

## Election Campaign and Party Financing in Canada

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As part of a broader extension of state oversight of the conduct of elections and the operation of political parties, successive Canadian governments have sought to control the impact of money on politics. Since the 1960s in particular, they have been concerned to place limits on campaign spending by parties, make transparent their inter-campaign expenditures and the source and size of their private funding, and to underwrite the cost of elections for candidates and parties. Much of this was achieved in the *Election Expenses Act* of 1974.

In contrast to the United States then, the traditional Canadian approach paid only modest attention to the contribution side of the equation and public funding in the main was directed at election campaigns.

This all changed for the June 28, 2004 general election, which was conducted under new rules that attempt to control contributions in ways similar to those found in several provinces and first seen in Quebec. Amendments to the *Canada Elections Act* and the *Income Tax Act (Political Financing)* contained in Bill C-24, adopted in June 2003 stipulate that:

- Only individuals may make contributions to registered political parties
- Corporations, unions and other entities may make contributions of only \$1,000 per annum in the aggregate to the candidates, nomination contestants and registered electoral district associations of each registered party.
- Each citizen or permanent resident of the country may contribute up to \$5,000 per annum to each registered party and its affiliated entities, registered electoral district associations, candidates and nomination contestants.
- Individuals may contribute up to \$5,000 per leadership contest.

The legislation also provides for a more generous framework of public funding for candidates and political parties and extends it to the inter-election period:

- Registered political parties will receive an annual allowance calculated at a rate of \$1.75 (indexed to inflation) for each vote the party won in the most recent general election if they receive at least 2 per cent of all votes cast nationally or 5 per cent in electoral districts in which it has candidates.
- The rate of reimbursement for election expenses of registered political parties increases from 22.5 per cent to 50 per cent (60 per cent for the first election following adoption of the law, that is, the June 2004 election).
- The threshold for reimbursement of candidate's election expenses will be lowered from 15 per cent to 10 per cent of the valid vote obtained, while the percentage of

elections expenses eligible for reimbursement will be increased from 50 per cent to 60 per cent.

- The upper limit of the full political contribution tax credit – which gives individuals a 75 per cent tax credit for donations to political parties – is now \$400, up from \$200, with other upward adjustments to the scale of credit for larger donations.

The new regulations push state involvement deep into parties, requiring these limits be applied to leadership contests (which are generally organized as plebiscites of party members) and the local candidate nomination contests that precede elections. They also require local associations to file annual financial reports, something only required of parties in the past. As well, recent changes to the definition of a party mean those candidates from parties with as few as 250 members who meet the thresholds will qualify for these reimbursements.

### Impact of the new regulations

While it is too early to provide a complete analysis of the full impact of recent changes, some implications and patterns are identifiable. One is the huge increase in funding available to parties, despite their reduced capacity to attract large contributions from unions, corporations or individuals. As Table 1 shows, the total direct allocation to parties for 2004 is about \$22 million (that is, excluding reimbursements for election expenses: see Table 2 for these). This is more than double the projected loss of \$10 million in the parties’ revenues as a result of the new limits on contributions.

Each individual party’s fortunes will improve under the new regime, although the magnitude of this improvement will vary from a paltry 8 per cent for the New Democratic Party (NDP) to an astounding 256 per cent increase in income for the Bloc Québécois (BQ). Despite their opposition to the new legislation, the new Conservative Party did very well under the new arrangements, which certainly levelled the playing field with the Liberal Party (LPC) at the election. The actual effect is difficult to know as the new leader of the LPC (since November 2003) and prime minister, Paul Martin, transferred money left over from his leadership bid to the party prior to these new rules coming into effect. The amount is believed to have been in the order of 9 million dollars.

**Table 1: Notional Non-Election Year Income of Political Parties**

Party	2001 Total Contributions	2001 Total Contributions under law	2001 Total new	2004 Allocation @ \$1.75/vote	New Total Income	% change	Estimated cost of tax credit	Direct Public Funding as %	Total Public Funding as %
BQ	\$898,151	\$786,707		\$2,411,022	\$3,197,730	256%	\$322,294	75%	85%
CPC	\$8,516,449	\$6,058,054		\$8,476,873	\$14,534,927	71%	\$3,593,567	58%	83%
LPC	\$12,450,325	\$5,658,496		\$9,191,054	\$14,868,624	19%	\$1,669,177	62%	73%
NDP	\$5,043,705	\$3,507,730		\$1,914,269	\$5,422,149	8%	\$2,472,569	35%	81%
<b>TOTAL</b>	<b>\$26,908,630</b>	<b>\$16,010,987</b>		<b>\$21,993,218</b>	<b>\$38,023,430</b>	<b>41%</b>	<b>\$8,057,607</b>	<b>58%</b>	<b>79%</b>

**Notes:** Figures for the Conservative Party of Canada (CPC) combine those for the two former parties that merged to create this new entity in 2003.

