies priorities.**
[bold font added]

10. Twelve working days remain to the CRTC’s 21 November 2025 deadline for interventions in the 2025-180 proceeding.
11. The Forum is asking that the Commission consider changing the focus of and deadlines currently established for the 2025-180 proceeding to take the government’s 4 November 2025 statements into account.

A. 2025-180 proceeding focussed on review, not rethinking

12. In 2018 the Commission stated that it was not “equipped or appropriately empowered to address” “a number of broader, multi-jurisdictional issues” regarding the management and operation of Canada’s emergency alerting system.¹
13. Indeed, the six areas that 2025-180 identifies as the CRTC’s areas of interest appear to be focussed on *reviewing* the existing emergency alerting system rather than on *redesigning* it. The Commission
- explains that it wants to review the system’s existing test schedule and accessibility (with respect to persons with disabilities), and
 - implies it wants to review
 - the availability of alerts in both official languages (“facilitate the dissemination of alerts in both official languages”) and
 - the availability of wireless alerts (“address potential wireless public alerting gaps across the country”).
14. The only two changes envisaged regarding Canada’s national public alerting system with respect to broadcasting and telecommunications are to consider including languages other than English and/or French in alerts, and to improve how the CRTC is able to “monitor and validate that LMDs are meeting their public alerting requirements”.
15. Meanwhile and as mentioned in paragraph 1, above, Parliament has now expressly modified the *Broadcasting Act* to provide the CRTC with explicit authority to regulate the broadcast of emergency alerts.
16. In the Forum’s view, the government’s 4 November 2025 statements require more than a review of the CRTC’s existing approach to emergency alerting in broadcasting and telecommunications. They require a rethinking of how alerts about emergent situations are to reach Canadians in the 21st century and therefore should include consideration of new approaches to the governance and transparency of the broadcasting and telecom components of a 21st century emergency alerting system. More briefly – the federal government’s changes do not envisage a somewhat updated version of the national alerting system – but a system that is redesigned for today’s reality and Canada’s changed circumstances and needs.

B. 2025-180 public record devoid of objective information from CRTC

17. FRPC’s overarching concern is that by inviting questions focussed on a review, rather than a redesign, of the broadcasting and telecom components of the national public alerting

¹ [The Weather Network/MétéoMédia – Licence renewal and renewal of mandatory distribution order, Broadcasting Decision CRTC 2018-342](#) (Ottawa, 31 August 21018), at paragraph 99:

... as federal, provincial and territorial Emergency Management Organizations continue to use the NPAS and have become more familiar with it, a number of broader, multi-jurisdictional policy issues have arisen, which neither the Governance Council nor the Commission are equipped or appropriately empowered to address.

system, the 2025-180 notice effectively forecloses discussion of new and innovative approaches to ensuring that Canadians, regardless of where they are in Canada, can be and are alerted to emergent situations.

18. By devising this consultation as a ‘paper-only’ proceeding, moreover, the Commission has limited its ability to interact directly with members of the public, emergency management officials and representatives from all fourteen jurisdictions in Canada.² A public hearing, on the other hand, would provide the Commission not just with a more complete public record (through exchanges between the hearing panel and appearing participants) but also with the near-immediate reply of appearing interveners to comments made by those appearing before them and to the panel’s questions. A public hearing would “help ensure that more distinct perspectives and lived experiences are considered” in this especially important area of “the Commission’s work.”³
19. FRPC also notes that the silence in 2025-180 regarding issues of accountability, transparency and the CRTC’s own findings regarding its ‘active monitoring of the national public alerting system’ risks an unhelpful narrowing of focus regarding an issue that today, perhaps more than in the past several decades, is of current and vital concern to all Canadians and all levels of government.
20. The Forum considers that redesigning Canada’s public-alerting system for broadcasting and telecom requires that the CRTC begin by providing Canadians with objective data describing the alerting system’s existing strengths as well as its weaknesses. It requires evidence about Canadians’ existing needs and future requirements for the national alerting system. Rethinking the system will also require a modern organizational structure and the establishment of 21st century standards for accountability and transparency. The CRTC should therefore amend its notice of consultation to notify interested parties of its intention to add new evidence to the record, and to hear from Canadians and Canadian organizations in person through a public hearing.

