



**Kind Attention: Honourable Members of the Senate Standing Committee on Foreign Affairs and International Trade**

**Date: March 28, 2017**

**Honourable Senators,**

On Wednesday March 29<sup>th</sup>, 2017 the Senate Standing Committee on Foreign Affairs and International Trade is expected to commence clause-by-clause consideration of Bill S-219, the Non-Nuclear Sanctions Against Iran Act. As has been brought to your attention in a previous letter by my colleague, several Canadian experts who have requested to present their views regarding S-219 were not provided the opportunity to testify, while the steering committee decided to invite 3 witnesses from a single American organization that has officially endorsed Bill S-219, the Foundation for Defence of Democracies (FDD). Unfortunately, the Committee Chair has rejected our request to delay clause-by-clause consideration to allow for the invitation of Canadian experts who have requested to present their opinions about this bill. With this in mind, on behalf of the Iranian Canadian Congress (ICC) I would like to once again ask you to vote against the entirety of Bill S-219 during the Committee meeting scheduled for this Wednesday, March 29<sup>th</sup>, 2017.

As we discussed during our presentation to the committee on Feb 9, 2017, the ICC is deeply concerned about the consequences of Bill S-219. We believe that the proposed bill should be rejected in its entirety as it contradicts the stated foreign policy of the federal government of Canada, imposes unnecessary limitations on the authorities of our Foreign Affairs Ministry, and blocks the path of reengagement between Canada and Iran.

In essence, Bill S-219 seeks to continue the same failed policies of economic and diplomatic disengagement from Iran that the previous Canadian government under former Prime Minister Harper endorsed and enacted. The ICC's position on this Bill S-219 can be divided into five main points:

1. Sanctions and diplomatic disengagement from Iran harms Iranian-Canadians, a population estimated at 300,000 countrywide, by: depriving them of consular services, exposing them to further discrimination by banks, and depriving them of representation by Canadian officials in Iran.



2. Sanctions and diplomatic disengagement from Iran harm Canada's economy; Canadian businesses have lost a figure estimated at between \$1.18 and \$4.69 billion in the years between 2010-2014 due to sanctions on Iran.
3. Bill S-219's prevention of economic re-engagement with Iran puts Canada outside of the mainstream of the international community and our allies. Specific provisions of Bill S-219 may even constitute a violation of the UN Security Council Resolution 2231 which formalized the Iran nuclear agreement. The UNSC resolution clearly states that countries shall lift sanctions on Iran in return for Iran's compliance with the terms of the JCPOA.
4. The Iranian Canadian Congress maintains its position that to advocate for human rights in Iran and around the world Canada must implement a policy of constructive engagement through diplomacy and dialogue.
5. Bill S-219 ignores the universal nature of human rights and our obligation as a member of the international community to be fair and unbiased in promoting respect for human rights around the world. Bill S-219 ignores gross violations of human rights by other countries in the region and around the world, some of whom have violated multiple United Nations resolutions. Respect for human rights is a universal obligation and should not be affected by political bias or become a currency for special interests and political maneuvering. Additionally, our parliamentarians should be aware that passing Bill S-219 will create a legislative precedent that may lead to subsequent bills for imposing similar sanctions on other human rights violators, some of which are Canada's allies and trade partners in the region. This action will have significant and lasting impacts on Canada's relations with its partners around the world and its impact has to be considered and analyzed thoroughly.

For the reasons outlined above, on behalf of the Iranian Canadian Congress I request that you vote against Bill S-219 during the next session of the Senate Foreign Affairs Committee, and support a motion for the Committee to recommend that the Senate not proceed with this bill.

If you have any questions, please do not hesitate to contact me directly at 416 890 4983.

Sincerely,

**Bijan Ahmadi**

**President**

**Iranian Canadian Congress (ICC)**

**Kind Attention:** Honourable Senator Raynell Andreychuk, Chair of the Senate Standing Committee on Foreign Affairs and International Trade.

**CC:** Honourable Senators of the Senate Standing Committee on Foreign Affairs and International Trade.

This letter is written on behalf of the Iranian Canadian Congress (ICC) to complain about the proceedings on Bill S-219, the Non-Nuclear Sanctions Against Iran Act. We believe that there has been a clear and consistent bias shown in favour of the Bill both in terms of the witnesses called before the Committee and the procedures leading to the clause-by-clause consideration.

Since Bill S-219 was introduced by Senator Tkachuk, multiple witnesses with pro-sanctions and anti-diplomacy views have been invited, while expert witnesses with opposing views were very limited. Particularly egregious is the invitation of three (3) members from one organization, the known hawkish American think-tank, the Foundation for Defense of Democracies (FDD). The Iranian Canadian Congress is aware that a number of Canadian experts on foreign affairs and Iran with diverse views have requested to present before the Committee as witnesses but have not been chosen, while, as mentioned, multiple witnesses have been called from the FDD. This is an unacceptable course of action which deprives the Committee of expert Canadian perspectives while privileging foreign views which do not have Canadians' best interests at heart.

Lastly, our view is that the the common Senate procedure is being ignored by scheduling the clause-by-clause consideration of Bill S-219 on the same day as a witness testimony, once again by a witness from the Foundation for Defense of Democracies, on March 29th, 2017. According to Senate Procedure in Practice (June 2015):

"clause-by-clause consideration of a bill does not take place at a meeting during which witnesses on the bill are heard...committees tend to avoid this practice, ensuring that senators have adequate opportunity to reflect on the testimony of witnesses and to prepare amendments if they so wish"

This matter is especially concerning in the case of Bill S-219 and the meeting scheduled on March 29th, 2017; once again, the invited witness in this meeting is from the Foundation for Defense of Democracies (FDD) and will be speaking in favor of the bill. Committee members should have time to consider the different testimonies and reflect on the facts that will be provided before moving into clause-by-clause consideration, rather than moving into the clause-by-clause consideration immediately after a witness has spoken in favour of the Bill.

We therefore ask that the Senate Standing Committee on Foreign Affairs and International Trade delay the clause-by-clause consideration of Bill S-219 until after more Canadian experts on Iran and Canadian foreign policy are provided the opportunity to present their diverse views to the Committee about this bill. Secondly, we ask that the Standing Committee follows common procedure and not schedule the clause-by-clause consideration of this Bill on the same day as the presentation of witness testimony. It is vital for the integrity of the Senate Standing Committee on Foreign Affairs and International Trade to take these actions to ensure a fair and unbiased review process for Bill S-219, an important bill whose ambitions reach far beyond our borders.

Sincerely,

Pouyan Tabasinejad, Policy Chair of the Iranian Canadian Congress  
On behalf of the Board of Directors of the Iranian Canadian Congress

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