

The Architecture of Municipal Policy Capture: Analyzing the CAM Municipal Antisemitism Action Index in London, Sydney, and Toronto

1. Introduction and Theoretical Framework

The regulatory architecture governing civil rights, freedom of expression, and public assembly in Western democracies has traditionally been anchored by supreme national frameworks. Instruments such as the First Amendment to the United States Constitution, the Canadian Charter of Rights and Freedoms, and the United Kingdom's Human Rights Act establish rigid, high-threshold protections for political speech and peaceful protest. Due to the inherent difficulty of altering these foundational documents or passing national legislation that explicitly restricts political expression, international advocacy networks and state-aligned lobbying apparatuses have executed a profound strategic pivot. The contemporary frontier for the enforcement of viewpoint-specific behavioral codes is no longer the national legislature; it is the municipality. This phenomenon can be classified as "municipal policy capture" achieved through "contractual localism". By recognizing that local city councils, mayoral offices, and regional administrative boards possess vast, largely discretionary authority over zoning ordinances, public procurement contracts, and localized police training, advocacy groups seek to bypass national constitutional gridlock. When a restriction on political assembly is framed as a local public nuisance issue (zoning), or when an ideological litmus test is framed as an anti-discrimination vendor requirement (procurement), the legal paradigm shifts. It ceases to be a constitutional dispute over free expression and becomes an administrative dispute over localized code compliance. At the vanguard of this geopolitical shift is the Combat Antisemitism Movement (CAM) and its primary policy blueprint: the "Municipal Antisemitism Action Index". Launched as a comprehensive framework to rank, classify, and guide local governments, the Index operates as a highly sophisticated extra-legislative mechanism designed to embed the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism into the administrative machinery of cities across the globe.

This comprehensive research report maps the execution of this municipal policy capture strategy across three primary Commonwealth domains: London, Sydney, and Toronto. By exhaustively investigating the integration of the CAM Municipal Antisemitism Action Index into local zoning codes (via protest "bubble zones"), public procurement rules (via anti-boycott mandates), and police training manuals (via the reclassification of political speech as bias incidents), this analysis demonstrates how local administrative apparatuses are being leveraged to outflank and neutralize national free-speech protections.

2. The Combat Antisemitism Movement (CAM) and the Apparatus of Influence

To comprehend the mechanics of the Municipal Antisemitism Action Index, it is first necessary to deconstruct the organization responsible for its proliferation. The Combat Antisemitism Movement operates as a decentralized, public-private operational ecosystem that utilizes venture philanthropy and strategic force-multiplication to secure municipal policy alignment with the State of Israel.

2.1 Origins, State Linkages, and the FARA Evasion Strategy

The structural origins of CAM are deeply entwined with international intelligence and strategic affairs operations. The organization was founded in 2019 by Adam Beren, a prominent donor who maintained close ties to the Donald Trump administration. However, the operational doctrine of the organization traces back to the Israeli Ministry of Strategic Affairs. In 2017, the Ministry established a private-public partnership originally named "Kela Shlomo" (Solomon's Sling), later rebranded as "Concert" and "Voices of Israel," with the explicit mandate to execute offensive information operations against the global Boycott, Divestment, and Sanctions (BDS) movement.

Internal documents and legal memoranda originating from the Israeli Justice Ministry reveal that Israeli officials were acutely concerned that their direct funding and direction of advocacy campaigns in the United States and allied nations would trigger the Foreign Agents Registration Act (FARA) or analogous foreign interference laws in other jurisdictions. FARA compliance requires groups acting on behalf of a foreign government to register with national authorities, attach disclaimers to their distributed materials, and submit to rigorous financial transparency. To evade this scrutiny, the Ministry's legal advisers recommended utilizing American and international third-party nonprofit intermediaries. CAM emerged as a primary node in this network. The organization's leadership reflects this integration: CAM's CEO, Sacha Roytman Dratwa, formerly commanded the Israel Defense Forces' (IDF) Digital Media Unit, while CAM's Advisory Board includes Brig. Gen. Sima Vaknin-Gill, the former Chief Military Censor for Israel and a key architect of the Kela Shlomo project. Revital Yakin Krakovsky, a Senior Advisor at CAM, previously served as the Executive Director for Strategy and Communications at the Ministry of Strategic Affairs. This lineage underscores that CAM is not merely a grassroots civil rights organization, but a sophisticated, state-aligned apparatus engineered to project foreign policy objectives into domestic municipal environments.