C. Proposal regarding 2025-180

21. Of the different entities involved with Canada’s public-alerting system, the CRTC is uniquely empowered to hold and is uniquely experienced in holding and advertising public hearings regarding major national communications policies.
22. Section 3 of the CRTC’s 2010 *Rules of Practice and Procedure* permits the CRTC to bring matters before the Commission on its own initiative⁴ and the CRTC apparently decided to bring its review of its 11-year-old emergency alerting system to its attention in mid-2025.

² Being the ten provincial, three territorial and the federal governments.

³ *Call for comments – A new approach to funding public interest participation in Commission proceedings, Broadcasting and Telecom Notice of Consultation CRTC 2025-94*, (Gatineau 12 May 2025), “Summary”.

⁴ *Rules of Practice and Procedure*, s. 3: “A matter may be brought before the Commission by an application or complaint or on the Commission’s own initiative.”

23. The same *Rules of Practice and Procedure* also permit the CRTC to amend the 2025-180 notice of consultation. The CRTC may “adjourn a proceeding” when it believes “that the circumstances or considerations of fairness permit”: section 10(a). It may “require a party ... to provide information ... that it considers necessary to enable the Commission to reach a full and satisfactory understanding of the subject matter of the proceeding”: section 28(1)(a). The CRTC may also “dispense with or vary” the application of its *Rules* when “considerations of public interest ... permit”: section 7.
24. FRPC asks that the Commission
- add to the 2025-180 public record by setting out all studies, research or information that it has or that it has undertaken since it last reviewed the public alerting system in August 2014 ([Broadcasting Regulatory Policy CRTC 2014-444](#)), no later than 19 December 2025;
 - add a public hearing to the 2025-180 process – for the last week of January 2026 – to enable Canadians to set out their concerns about Canada’s current public-alerting system and to express their needs for a 21st century alerting system to the CRTC hearing panel, and to permit emergency-management officials and others to answer the hearing panel’s questions;
 - consider inviting participants to a preparatory conference before the hearing, to determine procedures and “any other matters that might aid in the simplification of the evidence” on the record: *Rules*, subsections 37(c), (d) and (f) – and if the CRTC schedules such a preparatory conference, asks that the Forum be invited to participate; and to
 - extend the current deadlines to provide the public with the time needed to review the supplementary evidence made available by the CRTC, as follows:

	Current 2025-180 deadlines	Proposed 2025-180 deadlines
Interventions	21 November 2025	9 January 2026
Replies	19 December 2025	23 January 2026

S. 18(3) of the *Broadcasting Act* also empowers the CRTC to hold a public hearing on any matter within the *Act*’s jurisdiction: “The Commission may hold a public hearing, make a report, issue any decision and give any approval in connection with any complaint or representation made to the Commission or in connection with any other matter within its jurisdiction under this Act if it is satisfied that it would be in the public interest to do so.” S. 14(2) of the *Broadcasting Act* also empowers the Minister of Canadian Identity and Culture to “review and consider any technical matter relating to broadcasting referred to the Commission by the Minister and shall make recommendations to the Minister with respect thereto.”

S. 14 of the *Telecommunications Act* as well empowers Cabinet to require the CRTC to report on any matter within its jurisdiction: “The Governor in Council may require the Commission to make a report on any matter within the Commission’s jurisdiction under this Act or any special Act.” Section 52(3) of the *Telecommunications Act* also empowers to the CRTC to hear questions of fact under the *Telecommunications Act*: “The power of the Commission to hear and determine a question of fact is not affected by proceedings pending before any court in which the question is in issue.”



	Current 2025-180 deadlines	Proposed 2025-180 deadlines
Final submissions	28 January 2026	17 February 2026

Thank you for your consideration of this request.

Monica Auer, M.A., LL.M. execdir@frpc.net
Executive Director
Forum for Research and Policy in Communications (FRPC)

Attachment: Appendix 1 (highlighting added)

cc.

