

Management Response and Action Plan (MRAP): Evaluation of Global Affairs Canada’s Sanctions Operations, 2018-2024

Recommendation 1:

Formalize and publish comprehensive written guidance for the public and private sector, to assist Canada’s public and private sector in interpreting sanctions regulations, and to fulfill Global Affairs’ obligations as a regulator.

Management response and commitment

ISD fully agrees with the recommendation. ISD notes the importance of undertaking efforts to ensure that stakeholders in the public and private sector have the resources to fully and effectively comply with Canadian sanctions. While the department can provide guidance that aligns with normal regulatory responsibilities, it is important to note that it cannot provide legal advice to members of the public.

Work is already underway to bolster existing written guidance on the GAC sanctions webpage, including “Frequently Asked Questions”, which is the primary vehicle used to provide stakeholder guidance. ISD will continue to consider different formats of guidance, similar to what like-minded allies employ.

ISD will also continue to increase stakeholder outreach efforts to improve stakeholder understanding of Canadian sanctions and their compliance obligations, to ensure stakeholders are aware of the guidance resources that exist, and to solicit their feedback.

Actions	Expected Deliverables / Outcomes	Responsibility Centre (Bureau / Division)	Target Date
1.1 <ul style="list-style-type: none"> Continue to bolster existing written guidance on the GAC sanctions webpage, including updated “Frequently Asked Questions”. 	1.1 <ul style="list-style-type: none"> More comprehensive written guidance, both in terms of detail and breadth of topics covered, available on the GAC sanctions webpage. Increased stakeholder understanding of Canadian sanctions, particularly in terms of compliance obligations. Improved stakeholder relations. 	1.1 ISD/ISO – with the support of CBSA, RCMP, FIN, FINTRAC, and other teams within GAC (as needed).	1.1 December 2025

Actions	Expected Deliverables / Outcomes	Responsibility Centre (Bureau / Division)	Target Date
1.2 <ul style="list-style-type: none"> Continue to increase stakeholder outreach efforts, improve engagements and solicit feedback to identify ongoing gaps in the terms of the allowable guidance that the department can provide. 	1.2 <ul style="list-style-type: none"> Increased stakeholder outreach events, minimum 5 per year. Increased stakeholder understanding of Canadian sanctions, particularly in terms of compliance obligations. Improved stakeholder relations. 	1.2 ISD/ISO – with the support of CBSA, RCMP, FIN, FINTRAC, and other teams within GAC (as needed).	1.2 December 2025

Recommendation 2:

Prioritize strategies to improve the efficiency of permit application processing, which could include consideration of:

- A more automated system for processing permit applications, or for export related permits, integrating into TID's NEXCOL system;
- The use of general permits and exceptions; and
- Delegating the authority required for approving a wider range of permits to lower levels.

Management response and commitment

ISD partially agrees with the recommendation. ISD notes the importance of striving to process sanctions-related permit applications as quickly as possible. However, each permit application is unique and may involve varying degrees of complexity. Administrative law requires due diligence for each permit application to ensure the integrity of Canada's sanctions regime, and the processing of each application often requires broad consultations across the Government of Canada.

Work is underway to develop an IT case management system to streamline the department's sanctions operations, including processing permit applications. This includes an ongoing assessment of available IT systems to determine the best solution to meet the needs of the sanctions bureau.

Since the completion of this evaluation, ISD has sought and obtained Treasury Board approval to enable the Minister of Foreign Affairs to issue general permits with respect to each of the sanctions regimes within SEMA. With this authority in place, ISD will assess and recommend situations in which a general permit could be considered. Concurrently, ISD will continue to examine the use of exceptions across all sanctions regimes, with the dual objectives of reducing the number of permits applications that are submitted, and minimizing adverse consequences for the civilian population, including vulnerable groups, or for legitimate business, humanitarian, or other activities. ISD will also explore the feasibility of seeking the delegation of authority for decision-making on permit applications to lower levels.

Importantly, final decisions on general permits and exceptions ultimately rest with the Governor in Council (based on the Minister of Foreign Affairs' recommendation) and final decisions on delegated authority to make decisions on permit applications rests with the Minister of Foreign Affairs.

