



**Written Submission for the Pre-Budget Consultations in Advance of the
Upcoming Federal Budget**

By: International Justice Mission Canada

Summary of Recommendations

- 1.** That Canada increase official development assistance to 0.7% of its gross national income (GNI) in alignment with United Nations commitments.
- 2.** That Canada launch a five-year commitment at the G7 to address online sexual exploitation and forced scamming.
- 3.** That Canada increase law enforcement resources in the Philippines to address the online sexual exploitation of Filipino children by Canadian offenders.
- 4.** That the Canadian Ombudsperson for Responsible Enterprise receive increased funding of \$7M for fiscal year 2025-2026.
- 5.** That the Government amends Bill C-63, *Online Harms Act*, to include private platforms.

About International Justice Mission Canada

International Justice Mission Canada (IJM Canada) is part of IJM's global network of offices and has been a registered charity in Canada since 2003.¹ Its mandate is to raise income and influence in Canada to contribute to the protection of 500 million people from violence by 2030.

IJM works to protect those living in poverty from various forms of violence and exploitation, including violence against women and children, forced and child labour, police abuse of power and the online sexual exploitation of children. IJM employs or partners with attorneys, investigators, social workers, and community activists in nearly 20 communities throughout Africa, Latin America, and Asia. Through these relationships, IJM rescues victims of violence, brings criminals to justice, restores survivors and strengthens justice systems.

IJM Canada is headquartered in Mississauga, Ontario, lands that have been inhabited since time immemorial by the Mississaugas of the Credit First Nation, the Haudenosaunee Confederacy, the Huron-Wendat, the Wyandot Nations, and their ancestors. As of the fiscal year end, March 31, 2024, the organization employed 19 full-time employees and raised \$8.3M in contributions received from 8,740 Canadian donors, including 3,420 monthly donors.²

Recommendation 1: That Canada increase official development assistance to 0.7% of its gross national income (GNI) in alignment with United Nations commitments.

Canada has never met the 0.7% target for official development assistance (ODA). Among G7 peers, Canada consistently ranks fourth or fifth.³ In the context of a poly-crisis of climate change, conflict, and increased economic disparity, Canada must increase official development assistance (ODA) in the 2024-2025 fiscal year. For Canada's ODA to provide sustainable results, more funds must be allocated towards projects and partnerships to strengthen justice systems and law enforcement capacity, improving access to justice for women and children globally.

Increasing evidence points to the importance of accountable and effective justice institutions to create an enabling environment for a range of development outcomes – from improved basic service delivery to increased private sector investment and reduced corruption.⁴ The absence of justice and the rule of law both creates poverty and impedes

¹ Registration number: 863889283 RR 0001, www.ijm.ca.

² Based on the Government of Canada's fiscal year, i.e. April 01, 2023, to March 31st, 2024.

³ Cooperation Canada, *2023 Canadian Aid Trends, 2023*, Cooperation Canada, <https://cooperation.ca/wp-content/uploads/2023/10/2023-Canadian-Aid-Trends-EN-Full-2.pdf>.

⁴ World Bank, "Justice and Rule of Law", April 28, 2015, *World Bank*, <https://www.worldbank.org/en/topic/governance/brief/justice-and-rule-of-law>.

poverty reduction and greater equality, making capacity building programs in countries with high rates of exploitation and violence essential to sustainable development.⁵

Additionally, the need for survivor-led, trauma-informed, gender-sensitive care to those who have experienced violence has never been higher. Central American women and girls suffer some of the highest rates of sexual assault and gender-based violence (GBV) in the world; a staggering 95% of these crimes go unpunished.⁶ More than half of Colombians do not turn to the justice system when in need.⁷ In Peru, 54.9% of women between 15 and 49 years old have experienced violence in their lifetime.⁸ Impunity for perpetrators of GBV is rampant, reaching over 90% in Bolivia.⁹

IJM recommends that the Canadian government partner with experienced NGOs that work with local authorities and survivors to make communities safer including providing technical assistance mentorship and training to police, prosecutors, courts and social service agencies.

Recommendation 2: That Canada launch a five-year commitment at the G7 to address online sexual exploitation and forced scamming.

At the G8 in 2010, the Harper government pledged \$2.85B over five years for maternal and child health. A hidden crisis experienced by millions of women and children globally was suddenly brought into focus by Canada's public commitment. By 2015, Canada had exceeded its five-year commitment, spending \$27M dollars above their initial commitment to a total of \$3.12B.¹⁰ It is time for a new G7 similar commitment to address the hidden crisis of online exploitation.