2.2 The Architecture of the Municipal Antisemitism Action Index

The central mechanism through which CAM exerts this influence is the Municipal Antisemitism Action Index. The Index evaluates, ranks, and classifies municipalities based on their adoption of highly specific policy recommendations. By packaging these directives as a "toolkit" for local mayors, CAM effectively provides municipalities with plug-and-play legislation, circumventing the need for local officials to draft original policy or debate the constitutional implications of such measures.

The Index assesses municipal performance across four primary categories, each designed to capture a different element of local governance.

Index Category	Primary Objective	Key Policy Mechanisms Recommended
Legislation and Policy	Codify viewpoint-specific speech constraints into	Adoption of the IHRA definition; implementation of "Bubble

Index Category	Primary Objective	Key Policy Mechanisms Recommended
	municipal law.	Zone" protest restrictions near sensitive areas; enactment of municipal Anti-Masking laws to prevent anonymous assembly; adoption of mandatory Anti-BDS public procurement policies.
Education and Awareness	Embed ideological compliance into municipal school districts and civic events.	Mandating Jewish American/Canadian Heritage Month commemorations; disciplining local educators who violate IHRA standards in their off-duty speech or curricula.
Community Engagement	Align local civil society and interfaith groups with the CAM operational framework.	Establishing Sister City relationships with Israeli municipalities; forming municipal Antisemitism Task Forces composed of law enforcement and vetted community leaders.
Law Enforcement & Judicial Action	Reclassify political expression as criminal bias through altered investigative training.	Mandating annual IHRA-based police training; establishing localized incident reporting databases that feed into private networks like CAM's Antisemitism Research Center; elevating hate crime penalties.

3. The United States Prototype: Federal Pressure and Local Ingestion

The execution of the CAM Index in Commonwealth nations (London, Sydney, Toronto) cannot be fully analyzed without first mapping its prototype in the United States, where the "pincer" strategy was developed and refined.

The U.S. model operates through a coordinated top-down and bottom-up pressure system. At the federal level, the Department of Justice's Anti-Semitism Advisory Committee (ASAC), utilizing Title VI "hostile environment" standards, threatens municipalities and public universities with the revocation of federal grants if they fail to suppress anti-Zionist speech. Concurrently, CAM orchestrates the "bottom-up" integration via its Mayors Advisory Board, chaired by Providence Mayor Brett Smiley, which lobbies local executives to adopt the Municipal Index voluntarily.

This strategy is augmented by advanced digital infrastructure designed to automate the volume of civil rights complaints. Incubators like the Adir Challenge Foundation have funded "Reportify," a generative AI application that structures raw campus incident reports into highly formalized Title VI legal complaints, while "CyberWell" uses machine learning to flag social media content

violating the IHRA definition, sharing this data with organizations like the American Jewish Committee (AJC) for rapid enforcement.

The U.S. municipal capture network operates across three primary corridors, serving as the blueprint for international expansion :

U.S. Regional Node	Key Municipal Leaders	Strategic Implementation
Southern California Corridor	Mayor Sharon Nazarian (Beverly Hills), Mayor Patricia Lock Dawson (Riverside)	Hosted the CAM Mayors Summit; integrated IHRA into local college policing in response to DOJ interventions.
Florida Gold Coast Network	Mayor Steven Meiner (Miami Beach), Mayor Alix Desulme (North Miami), Mayor Larisa Svechin (Sunny Isles)	Executed strict Anti-BDS ordinances (Miami Beach); fully integrated the CAM Index into zoning and local procurement, backed by regional developers.
Atlanta Suburban Ring	Mayor Rusty Paul (Sandy Springs), Mayor Vince Williams (Union City)	Hosted closed-door Mayors Roundtables to inject the CAM Index into suburban public safety codes and K-12 school board rules.

This highly regimented U.S. ecosystem—blending federal Title VI threats, AI-driven complaint generation, and coordinated mayoral adoption of the CAM Index—represents the operational template currently being exported to the municipal councils of Toronto, Sydney, and London.

4. Integration Mechanism I: Zoning Codes and Protest "Bubble Zones"

The first major vector of municipal policy capture directed by the CAM Index falls under the "Legislation and Policy" pillar, specifically the mandate for "Bubble Zone Legislation". This policy requires local city councils to adopt ordinances exercising time, place, and manner restrictions that categorically prohibit public protests and demonstrations within a set proximity to sensitive areas, explicitly defining houses of worship (synagogues) and religious schools as protected domains.