Actions	Expected Deliverables / Outcomes	Responsibility Centre (Bureau / Division)	Target Date
<p>2.1</p> <ul style="list-style-type: none"> Continue to work with implicated teams within the department to develop an IT case management system to streamline the department's sanctions operations, including processing permit applications. 	<p>2.1</p> <ul style="list-style-type: none"> IT case management system developed. Improved streamlining of permit application processing. 	<p>2.1</p> <p>ISD/ISO – in close collaboration with SID/SIEO, SITR, SITT, SIAG.</p>	<p>2.1</p> <p>December 2025</p>
<p>2.2</p> <ul style="list-style-type: none"> Work closely with geographic divisions and the GAC legal services unit to evaluate the potential use of general permits when appropriate. Present recommendations to offices of the Deputy Minister and Minister, if it is determined that the use of general permits should be considered in a given situation or sanctions regime. <ul style="list-style-type: none"> Implement decisions accordingly. 	<p>2.2</p> <ul style="list-style-type: none"> General permits are issued in appropriate circumstances, thereby reducing specific permit workload and contributing to achieving Canada's foreign policy goals in specific circumstances. 	<p>2.2</p> <p>ISD/ISO – with the support of implicated geographic divisions and the GAC legal services unit.</p>	<p>2.2</p> <p>March 2026</p>
<p>2.3</p> <ul style="list-style-type: none"> Explore the feasibility of seeking the delegation of authority for approving permits to lower levels. 	<p>2.3</p> <ul style="list-style-type: none"> Delegating authority for decision-making on permit applications to lower levels is thoroughly analyzed as an option to improve efficiency of permit application processing. Recommendations are presented to the offices of the Deputy Minister and Minister, and implemented (as applicable). 	<p>2.3</p> <p>ISD/ISO</p>	<p>2.3</p> <p>December 2026</p>

Recommendation 3:

The Sanctions Bureau (ISD) should work together with GAC's new Pan-geographic Affairs Branch (GFM) to develop an action plan to ensure that geographic desks are effectively supported in the research, development, and implementation of sanctions. This strategy should go beyond the provision of tools and training, and should seek to ensure that, when necessary, geographic desks have access to surge support for open-source research required to support designations.

Management response and commitment

ISD and GFM generally disagree with this recommendation.

While both organizations note the importance of resourcing in geographic bureaus to advance work on sanctions, GFM has not been adequately resourced to provide surge support in these circumstances. In addition, sanctions work is specific to the country in question, requiring ISD to work with the desk responsible for the sanctions on that particular issue. As a result, assigning accountabilities to GFM for this function in these circumstances would create additional bureaucracy and not be an effective or efficient use of resources. ISD will, however, work directly with geographic bureaus to provide guidance and training across all aspects of Canada's sanctions functions. In addition, geographic divisions will determine how best to allocate their resources to deliver on government priorities, including through accessing the department's new Agility Roster, when necessary.

Actions	Expected Deliverables / Outcomes	Responsibility Centre (Bureau / Division)	Target Date
3.1 ISD to update its training and guidance on sanctions operations based on needs assessment findings.	3.1 • Training sessions for geos on sanctions operations held as required.	3.1 ISD/ISL/ISP/ISO , with support from geographic divisions	3.1 June 2026

Recommendation 4:

Strengthen the strategic policy role of the Sanctions Bureau. This might include:

- Formalizing policies that help guide internal decision-making, including policy guidance around when to use sanctions;
- Dedicating staff to follow and analyze policy developments affecting the sanctions landscape domestically and internationally; and
- Increasing capacity to address emerging policy issues more proactively.

Management response and commitment

ISD fully agrees with this recommendation. ISD notes the importance of strengthening the strategic policy role of the Sanctions Bureau.

Over the past several months, ISD has undergone a transformation from a single division to a bureau of three divisions, one of which is focused on sanctions policy (approximately 22 FTEs, when fully staffed). As the Sanctions Policy Division continues to staff-up, it will dedicate increasing resources to formalizing sanctions-related policies, following and analyzing sanctions-related policy developments, and addressing emerging sanctions-related policy issues.