Source: Young’s calculations using data from Elections Canada and Canada Customs and Revenue.<sup>1</sup>

The rules that governed the 2004 election were somewhat idiosyncratic and produced an associated peculiarity. Normally, public funding is distributed quarterly, but C-24 enabled Elections Canada to pre-pay parties their entire yearly allowance on January 31, 2004. As the vote share of the two major (LPC and CPC) parties declined, their allowances for 2004, based on their 2000 vote share, were too generous. Parties whose vote dropped had access to ‘more’ money than might be their due for the rest of 2004 – about \$250,000 for the Liberals and \$800,000 for the Conservatives – and are required to reimburse this amount to Elections Canada.

The merger of the two right wing parties – the Progressive Conservative and the Canadian Alliance – into a new Conservative Party (CPC) compounded the problem. Elections Canada simply combined the 2000 vote share of the two former parties in calculating the new Conservative’s allowance. The new party’s vote share was substantially less than this in 2004. Those parties who increased their votes share – the NDP, BQ and the Green Party (GP) – arguably suffered as their allowance was based on a lower vote share from the 2000 election. The BQ will receive an additional \$250,000 per annum, and the NDP \$800,000.

Not included in Table 1 is the impact of the new rules on the Green Party. Having received nothing as a result of its showing in the 2000 election, the approximately half-a-million votes in attracted in 2004 took it over the new national 2 per cent threshold, and gave it an annual allowance of around a million dollars. This money has enabled it to establish a permanent national headquarters.

The 2004 election resulted in a minority government and revealed another unintended consequence of the new legislation. Such governments have traditionally been short-lived, with another election expected within 2 years. In the past, this short time frame was awkward for party fundraising, but access to large contributions allowed them to still raise sizable war chests. Public funding will now be delivered quarterly, so that building the necessary funds will take some time.<sup>2</sup>

It is worth noting that the new rules may well have helped revive the fortunes of the separatist BQ. It received virtually no corporate or union financing in the past and lost nothing under the new rules. Deeply divided and in poor financial shape in the year leading up to the election, the enormous increase in its funding was all directed at campaigning in Quebec, allowing it to take full advantage of the Liberal government’s problems in that province stemming from a funding scandal. As well, to the degree that the CPC remains a predominantly western party, it would seem the new rules have done nothing for national unity in what can be a regionally fractious country.

Table 1 and 2 allow us to approximate the funding cycle for Canadian parties. As an example, the Liberal Party of Canada might expect to attract contributions and public funding of about \$14 million dollars per annum between elections rising to \$22 million in an election year. In a normal four-year electoral cycle its income should be in the vicinity of \$64 million in current dollars.

**Table 2: Notional Election Year Income of Political Parties**

Party	2004 Election Expenses Reimbursement <sup>1</sup>	2004 Allocation @ \$1.75/vote	Estimated Voter Contributions <sup>2</sup>	Total 2004 Income <sup>3</sup>	Total Public Funding as %
<b>BQ</b>	\$1,075,709	\$2,411,022	\$786,707	\$4,273,438	89%
<b>CPC</b>	\$8,094,968	\$8,476,873	\$6,058,054	\$22,629,895	89%
<b>LPC</b>	\$7,472,522	\$9,191,054	\$5,658,496	\$22,322,072	82%
<b>NDP</b>	\$3,786,553	\$1,914,269	\$3,507,730	\$9,208,552	89%
<b>TOTAL</b>	<b>\$20,429,752</b>	<b>\$21,993,218</b>	<b>\$16,010,987</b> (\$8,057,607)	<b>\$58,433,957</b>	<b>86%</b>

See Appendix 1 for notes, assumptions and sources.

The finances of the national parties do not give a full picture of neither the money spent at general elections nor the public funding attached to election years in Canada. In an average election, total spending by candidates is about equivalent to that spent by the central parties. In the recent 2004 election the national parties most probably spent around \$50 million in total. Given that individual candidates have historically spent about this amount, total spending on the election would have been in the order of \$100 million.