The Honourable Gary Ananasangaree, Minister of Public Safety (gary.anand@parl.gc.ca)
The Honourable Mélanie Joly, Minister of Innovation, Science and Economic Development
(melanie.joly@ised-isde.gc.ca)
The Honourable Steven Guilbeault, Minister of Canadian Identity and Culture
(steven.guilbeault@parl.gc.ca)
Leila Wright, CRTC (Leila.Wright@crtc.gc.ca)
Scott Shortliffe, CRTC (scott.shortliffe@crtc.gc.ca)
Scott Hutton, CRTC (scott.hutton@crtc.gc.ca)



Appendix 1



Government
of Canada

Gouvernement
du Canada



CANADA STRONG BUDGET 2025



November 2025 | budget.canada.ca

Canada

CANADA
STRONG
BUDGET 2025

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Cette publication est aussi disponible en français.

ISSN 1719-7740

Cat No.: F1-23/3E-PDF

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Photo Credit

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Cover Photo

Introduction - Title Photo

Canada Border Services Agency

Introduction - Page 26 photo

Chapter 4 - Title page photo

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As the world grows more volatile and dangerous, now more than ever, Canada must be ready and able to defend our territory, our people, and our values to secure our sovereignty and to protect and uphold our commitments to our Allies. This includes helping to counter Russian aggression and to uphold Ukraine's sovereignty and territorial integrity to ensure security across the Euro-Atlantic region.

In this period of great power competition and geopolitical uncertainty, Canadian leadership in the world will be defined not just by the strength of our values, but also by the value of our strength. A more confident, united, and stronger Canada can help transform this age of disorder into an era of prosperity for all Canadians.

This starts with rebuilding, rearming, and reinvesting in the Canadian Armed Forces. The government's generational investments in our Canadian Armed Forces will provide our military with the necessary tools and equipment to protect our sovereignty and bolster our security. This increase in investment also creates opportunities for the Canadian defence industry. We will reform defence procurement to make it easier and faster to buy Canadian-made equipment—supporting our domestic defence industry and creating high-paying careers.

The Canadian Armed Forces are currently active in 37 operations around the world. The women and men of our military contribute to promoting global peace and security, while ensuring Canada's place in the world. Canadian military operations range from maintaining international security and stability in the Middle East (Operation AMARNA), to leading a Multinational Brigade as part of NATO's assurance and deterrence measures in Central and Eastern Europe and the Baltics (Operation REASSURANCE), to whole-of-government sovereignty patrols and security exercises in Canada's Arctic (Operation NANOOK).

To address years of inadequate equipment for the Canadian Armed Forces and to strengthen Canada's defence industry, Canada's new government is accelerating investments to meet the North Atlantic Treaty Organization's (NATO) 2 per cent of gross domestic product (GDP) target this year and put Canada on a pathway to meet the NATO Defence Investment Pledge of investing 5 per cent of GDP in defence by 2035.

As part of this pledge, Canada will invest 3.5 per cent of GDP by 2035 in core military needs such as supporting the Canadian Armed Forces, modernising our military equipment and technology, and building up our defence industries. An

additional 1.5 per cent of GDP will also be dedicated to defence and security-related investments made by all levels of Canadian government, such as telecommunications and emergency preparedness systems which serve national defence and national security purposes. The government expects that currently planned spending by federal, provincial, territorial, and municipal governments will meet this 1.5 per cent commitment.

Through these investments, we are giving our Canadian Armed Forces the tools they need to defend every square foot of our sovereign territory, from the seafloor to the Arctic to cities to cyberspace, and to protect Canadians from present and emerging threats.

To protect our communities, Canada's new government is also cracking down on illegal drugs and gun trafficking, hiring 1,000 new Royal Canadian Mounted Police (RCMP) personnel and 1,000 new Canada Border Services Agency (CBSA) officers, and making bail and sentencing laws stricter. In September, the government introduced new legislation to address the horrifying rise in hate, especially in Antisemitism and Islamophobia, and to protect religious and cultural buildings and spaces. Our government is fighting hate so that together, we can build a country where Canadians of all faiths can live their lives openly, freely, and safely. This is Canada, and in Canada, you should be able to wake up, get in your car, drive to work, or your place of worship, come home, and sleep soundly at night. Canada's government is committed to making that promise a reality.