Children in Canada and around the world are being exploited online, a crime that has increased exponentially since the pandemic. 20% of children in some countries were subjected to child sexual exploitation and online abuse, including sextortion, in the past year.¹¹ 1 in 8 children globally have experience non-consensual taking, sharing and/or exposure to sexual images and videos in the last 12 months.¹² In Canada, the rate of

⁵ Ibid.

⁶ Natalie Gonnella-Platts and Jenny Villatoro, "Safety for Women is Key to Central America's Stability," October 31, 2022, George W. Bush Presidential Center, <https://www.bushcenter.org/publications/safety-for-women-is-key-to-central-americas-stability>.

⁷ World Justice Project, "The Rule of Law in Colombia: Key Findings from the General Population Poll 2022," 2023, *World Justice Project*, [https://worldjusticeproject.org/our-work/research-and-data/rule-of-law/colombia-2022#:~:text=More%20than%20half%20\(58%25\),for%20not%20reporting%20\(40%25\)](https://worldjusticeproject.org/our-work/research-and-data/rule-of-law/colombia-2022#:~:text=More%20than%20half%20(58%25),for%20not%20reporting%20(40%25)).

⁸ Instituto Nacional de estadística e Informática, *Encuesta Demográfica y de Salud Familiar 2021*, page 267, https://www.inei.gob.pe/media/MenuRecursivo/publicaciones_digitales/Est/Lib1838/pdf/cap011.pdf.

⁹ Baseline research by International Justice Mission Bolivia, 2023.

¹⁰ Aniket Bhushan, "Exceeding Commitments: Muskoka and MNCH," June 18, 2025, *Canadian International Development Platform*, <https://cidpnsi.ca/exceeding-commitments-muskoka-and-mnch/>.

¹¹ End Violence Against Children, "Disrupting Harm," 2019, <https://www.end-violence.org/disrupting-harm>.

¹² Stevenson, J., Vermeulen, I. and Fry, D, Indicator 3: Global Nature of Online Child Sexual Abuse Material (CSAM), Data from 'Into the Light: Childlight's Global Child Sexual Exploitation and Abuse Index', *Childlight*, 2024, <https://childlight.org/sites/default/files/2024-05/into-the-light.pdf>.

online “child pornography” increased 290% between 2014 and 2022.¹³ In 2023, the National Center for Missing and Exploited Children fielded 36.2 million reports of child sexual abuse material (CSAM), a 115% increase since 2019.¹⁴

Online crimes are not limited to sexual exploitation, Canadians lost more than \$161M to investment scams over the first six months of this year, most of which involved cryptocurrency, according to the Canadian Anti-Fraud Centre.¹⁵

Our justice systems and social services are not equipped to handle the scale and scope of these crimes common in our digital age. Law enforcement must adapt to new forms of collaboration within Canada and internationally, using new investigative tools and practices – including ethical AI. Public prosecutors must be educated on the depth of harm and violence experienced by victims behind the screens to provide appropriate sentences and restitution. Technology and financial companies must be held to new standards for detecting, reporting and preventing these crimes on their platforms.

Online sexual exploitation of children, sextortion and forced scamming are global crimes that require an integrated solution. Canada is home to the victims and perpetrators of online sexual exploitation and is also the recipient and facilitator of scams. Investing in personnel, research, technology, training and tools to stop online exploitation will position Canada as a leader in this digital age. We urge the Canadian government to send a strong message to other G7 Members through robust commitments and investments in these issues.

Recommendation 3: That Canada increase law enforcement resources in the Philippines to address the online sexual exploitation of Filipino children by Canadian offenders.

According to the Philippine Anti Money Laundering Council, since 2015 Canada has consistently ranked fourth following the U.S., U.K. and Australia in international payments sent to the Philippines that were flagged for online sexual exploitation of children.¹⁶ Even though Canada is ranked fourth, offenders in Canada are producing and consuming this abuse at the same rate as other nations.

Canada is a member of the Philippines Internet Crimes Against Children Center, yet with only one permanent RCMP staff member based in Manila. Other countries have up

¹³ Laura Savage, “Online child sexual exploitation: A statistical profile of police-reported incidents in Canada, 2014 to 2022,” March 12, 2024, *Statistics Canada*, <https://www150.statcan.gc.ca/n1/pub/85-002-x/2024001/article/00003-eng.htm>.

¹⁴ National Center for Missing & Exploited Children, “CyberTipline 2023 Report,” 2023, <https://www.missingkids.org/cybertiplinedata>.

¹⁵ Bill Fortier, “It seemed like fast easy money. By the time he realized it was a scam, it was too late,” October 19, 2023, *CTV National News*, <https://www.ctvnews.ca/business/more-than-161m-lost-to-investment-scams-over-the-first-6-months-of-2023-canadian-anti-fraud-centre-1.6607759>.