This is possible because unlike Australia, Canadian election law provides two distinct forms of election funding: one to the national party organization as noted in Tables 1 and 2 which is something like that found in Australia; and a second that goes directly to local candidates and campaigns and through them, to constituency associations. A more complete picture of money in Canadian elections requires consideration of candidate contributions and funding. By requiring local associations to submit annual reports, the new legislature is aimed at keeping track of these money flows.

**Table 3: Notional Election Year Income of Candidates and Political Parties**

Party	2004 Candidate Election Expense Reimbursement <sup>1</sup>	2004 Voter Contributions to Candidates under new law <sup>2</sup>	Total 2004 Candidate Income	Total 2004 Income – Candidates and Parties <sup>4</sup>	Total Public Funding as %
<b>BQ</b>	\$2,580,376	\$3,461,184	\$6,041,580	\$10,315,018	79%
<b>CPC</b>	\$7,000,342	\$4,176,217	\$11,176,559	\$33,806,454	82%
<b>LPC</b>	\$8,444,308	\$5,778,386	\$14, 222,694	\$36,544,766	81%
<b>NDP</b>	\$1,424,475	\$1,820,793	\$3,245,268	\$12,453,820	85%
<b>TOTAL</b>	<b>\$19,4449,501</b>	<b>\$15,236,580</b>	<b>\$34,686,101</b>	<b>\$93, 120,058</b>	<b>83%</b>

See Appendix 2 for notes, assumptions and sources.

Table 3 suggests that in an election year, about 35 per cent of total funding is channelled through individual candidates and their local campaign. As an example, whereas the central party income for the Liberal party was around \$22 million, total income is in fact around \$36 million raising its normal four year electoral cycle income to around \$80 million.

The new legal regime strengthens public funding of political parties and candidates so that it accounts for around four-fifths of total income. Perhaps more importantly, it extends state regulation into the workings of parties and local associations and strengthens the sense of

political parties as public electoral utilities that fulfill what were once the private functions of nominating candidates, grouping policies, and competing to form government.

### Canada and Australia compared

By comparison, Australian parties receive about 20 cents more per vote than do Canadian parties, and receive funding for their Senate votes (approximately doubling their funding). The Canadian Senate is appointed, and therefore generates no funds for the parties. Unlike Canada, Australian parties only receive this funding in election years rather than across the entire electoral cycle. This produces much greater fluctuations in the proportion of party income coming from public funds. The lack of restrictions on contributions to Australian parties means that the large parties in particular do much better than their Canadian counterparts and limits the impact of public funding. Whereas public funding now accounts for about four fifths of the total income of Canadian parties it accounts for less than one fifth of the income of the major Australian parties. Over a three-year cycle, the Labor party takes in about half as much again as the Liberal party in Canada over its four year cycle.

**Table 4: Public Funding for Australian Parties**

Party	Year	Public Funding	Total funding	Public to total (%)
Australian Democrats	2000/2001	\$24,513.65	1,316,688.59	1.9
Australian Democrats	2001/2002	\$2,563,422.00	5,581,331.08	45.9
Australian Democrats	2002/2003	\$41,313.00	851,653.84	4.9
<b>Democrats three year total</b>	<b>2000-2003</b>	<b>\$2,629,248.65</b>	<b>7,749,673.51</b>	<b>33.9</b>
Australian Labor Party	2000/2001	\$1,341,402.53	31,957,334.27	4.2
Australian Labor Party	2001/2002	\$15,843,740.00	60,797,263.24	26.1
Australian Labor Party	2002/2003	\$7,613,508.76	39,393,170.45	19.3
<b>Labor three year total</b>	<b>2000-2003</b>	<b>\$24,798,651.29</b>	<b>132,147,767.96</b>	<b>18.8</b>
Greens*	2000/2001	\$162,770.52	1,410,918.89	11.5
Greens*	2001/2002	\$1,301,017.28	3,577,302.23	36.4
Greens*	2002/2003	\$580,795.43	1,450,282.56	40.0
<b>Greens* three year total</b>	<b>2000-2003</b>	<b>\$2,044,583.23</b>	<b>6,438,503.68</b>	<b>31.8</b>
Liberal Party of Australia	2000/2001	\$860,728.55	23,130,963.79	3.7
Liberal Party of Australia	2001/2002	\$15,136,973.00	62,024,301.54	24.4
Liberal Party of Australia	2002/2003	\$5,014,700.00	35,022,982.65	14.3
<b>Liberal three year total</b>	<b>2000-2003</b>	<b>\$21,012,401.55</b>	<b>120,178,247.98</b>	<b>17.5</b>
National Party of Australia	2000/2001	\$507,871.58	6,649,817.09	7.6
National Party of Australia	2001/2002	\$2,990,074.00	9,534,179.02	31.4
National Party of Australia	2002/2003	\$1,352,054.84	8,956,007.30	15.1
<b>National three year total</b>	<b>2000-2003</b>	<b>\$4,850,000.42</b>	<b>25,140,003.41</b>	<b>19.3</b>

\* Greens figures are aggregates of all Green parties in Australia.