4.1 Toronto and the Re-Engineering of Access Laws

The application of municipal zoning by-laws to restrict political assembly has triggered severe democratic friction in the Greater Toronto Area (GTA). Throughout early 2024, a wave of pro-Palestinian demonstrations was organized outside various synagogues in the Toronto suburbs, notably in Thornhill and Vaughan. Municipal officials and aligned advocacy groups immediately categorized these protests as acts of antisemitic intimidation targeting vulnerable religious institutions. Conversely, the demonstration organizers articulated that the protests were strictly political, aimed at international real estate exhibitions hosted inside the synagogues, which were allegedly facilitating the sale of land located within contested and illegal Israeli settlements.

Because the Canadian Charter of Rights and Freedoms vigorously protects the right to peaceful political assembly, and because national hate-crime statutes require a high evidentiary burden

of malicious intent, local officials opted to bypass the federal constitutional framework entirely. They pivoted to local zoning and public nuisance by-laws.

The legal theory utilized by the municipalities was directly imported from provincial statutes originally drafted to protect abortion clinics. In provinces like British Columbia and Ontario, *Safe Access to Abortion Services Acts* established mandatory buffer zones to shield patients from harassment, a measure validated by the courts on the premise of protecting a "captive audience" seeking essential medical care. Advocacy groups, guided by frameworks analogous to the CAM Index, successfully lobbied GTA municipalities to transfer this "captive audience" legal theory to religious congregations.

The result was a cascade of aggressive municipal zoning restrictions. The City of Vaughan and the City of Brampton rapidly enacted by-laws prohibiting any protests within 100 meters of places of worship. The penalties attached to these localized by-laws are extraordinarily severe, far exceeding standard municipal fines; in Brampton, individuals violating the 100-meter bubble zone face maximum fines of up to \$100,000.

4.2 The Toronto City Council Debate and CIJA Lobbying

Following the suburban precedents, the Toronto City Council initiated a highly polarized legislative process to codify its own "Demonstrations Bylaw to Protect Vulnerable Institutions". Toronto city staff initially recommended a 20-meter bubble zone around places of worship, daycares, and schools, enforced by police and by-law officers with maximum fines capped at \$5,000.

However, the Centre for Israel and Jewish Affairs (CIJA), a prominent advocacy group operating in alignment with the broader objectives of the CAM framework, aggressively lobbied the Toronto City Council to reject the 20-meter limit. CIJA publicly demanded the adoption of Vaughan's 100-meter standard, arguing that 20 meters provided merely a fraction of the necessary security. Furthermore, CIJA criticized the bureaucratic mechanism of the proposed Toronto by-law, which required individual institutions to petition the city to establish a specific "access zone," demanding instead a blanket, automatic ban on protests near these facilities. The structural flaw in this municipal adaptation, as highlighted by civil liberties advocates, is the dual-use nature of modern religious institutions. While abortion clinics provide a singular, constitutionally protected service, synagogues, churches, and mosques frequently operate as multipurpose community centers. They host political town halls, international real estate expos, and commercial events. By imposing a 100-meter municipal protest ban, city councils inadvertently grant absolute immunity from public demonstration to any commercial or political entity operating within the walls of a religious building, effectively weaponizing zoning law to extinguish political dissent.

4.3 Comparative Zoning Context: New York

The Toronto paradigm mirrors concurrent developments in the United States. In New York, the push for bubble zones created significant conflict between local and state authorities. New York State Governor Kathy Hochul proposed legislation to establish mandatory 25-foot buffer zones around houses of worship. Simultaneously, the New York City Council navigated intense negotiations over Intro 1-B. Mayor Zohran Mamdani initially vetoed broader buffer zone measures regarding schools due to free speech concerns but permitted narrower requirements directing the New York Police Department (NYPD) to formalize specific obstruction prevention plans outside synagogues. These transatlantic parallels highlight the systematic nature of the

CAM Index's recommendation to utilize municipal proximity restrictions as a tool for protest management.