¹⁶ Anti-Money Laundering Council, “Online Sexual Abuse and Exploitation of Children in the Philippines,” 2023, page 21, <http://www.amlc.gov.ph/images/PDFs/Main/Online%20Sexual%20Abuse%20and%20Exploitation%20of%20Children%20in%20the%20Philippines.pdf>.

to five permanent staff who collaborate with international and Philippine law enforcement to investigate and triage OSEC cases that have a nexus between their home country and the Philippines. As Canada is the fourth largest contributor to the crime, we recommend that Canada increase resourcing to become the fourth largest foreign law enforcement partner in the Philippines.

Recommendation 4: That the Canadian Ombudsperson for Responsible Enterprise (CORE) receive increased funding of \$7M for fiscal year 2025-2026.

IJM celebrated the passing of the *Modern Slavery Act* in May 2023 and has been monitoring its implementation. As of July 30, over 5,700 entities and government institutions submitted their reports to Public Safety Canada under the new transparency requirements. IJM recommends increasing funding from \$5M to \$7M so that the CORE can collaborate with Public Safety Canada to build on and socialize the first year of reports.

Research from the International Labour Organization, Walk Free and the International Organization for Migration indicated that 50 million people are held in slavery globally, an increase of 10 million victims compared to 2016 global estimates. The report also indicated that 3.3 million children are victims of forced labour.¹⁷

To ensure that Canadian entities are working together toward the elimination of forced and child labour, we recommend that the Public Safety Canada and the Canadian Ombudsperson for Responsible Enterprise to take the following actions:

- a) Assess the quality reporting on forced and child labour in their supply chains, including examining whether actual instances of forced and child labour are being identified in reports and what remediation mechanisms were available to victims. A good example of this type of effort can be found [here](#).
- b) Inform the Canadian government's global investment and engagement priorities by identifying source countries where Canadian entities are reporting high rates of forced and child labour then cross-referencing with country reports from the U.S. Department of State's annual [Trafficking in Persons Report](#)
- c) Develop further reporting guidance to address issues that have arisen in the reporting process, remediation and victim support efforts.
- d) Identify and promote training programs and tools currently used by Canadian entities to educate relevant staff on forced and child labour.

¹⁷ International Labour Organization, Walk Free, International Organization for Migration, "Global Estimates of Modern Slavery, Forced Labour and Forced Marriage," September 12, 2022, <https://www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage>.

- e) Based on learnings from supply chain reports, share recommendations on actions institutions can take to improve their procurement systems and practices.

Recommendation 5: That the Government amend Bill C-63, Online Harms Act, to include private platforms.

IJM commends the Canadian government for introducing Bill C-63 and its efforts to protect children from online sexual exploitation and abuse. Nevertheless, Bill C-63 does not include private platforms where grooming and new CSAM, including livestreams, occurs.

Survey data released by *Protect Children* in February 2024 revealed that 37% of CSAM viewers first established contact with a child via a messenger, mostly via end-to-end encrypted messengers Telegram (45%) and WhatsApp (41%). The next most mentioned apps include Signal (28%), WickrMe (25%), Session (21%), Viber (16%), and Wire (12%). Other platforms mentioned by respondents include Discord, Omegle, Snapchat, and Likee.¹⁸

Including private platforms in the scope of Bill C-63 will ensure the \$37M estimated for fiscal years 2024-2026 of the Digital Safety Commission will reduce CSAM creation, production, and dissemination on platforms with private communication channels.¹⁹ This amendment will protect millions of children in Canada and globally who are being sexually exploited by Canadians today.

¹⁸ Suojellaan Lapsia, Protect Children ry, “Tech Platforms Used by Online Child Sexual Abuse Offenders: Research Report with Actionable Recommendations for the Tech Industry,” 2024, https://bd9606b6-40f8-4128-b03a-9282bdcffof.usrfiles.com/ugd/bd9606_0d8ae7365a8f4bfc977d8e7aeb2a1e1a.pdf.

¹⁹ Zachary Vrhovsek, “The Online Harms Act: Establishment of a Digital Safety Commission, Ombudsperson and Office,” Office of the Parliamentary Budget Officer, July 4, 2024, <https://www.pbo-dpb.ca/en/publications/LEG-2425-008-M--online-harms-act-establishment-digital-safety-commission-ombudsperson-office--loi-prejudices-ligne-etablissement-commission-ombudsman-bureau-securite-numerique#:~:text=The%20PBO%20estimates%20that%20from,the%20Commission%2C%20Ombudsperson%20and%20Office.>