Years are 1 July to 30 June. Federal election in 2001/2002. Elections in states/territories with public funding: Queensland in 2000/2001; Australian Capital Territory in 2001/2002; Victoria and New South Wales in 2002/2003.

Figures provided by Peter Brent, Australian National University.

### **Other regulations**

As elsewhere, the search for equitable elections has led legislators into some unlikely areas, from the definition of a political party to attempts to control how and when election results might be reported in a country with six time zones. In 2004, Elections Canada chose not to appeal the decision of a British Columbian court striking down restrictions on the publication of results from eastern time-zones in the west before polls there had closed, effectively ending the control over the reporting of results. Rather, Elections Canada staggered the opening and closing times of polls in different time zones in order to reduce the severity of the lag.<sup>4</sup>

By far the most controversial court challenges have been in response to restriction on advertising by non-party organizations at election time. These have provoked numerous court challenges referencing the Canadian Charter of Rights and Freedoms, with the Supreme Court generally upholding restrictions on third party advertising.<sup>5</sup> By striking down or reinterpreting existing laws – sometimes provoking a legislative response – the Supreme Court is now a central player in regulating elections. For example, it declared provisions preventing prisoners from voting unconstitutional.<sup>6</sup>

In general then, the broadcast and advertising regime is relaxed. Other than restrictions on third party spending, there are restrictions only on political advertising and the broadcasting of opinion poll results on election day and the weekend before (elections are normally on a Monday).<sup>7</sup> In addition, broadcasters are required to provide election-advertising time to registered parties.<sup>8</sup>

### **Broader issues**

Attempts to control the influence of money in elections are ubiquitous in the democratic world. At base, it is the potentially corrupting influence of money – its capacity to distort election outcomes and the policy process – that drives this response. Preventing these outcomes has variously been associated with ensuring accountability, transparency, integrity and equity. There has also been growing interest in ensuring that the role of money in elections helps rather than hinders democracy and democratic participation.

The current changes have relatively little effect on accountability as existing legislation provides for the sort of transparency with respect to donations and expenditures that might be seen as necessary to ensure this is an achievable objective. Transparency itself is not much affected, although it could be argued that by limiting contributions and providing more public funding the environment in which elections occur is somewhat simplified and easier to understand, improving both transparency and accountability. Also, the extension of reporting requirements to local associations between elections improves transparency. The integrity of elections, to the degree that it refers to concerns about undue influence over decision makers, is most probably enhanced by the limit on large contributions.

In this regard, there is some concern however that companies and unions might be able to find ways of circumventing the restrictions on contributions, for example, by facilitating individual contributions by company directors or board members. In fact, it appears that in response to these restrictions parties are already encouraging their supporters to act as contribution coordinators, bringing together sets of maximum individual donations from their friends and associates. In return, they will gain the kind of preferential access to the party leader that was once offered to large donors.

Equity concerns focus on providing equal access and treatment for all candidates and parties. To the extent that some traditionally excluded groups – notably visible minorities and women – face financial barriers to participation in parties (for instance, seeking a nomination) and elections, these rules may improve access. Limiting money spent in nominations and elections and ensuring that there is a generous rebate scheme may prevent party cliques from controlling nomination outcomes, encouraging participation from formerly excluded groups. That said, the proportion of women in the Canadian House of Commons increased by less than 1 per cent as a result of the first election fought under the new rules.

The first election under the new rules suggests that the biggest effect may well be at the party level, easing the way for new parties. For the Green Party, the new regime was central to its election campaign which rested on the claim that a vote for it was no longer wasted and would help ensure the parties financial and organizational future. This in turn would ensure that environmental concerns would find a voice in the broader policy process. With a guaranteed annual income of around a million dollars, the party is now much better placed to shape public policy and work for electoral and perhaps even legislative gains.