5. Integration Mechanism II: Public Procurement Rules and Anti-BDS Enforcement

The second primary vector of municipal policy capture dictated by the CAM Index targets public finance and contracting. The Index's model "Anti-BDS Policy" requires municipalities to adopt binding resolutions affirming they will not conduct business, award contracts, or invest municipal funds with any corporate entity that participates in boycotts, divestments, or sanctions against the State of Israel. This strategy leverages the massive economic weight of local governments to enforce geopolitical compliance.

5.1 London and the UK Local Authority Network: The Legislative Vacuum

In the United Kingdom, the conflict over municipal procurement has been defined by a profound jurisdictional war between the Conservative national government and independent local councils. Recognizing that numerous UK local authorities were utilizing their extensive procurement budgets and Local Government Pension Schemes (LGPS) to enact ethical boycotts—often targeting firms involved in the Israeli occupation or other international human rights violations—the national government attempted a top-down legislative override.

The *Economic Activity of Public Bodies (Overseas Matters) Bill* was introduced into the House of Commons in June 2023. Championed by figures such as Michael Gove and Robert Jenrick at the Department for Levelling Up, Housing and Communities (DLUHC), the bill aimed to legally prohibit public bodies from being influenced by political or moral disapproval of foreign states when making procurement and investment decisions. The bill was explicitly designed to eradicate the BDS movement from local government, granting the government power to exempt certain nations (like Russia and Belarus) from the boycott ban, while expressly forbidding local councils from boycotting Israel or the Occupied Palestinian Territories.

The bill targeted the heart of municipal finance: the LGPS. In England and Wales, the LGPS is divided into 86 separate funds managed by administering authorities (local councils) and pooled into massive investment vehicles like the Brunel Pension Partnership and the London LGPS CIV Ltd. The bill sought to empower The Pensions Regulator (TPR) to aggressively enforce compliance and issue massive monetary penalties to councils that attempted to divest from Israel.

However, this sweeping national legislation ultimately collapsed. Following the announcement of a general election, the prorogation of Parliament in May 2024 resulted in the bill being abandoned. This legislative failure at the national level drastically amplified the importance of the CAM municipal capture strategy. Without a national mandate, pro-Israel advocacy organizations were forced to pivot to intensive, council-by-council lobbying to voluntarily enforce Anti-BDS codes.

The Board of Deputies of British Jews leads this localized charge through its "Jewish Manifesto for Local Government," which explicitly instructs local councilors to adopt the IHRA definition into all procurement and operational procedures. Advocacy networks aggressively utilize Freedom of Information (FOI) requests to map which specific District Boroughs and County

Councils have complied, utilizing public exposure to pressure holdout municipalities into adopting the CAM Index's Anti-BDS parameters.

5.2 Sydney City Council and the Push for Local Control

The critical strategic value of municipal procurement is highly visible in Sydney, Australia, where local councils have demonstrated a willingness to utilize their financial leverage in direct opposition to the CAM framework.

Rather than adopting Anti-BDS ordinances, the City of Sydney Council—led by the Greens and Lord Mayor Clover Moore—passed a comprehensive motion directing its Chief Executive Officer to ensure the city does not purchase from or fund companies complicit in human rights abuses or Israeli settlements. The council mandated a full audit of all municipal investments and supplier contracts against the United Nations database of companies involved in illegal settlements.

This progressive approach is part of a broader trend in Australian municipal governance, championed by organizations like Social Traders, which encourage local councils to adopt "social procurement policies" that align city spending with ethical and human rights outcomes. The existence of councils willing to enact BDS policies represents an existential threat to the objectives of the CAM organization. Consequently, CAM and its financial backers directed massive resources toward Australia to arrest this trend, utilizing luxury Mayoral Summits to lobby rival mayors and councilors to legally redefine BDS as an inherently antisemitic act through the adoption of the IHRA definition. If BDS can be classified as antisemitic discrimination under local law, local procurement officers are legally compelled to disqualify BDS-compliant firms under standard municipal equal opportunity and anti-racism clauses, completely neutralizing the political will of councils like Sydney.

5.3 Toronto: Boycott Pressures and Supply Chain Management

In the Canadian context, municipal procurement remains a highly contested battlefield. Toronto and surrounding municipalities face sustained lobbying from activist networks demanding the cancellation of procurement contracts with defense contractors, such as Elbit Systems, and urging the prohibition of municipal port access for entities like ZIM shipping. While the Ontario provincial legislature previously passed symbolic, non-binding motions rejecting BDS, the objective of the CAM Index is to transcend symbolism and hardwire these rejections into binding municipal contracts. By enforcing the Anti-BDS framework at the municipal level, advocates ensure that any private entity—whether a tech provider, waste management firm, or construction contractor—must sign a binding pledge refusing to participate in BDS in order to bid on public infrastructure projects in the Greater Toronto Area.