4.1 Defending Our Sovereignty

Canada must be prepared to defend our people, to secure our sovereignty, and to protect our Allies. Budget 2025 lays out the government's plan to secure Canada, fulfill our responsibility to shared security with our Allies, build a world-class defence industrial base, and establish a new **Defence Investment Agency** that will accelerate the procurement process.

Rebuilding, Rearming, and Reinvesting in the Canadian Armed Forces

Canadians are proud of our Armed Forces and their unwavering dedication to protect us and our sovereignty. They keep people and communities safe through major disasters. They protect our sovereignty and respond to threats in our Arctic. They contribute to NATO's deterrence and collective security efforts

Public Safety

Department of Public Safety and Emergency Preparedness

To strengthen its mandate to keep Canadians safe from a range of risks, including natural disasters, crime and terrorism, while meeting up to 15 per cent in savings targets over three years, Public Safety and Emergency Preparedness (PSEP) will work to become a leaner, more efficient department to better serve Canadians. This will be done by rightsizing leadership by reducing executive and administrative roles to flatten organizational structures and enhance productivity, consolidating internal functions to eliminate duplication and improve service delivery and discontinuing services with minimal operational impact, such as the Centre for Resilience and Continuity Management and the Public Safety Library. PSEP will also leverage technology and AI to automate tasks, and reduce software licensing requirements to achieve savings.

PSEP will also refocus on core aspects of federal emergency management responsibilities. Emergency management functions and programs at PSEP have evolved in response to growing risks and demands. However, this evolution has often been fragmented—units have adapted independently while others have remained unchanged despite shifting priorities. At the same time, emerging priorities—such as national readiness and response capacity—require sustained attention and dedicated resources. Modernising the organisational structure will address inefficiencies and create space to strategically advance critical and emergencies priorities.

Canada Border Services Agency

Recognizing its essential mandate to protect our sovereignty and secure our border and keep communities safe, the Canada Border Services Agency (CBSA) was provided with a reduction target of 2 per cent of its review base. Proposed savings will not impact border security, revenue collection or commercial facilitation operations.

millions of dollars

	2026- 2027	2027- 2028	2028- 2029	2029- 2030	Ongoing
Public Safety and Emergency Preparedness					
Modernising Government Operations	15.3	20.4	30.6	30.6	30.6
Sub-Total	15.3	20.4	30.6	30.6	30.6
Canada Border Services Agency					
Modernising Government Operations	52.0	52.0	52.0	52.0	52.0
Sub-Total	52.0	52.0	52.0	52.0	52.0
Correctional Service of Canada					
Modernising Government Operations	75.6	104.9	132.2	132.2	132.2
Sub-Total	75.6	104.9	132.2	132.2	132.2
Royal Canadian Mounted Police					
Modernising Government Operations	1,599.9	1,525.3	1,521.6	1,432.9	713.3
Sub-Total	1,599.9	1,525.3	1,521.6	1,432.9	713.3
Canadian Security Intelligence Service	14.4	14.4	14.4	14.4	14.4
Office of the Correctional Investigator of Canada	0.5	0.7	1.1	1.1	1.1
Parole Board of Canada	4.4	5.8	8.5	8.5	8.5
Total	1,762.2	1,723.6	1,760.5	1,671.7	952.2

Note: Organisations in this portfolio that are not listed in this table are not part of the planned reductions in Budget 2025.

Financial impact of RCMP reductions on a cash basis

millions of dollars, cash basis

	2026- 2027	2027- 2028	2028- 2029	2029- 2030	Ongoing
Royal Canadian Mounted Police					
Modernising Government Operations	39.2	42.9	50.8	60.1	697.3
Total	39.2	42.9	50.8	60.1	697.3