As to its impact on democracy – strengthening political parties and citizen participation – it is likely that the effects of the new regime will be mixed. The financial strengthening of both existing and new parties is evident in Table 1. It is too early to know whether the hope that better public funding and the concomitant improvement in organizational capacity will allow parties to concentrate more heavily on policy formulation will be realized.

The strengthening of the Green Party holds out the hope that new voices will be able to sustain themselves long enough to mount serious electoral and perhaps legislative challenges, opening up the political process. But it is also the case that raising the amount of money available to parties – and the amount spent on day-to-day administration and at elections – will act as a barrier to entry for potential new parties.

As to encouraging greater citizen participation, this too seems uncertain: voter turnout declined somewhat over 2000 to reach an historical low of about 60 per cent in 2004. Moreover, greater public funding reduces the incentives for parties to engage with voters whether on policy, as members, and perhaps as donors (the need to attract many small donations may offset these effects). As well, new requirements under the legislation provide central party organizations with opportunities to sanction local associations or even disband them. The traditional power of local associations in Canadian parties which attracted local volunteers – one of their distinctive characteristics in comparative terms – may well be reduced or lost under this legislation. There is some evidence in Tables 2 and 3 of the growing financial power of central parties as they combine their traditional election funding with the yearly – \$1.75 per vote – funding. We might expect future campaigns to be more shaped by national strategists rather than local strategists. What this means in the Canadian case is always unclear, as ‘national’ strategists often work for parties with a decidedly regional focus.

A final consideration is the way in which electoral regulations are designed. Political parties construct the rules that govern the electoral process. This conflict of interest is profound. For instance, a study of 74 State elections in Australia that followed the redrawing of district boundaries noted that the incumbent party responsible for setting the new rules was favoured in 65 of them.<sup>11</sup> Fortunately for democracy, chance and unintended consequences often usurp

the intentions of electoral engineers. The situation in Canada is potentially more serious. The electoral hegemony of the Liberal Party nationally and prime ministerial dominance of the legislative process suggests that regulations governing elections might easily be made to favour incumbents.

Yet one of the strangest aspects of the new legislation is that it has arguably hurt the governing party more than any other. The Liberal Party was by far the biggest collector of large corporate donations. Not only has the legislation levelled the playing field with the Conservatives, it places a premium on donations from individuals. In recent years, this has been strength of some elements of the newly merged Conservative Party. The best explanation for this appears to be that the outgoing prime minister, galvanized by a number of scandals, used his control of the legislative agenda to push through the legislation as part of his commitment to democratic reform. This despite great opposition from within his own party, with the president of the party calling the legislation “as dumb as a bag of hammers.”

### **Summary**

In sum, the calling of an election so soon after the new funding arrangements came into place has made it difficult to discern the impact of the new regulations. However, as with the 1974 election expenses legislation, there are already indications that it too will have profound implications for the conduct of elections and the nature of party organization in Canada. As to its impact on the quality of Canadian democracy, the initial evidence is mixed, with the question being at this point largely open. We will need to wait for subsequent elections – the first perhaps but two years hence – and some inter-election years in a more normal legislative cycle before teasing out more fully the implications for democracy of this new party financing and election spending legislation.

### **About the authors**

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## Appendix 1

### Notes for Table 2: Notional Election Year Income of Political Parties

Calculated from Elections Canada data available at

<http://www.elections.ca/content.asp?section=fin&document=table1&lang=e&textonly=false>, accessed September 2, 2004.

**Notes:** 1. These are estimations as the data are not yet available. While the total amount for 2004 should be close to that shown, due to the variables that determine the reimbursements, the actual partisan distribution will be considerably different from that shown. Amounts here were calculated by multiplying the 2000 amount for each party by 2.66, the factor increase in public funding over 2001 provided for under C-24. The amount for the CPC, based on combining election spending for the two conservative parties that merged to form the CPC is nearly certainly too generous – and so too its total income for 2004 – but there is no obvious way of objectively fixing this amount.

2. This is an estimation given the new rules of C-24. These contributions incur a public cost, as taxpayers receive a tax credit for part of their donations to political parties (see Table 1). The total estimated public tax credit is shown in parentheses. As these calculations from table 1 are from a non-election year, these estimates are likely conservative and therefore may result in some over-estimation of the proportion of income accounted for by public funding.

3. Given the extensive number of unknowns, this is a very rough guide to election year income. For ease of presentation, reimbursements to individual candidates are included in this figure, which may not be an accurate reflection of central party income, although it is worth noting that some parties are considering taxing candidate reimbursements.