Actions	Expected Deliverables / Outcomes	Responsibility Centre (Bureau / Division)	Target Date
<p>4.1</p> <ul style="list-style-type: none"> • Identify existing sanctions policy gaps and develop a workplan to address them. • Consult with implicated teams (including geographic divisions) in the development of formalized sanctions policies and policy-related products. • Monitor, analyze, and address sanctions-related policy developments, as needed. 	<p>4.1</p> <ul style="list-style-type: none"> • Creation of formalized sanctions policy-related products. • Improved coherence of Canadian sanctions policy and the use of sanctions as a Canadian foreign policy tool. • Increased capacity for the department to respond to sanctions-related policy developments. 	<p>4.1</p> <p>ISD/ISP – with the support of implicated geographic divisions (and others, as needed).</p>	<p>4.1</p> <p>December 2025</p>

Recommendation 5:

In order to improve efficiency and effectiveness in the operational environment of Canadian sanctions, **consider undertaking a comprehensive review of:**

- overall policy coherence
- authorities and roles
- definitions and concepts
- level of authority for approval of regulations

This could take the form of a department-led legislative review.

Management response and commitment

ISD partially agrees with the recommendation.

ISD notes the importance of ensuring that Canadian sanctions legislation is fit for purpose, particularly given the increased prominence of autonomous sanctions as a Canadian foreign policy tool necessitates careful consideration of how to administer and enforce them in the most appropriate manner possible. However, ISD also notes that undertaking a formal legislative review and pursuing legislative amendments to Canadian sanctions legislation would require Cabinet approval.

Both the *Special Economic Measures Act (SEMA)* and the *Justice for Victims of Corrupt Foreign Officials Act (JVCFOA)* have been recently amended to bolster their effectiveness, including:

- June 2022 – to allow for the seizure and possible forfeiture of assets in Canada belonging to designated individuals/entities under both the SEMA and JVCFOA; and
- June 2023 – to expand the scope of who can be designated under the SEMA.

More broadly, ISD continues to leverage its expertise, and lessons learned from the increased use of sanctions following the Russian invasion of Ukraine in February 2022, to identify potential areas for improvement in Canadian sanctions legislation. Should there be an opportunity to pursue a department-led legislative amendments to the Acts, ISD remains committed to identifying and addressing key areas for enhancement.

Actions	Expected Deliverables / Outcomes	Responsibility Centre (Bureau / Division)	Target Date
5.1 <ul style="list-style-type: none"> • Continue to identify areas for improvement in Canadian sanctions legislation and analyze potential amendments to enhance policy coherence; authorities and roles; definitions and concepts; level of authority 	5.1 <ul style="list-style-type: none"> • Identification of potential issues in existing Canadian sanctions legislation and development of potential amendments to address them. 	5.1 ISD/ISP – with the support of CBSA, RCMP, FIN, TBS, PCO, and other implicated teams with GAC (as needed).	5.1 December 2025

Actions	Expected Deliverables / Outcomes	Responsibility Centre (Bureau / Division)	Target Date
<p>for regulatory approvals. This may include considerations for a departmental-led legislative review.</p>	<ul style="list-style-type: none"> o Identification of specific provisions that may require amendment to enhance their effectiveness. o Engage relevant government departments and other implicated teams with GAC to ensure amendments are administered and enforced. o Consideration of a department-led legislative review as a means to assess and address these issues. 		
<p>5.2</p> <ul style="list-style-type: none"> • Engage with offices of the Deputy Minister and Minister of Foreign Affairs to assess desire to pursue a legislative review. <ul style="list-style-type: none"> o Leverage internal analysis, legal assessments, and consultations with key stakeholders to ensure a well-informed decision recommendation. • If approved, draft and submit a Memorandum to Cabinet seeking authority to proceed with a legislative review. <ul style="list-style-type: none"> o Outline the need for a legislative review, key areas of concern, policy considerations, and possible amendments to improve the effectiveness and clarity of sanctions legislation. 	<p>5.2</p> <ul style="list-style-type: none"> • Senior management direction on whether to proceed with seeking Cabinet approval for a formal legislative review. • Possible development of a Memorandum to Cabinet to pursue a legislative review. <ul style="list-style-type: none"> o Possible Cabinet approval to pursue a legislative review and legislative amendments. 	<p>5.2</p> <p>ISD/ISP – with the support of CBSA, RCMP, FIN, TBS, PCO, and other implicated teams with GAC (as needed).</p>	<p>5.2</p> <p>March 2026</p>