6. Integration Mechanism III: Police Training Manuals and the Privatization of Law Enforcement

The third, and arguably most consequential, vector of the CAM Municipal Antisemitism Action Index targets the coercive arm of the state: local law enforcement. The Index mandates that municipalities comprehensively integrate the IHRA Working Definition of Antisemitism into annual police training programs, incident reporting systems, and prosecutorial guidelines. By successfully altering police training modules, municipal leaders can effectively redefine the

boundaries of legal speech without the necessity of passing new, constitutionally vulnerable national legislation.

6.1 The IHRA Framework as an Investigative Tool

The IHRA Working Definition of Antisemitism is the core ideological engine driving this police reform. While its foundational definition describes antisemitism as a certain perception of Jews expressed as hatred, its true regulatory power lies in its 11 "contemporary examples". These examples explicitly state that antisemitism includes, among other things:

- Denying the Jewish people their right to self-determination (e.g., claiming the State of Israel is a racist endeavor).
- Applying double standards by requiring of Israel a behavior not expected of any other democratic nation.
- Drawing comparisons of contemporary Israeli policy to that of the Nazis.
- Holding Jews collectively responsible for actions of the state of Israel.

Under standard national legal frameworks, utilizing a Nazi comparison in a political protest, labeling a state a "racist endeavor," or applying rhetorical double standards to a foreign nation are universally protected as free political expression. However, once local police are trained to view these specific actions through the lens of the IHRA definition, officers are instructed to log these political slogans, protest banners, and boycott campaigns as criminal bias incidents or potential hate crimes.

6.2 Toronto: The Privatization of Police Training

The integration of the IHRA definition into local law enforcement is highly advanced in Toronto, representing a textbook manifestation of an "administrative ingestion loop"—a process where private advocacy groups draft the operational standards utilized by state coercive authorities. In response to rising geopolitical tensions, the Toronto Police Service (TPS) entered into a multifaceted, formalized partnership with the Friends of Simon Wiesenthal Center for Holocaust Studies (FSWC), a private advocacy NGO. The FSWC directly provides antisemitism awareness and competency training to Toronto law enforcement officers, utilizing the IHRA definition to guide police on identifying the "nuanced and contextual nature" of modern antisemitism, specifically relying on the IHRA's illustrative examples regarding the State of Israel.

This integration is not restricted to municipal patrol officers; it extends to the highest echelons of the judicial system. In Ontario, approximately 700 Crown prosecutors received specialized antisemitism training delivered directly by the FSWC, intended to complement their standard hate crime modules. Concurrently, the Toronto Police Services Board formally requested that the Chief of Police review all TPS training to ensure strict alignment with the Canadian Handbook on the IHRA definition, explicitly mandating ongoing consultation with private advocacy organizations such as CIJA and FSWC.

The result is a fundamentally altered law enforcement matrix. Advocacy groups pushing this training argue that standard police officers lack the geopolitical tools to properly identify hate motivations embedded in complex protests. Consequently, by applying the privately administered IHRA training, a local Toronto police officer responding to a university encampment or a demonstration outside a consulate is administratively conditioned to interpret anti-Zionist rhetoric not as protected speech, but as criminal bias indicators. This data is subsequently fed into municipal crime statistics, which are then weaponized to justify further

municipal zoning restrictions and federal interventions.

6.3 London: Disciplinary Action and Internal Employment Law

In the United Kingdom, the integration of the IHRA definition into policing is deeply entrenched. All UK police forces, encompassing the Metropolitan Police Service (Met) and the City of London Police, formally recognize and utilize the 2016 IHRA working definition to identify and process antisemitic hate crimes.

Crucially, the application of this definition in London extends far beyond the policing of public protests; it has been integrated directly into municipal employment law and disciplinary HR procedures. The IHRA definition is actively weaponized as a human resources mechanism to police the off-duty political speech of municipal employees.