## Appendix 2

### Notes for Table 3: Notional Election Year Income of Candidates and Political Parties

**Notes:** 1. These are estimations based on the reimbursements to individual candidates from the 2000 election (<http://www.elections.ca/content.asp?section=fin&document=table&dir=rem&lang=e&textonly=false>) multiplied by a factor of 1.2, the increase mandated by C-24. These figures are very much understatements, as not all the returns for 2000 have been processed, and C-24 lowers the threshold at which candidates receive reimbursements for the 2004 elections.

2. Given that 2004 data are unavailable, these numbers are extrapolations of 2000 data using a number of heroic assumptions too complicated to list here, but required because the impact of C-24 is difficult to predict and further complicated by the creation of a new party, the CPC. These assumptions can be retrieved from the authors via email at [asayers@ucalgary.ca](mailto:asayers@ucalgary.ca). Furthermore, as of September 2004, the 2000 data from Elections Canada is still incomplete. It is assumed that about 50 per cent of this amount will be returned to contributing voters as a tax credit and hence forms part of public funding.

3. Adding the amount for the two former parties that merged to create the CPC would inflate this figure, as it would provide for twice the number of candidates to which voters could contribute. This figure was arrived at by adding the amounts for the two parties and halving this number.

4. The sum of candidate income from this table, and total notional party income from table 3.

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<sup>1</sup> Lisa Young, 'Regulating Campaign Finances in Canada: Strengths and Weaknesses', *Election Law Journal*, Vol. 3, No.3 2004, 444 – 462.

<sup>2</sup> The mandated limit on central party expenditures for the largest three parties in 2004 (based on the number of voters on the roll) was \$17,593,925.32. The calculation for each party represents how many quarterly instalments are required to reach 50 per cent of spending limit. This assumes parties will borrow an equivalent amount, and then use the 50 per cent public reimbursement of expenses to pay-off this loan. For the Liberals, this factor is 4.1, while for the Conservatives it is 5.0, the Bloc 3.1 and for the NDP, it will require 9.5 instalments to reach this amount. In fact, a rough calculation – assuming that parties would like to be able to spend the legislated maximum – suggests that the BQ will be 'ready' to fight an election in July of 2005, the Liberals in October of 2005, the Conservatives in January of 2006, and the NDP in January of 2007.

<sup>4</sup> *R. v. Bryan* (Supreme Court of British Columbia, October 23, 2003; application for leave to appeal to the British Columbia Court of Appeal granted, March 11, 2004). Bryan had been charged for publishing the results of the 2000 general election on the internet prior to polls closing in the most westerly time zone in British Columbia. He was initially convicted but the BC Supreme Court acquitted him on appeal. The BC Appeal Court granted leave to appeal this decision in March 2004, but Elections Canada has decided to respect the decision acquitting Bryan.

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<sup>5</sup> *Somerville v. Canada (Attorney General)* (Alberta Court of Appeal, June 5, 1996); [Libman v. Quebec](#) (Supreme Court of Canada, October 9, 1997); [Harper v. Canada \(Attorney General\)](#) (Supreme Court of Canada, November 10, 2000); [Harper v. Canada \(Attorney General\)](#) (Supreme Court of Canada, May 18, 2004), overturning [Harper v. Canada \(Attorney General\)](#) (Alberta Court of Appeal, December 16, 2002). *Commissioner of Canada Elections v. National Citizen's Coalition* (Ontario Court of Justice, October 14, 2003); [Pacific Press v. A.G. et al.](#) (British Columbia Supreme Court, February 9, 2000).

<sup>6</sup> [Sauvé v. Canada](#) (Supreme Court of Canada, May 27, 1993) [Sauvé v. Canada \(Chief Electoral Officer\)](#) (Supreme Court of Canada, October 31, 2002), see <http://www.sfu.ca/~aheard/elections/laws.html>

<sup>7</sup> See [Thomson Newspapers Co. v. Canada \(Attorney General\)](#) (Supreme Court of Canada, May 29, 1998)

<sup>8</sup> Each broadcaster must make available up to 390 minutes for political parties to purchase for advertising during the election campaign. See <http://www.sfu.ca/~aheard/elections/laws.html> for details..

<sup>11</sup> Colin A. Hughes. 'Fair and Equal Districts – The Problem at the State Level,' unpublished paper, *Third Federalism Project Conference*, Australian National University, 1983, p 9.