

[YOUR NAME]
[YOUR ADDRESS]

The Honourable Sean Fraser
Minister of Justice and Attorney General of Canada
284 Wellington Street
Ottawa, Ontario K1A 0H8

Dear Minister Fraser,

I am writing as a Canadian father and survivor of coercive control who has been wrongfully separated from my child. I strongly support protecting children from family violence. However, I am deeply concerned that Bill C-223, the "Keeping Children Safe Act," uses a reassuring, U.S.-style title that risks glossing over very real harms it could cause to children's relationships with safe, loving parents.

C-223 lacks crucial safeguards around coercive control and risks normalizing alienating behaviours that are well-documented as harmful to children. While I understand the concern about misusing "parental alienation" as a label against protective parents, **it is equally concerning that real and harmful alienating behaviours are often ignored and not fully investigated.** Justice Canada's explanation of the Divorce Act confirms that courts must consider "each spouse's willingness to support the development and maintenance of the child's relationship with the other spouse" as part of the best-interests test. Section 16(3)(c) codifies this "friendly parent" factor. International and Canadian commentary recognize that chronic denigration, interference with contact, and pressuring a child to reject a parent damage children's emotional development, regardless of terminology used. **Erasing the phrase "parental alienation" must not erase the underlying behaviours.** The law must still equip courts to identify and remedy alienating conduct, regardless of which parent engages in it.

False or exaggerated claims of both parental alienation and domestic abuse are frequently weaponized in court. **The answer is not a gendered bill that elevates one set of buzzwords over another, but an improved justice system with the training, time, and tools to cut through labels and assess evidence.** A truly child-centred approach requires judges to ask what is actually happening to this child, in this family, with these parents.

Several specific provisions of C-223 risk further victimizing survivors. The bill bars courts from considering allegations that one parent manipulated a child to resist contact unless there is proof of deliberate, repeated interference *and* family violence—and even then, the evidence cannot support an "alienation" allegation. This

ties judges' hands where there is clear undermining but no documented physical violence, inviting coercive controllers to operate in that grey zone. C-223 prohibits courts from ordering reunification therapy or adjusting parenting time to repair a damaged relationship with a safe parent. By treating the new s.16(3.1) rule as a "change in circumstances," the bill invites alienating parents to relitigate past cases and overturn protections. **These changes risk further victimizing survivors by restricting courts' ability to see, name, and remedy coercive control that operates through the child.**

In my experience, most Canadians believe shared parenting is the default and are deeply troubled to discover one parent can withhold access without consequence. They see this as fundamentally unjust because children need relationships with both safe parents. **Bill C-223 risks entrenching the opposite: a framework where withholding and alienating behaviours are harder to name, prove, or remedy.**

We already have a better model. Bill C-78 modernized the Divorce Act by requiring courts to consider both family violence and each parent's willingness to support the child's relationship with the other parent, preserving the friendly-parent factor subject to safety concerns. Ontario's Moving Ontario Family Law Forward Act similarly balanced these principles. C-223 should build on this approach rather than tilting toward one narrative that renders another class of victims and children invisible.

The gendered framing of this bill is especially troubling. Public communication highlights almost exclusively women's organizations. Yet Justice Canada and the Federal Ombudsperson acknowledge that men experience intimate partner violence in significant numbers and struggle to be recognized as victims. The Ombudsperson's 2024 report states "one in five incidents of police-reported IPV involved a male victim" and that men account for 20% of intimate-partner homicide victims. Male survivors are less likely to report and often face being treated as aggressors, so the actual numbers are likely much higher. Research on fathers' mental health shows elevated distress and suicidal ideation among those separated from children. When we design law as if only mothers can be credible victims, we leave these men—and their children—largely invisible.

It is crucial that C-223 reflect how coercive control appears in court. Justice Canada describes coercive control as patterns including isolation, monitoring, and psychological abuse—harder to identify than physical violence. Trauma research shows survivors present with depression, anxiety, panic, and emotional dysregulation—predictable consequences of entrapment. **These symptoms are then weaponized by abusers to paint victims as "unstable," when they are predictable responses to extreme stress.**

I respectfully urge you to:

Mandate coercive control training for judges, lawyers, mediators, assessors, and child-protection professionals that explicitly addresses how trauma presents in victims; how apparent "volatility" or "reactive abuse" can be weaponized in court; and how controlling parents manipulate narratives and systems to erase the other parent.

Retain shared parenting as the default starting point where there is no documented, substantiated abuse, with restrictions on parenting time imposed only after careful, evidence-based screening for coercive control and family violence by the parent currently in de facto control of the children. Justice Canada's "Divorce Act Changes Explained" materials emphasize that children generally benefit from meaningful relationships with both parents, and that the friendly-parent factor exists to reflect that reality while still allowing safety concerns to override it where necessary.

Avoid categorical dismissals of "parental alienation" and instead distinguish between pseudoscientific uses of the term and the well-documented set of behaviours—chronic denigration, interference with contact, emotional manipulation of the child—that our existing best-interests framework already contemplates as harmful. As Justice Canada notes, the courts' consideration of each parent's willingness to support the child's relationship with the other parent is meant precisely to capture these dynamics.

Include male survivors and alienated fathers, alongside women and mothers, in the consultation and expert-testimony process, so the law reflects the full reality of family violence in Canada.

Include experts on personality disorders such as NPD and HPD and coercive control to demonstrate how these patterns manifest, and how the victim is often portrayed as the abuser.

If time permits, I would invite you or your staff to spend even ten minutes browsing public support groups focused on "parental alienation" on Facebook and similar platforms. You will find stories from both loving mothers and fathers describing the same core pattern: a safe, caring parent slowly erased from a child's life through manipulation, false narratives, and systems that cannot see beyond stereotypes. The pain and trauma evident in these accounts—from parents of all genders who have been wrongfully separated from their children—echo what the empirical literature and Justice Canada's own Divorce Act materials already tell us: that children are harmed when their relationship with a safe parent is undermined, regardless of which parent is doing the undermining.

A title like "Keeping Children Safe Act" should not obscure that, without balanced safeguards, the bill could keep children physically close to one parent while severing

their relationship with the other, even where that parent is safe. I am deeply sympathetic to abused women. Women and children unquestionably deserve protection—that is non-negotiable. It is unquestionable that abusers sometimes weaponize "parental alienation" language. **It is equally true that a substantial minority of domestic violence victims are men, and that children are harmed when safe fathers are erased through unrecognized coercive control.**

This bill represents the exact opposite of what is needed. The courts' problem is not too much language—it is too little insight into abuse patterns. Rather than stripping away words that expose truth, we need a collaborative, evidence-based approach that helps courts see and remedy harm, regardless of which parent inflicts it. **We are all fighting for the same thing: truth and justice.** A truly child-centred reform protects children's relationships with both safe parents and equips courts to find the truth, without presuming which parent fits which role.

I ask you to ensure Bill C-223 emerges from committee with explicit safeguards to identify coercive control from either parent and prevent its use as a tool of relational erasure.

Sincerely,