This dynamic was highly publicized when a detective sergeant with the London Metropolitan Police was dismissed following a formal misconduct panel ruling. The officer had utilized social media to share posts drawing comparisons between the military conflict in Gaza and Nazi concentration camps. Under the IHRA's illustrative examples, which explicitly classify drawing comparisons between contemporary Israeli policy and the Nazis as antisemitic, the panel determined the posts constituted Holocaust distortion and immediately terminated his employment.

This case perfectly illuminates the immense power of municipal administrative capture. Without a single court ruling redefining the limits of national free speech, internal police administrative boards and local council human resources departments successfully enforce strict viewpoint constraints by citing municipally adopted IHRA guidelines.

The Greater London Authority (GLA) enforces this same framework upon its politicians. The Code of Conduct for Members, applicable to the Mayor of London and all 25 London Assembly Members, defines harassment and unacceptable behavior through the lens of the Equalities Act, augmented by the Assembly's formal adoption of the IHRA standard. Consequently, any London politician expressing views that run afoul of the IHRA's examples regarding Israel risks formal sanction, censure, or removal from municipal committees under the guise of an internal HR violation, bypassing the democratic debate entirely.

7. Case Study: The Australian Mayoral Summits as a Masterclass in Municipal Capture

To observe the CAM Municipal Antisemitism Action Index deployed as a real-time, highly capitalized influence operation, one must examine the ongoing strategies targeting Australia. Recognizing that progressive councils (like Sydney City Council) posed a threat to the global Anti-BDS consensus, CAM directed massive resources to capture Australian municipal governance.

7.1 The Gold Coast Summit and Venture Philanthropy

In September 2025, CAM organized the inaugural Australian Mayors Summit Against Antisemitism on the Gold Coast, chaired by Gold Coast Mayor Tom Tate and heavily supported by figures such as corporate lawyer David Gonski and Stanley Roth.

The summit was executed as a masterclass in lobbying via luxury hospitality. It was marketed to local government councilors across Australia as an "all-expenses-paid" luxury junket, offering

airfare, accommodation, and substantial networking opportunities. More than 250 local leaders, representing nearly 100 municipal councils from urban, regional, and remote Australia, attended.

The primary, explicit agenda of the summit was the rapid localized adoption of the IHRA definition and the widespread rollout of the CAM Municipal Antisemitism Action Index. The strategic logic is highly effective: overwhelm local municipal officials—individuals who typically dedicate their tenures to managing waste collection, local zoning disputes, and infrastructure maintenance—with high-level geopolitical lobbying, luxury hospitality, and ready-made, easily implementable policy blueprints.

This aggressive approach generated significant ethical and political friction. The Australian Services Union (ASU), which had previously passed motions supporting Palestine and the BDS campaign, launched initiatives urging local officials to boycott the summit, citing CAM's opaque funding and connections to foreign military entities. Experienced councilors raised serious ethical red flags regarding the acceptance of substantial gifts that could inevitably influence local public policy decisions. Consequently, several councils in Sydney's affluent North Shore, including Mosman, Ryde, and North Sydney, officially boycotted the event.

7.2 Waverley Council and the "Model Antisemitism Strategy"

Despite the ethical boycotts, the CAM strategy successfully captured high-value municipal targets. The Waverley Council, an eastern suburb of Sydney that encompasses Bondi Beach and houses a substantial Jewish population (approximately 16% of residents), emerged as the vanguard for CAM's municipal strategy in Australia.

Led by Mayor Will Nemesh, Waverley became the first local government in Australia to formally adopt a dedicated "Strategy to Combat Antisemitism". The Waverley "Model Antisemitism Strategy" perfectly encapsulates the core tenets of the CAM Index. It requires the full adoption of the IHRA definition, implements mandates for all Waverley Councilors to complete compulsory awareness training at the Sydney Jewish Museum, and aligns local community grants and youth programs with these new compliance metrics.

Demonstrating the transnational nature of this network, CAM immediately elevated Waverley as a global success story. Mayor Nemesh was invited to present the Waverley model on the international stage at the CAM-organized European Mayors Summit Against Antisemitism in Paris, offering the Australian suburb as a scalable proof-of-concept for how local councils worldwide can bypass national debates and unilaterally implement targeted speech and behavioral codes.

7.3 The 2026 Bondi Summit and the "Sydney Declaration"

Seeking to capitalize on the Waverley precedent and cement permanent municipal capture, CAM and its Australian partners scheduled the "2026 Local Government Summit on Antisemitism and Social Cohesion". Slated for November 2026, the summit is co-hosted by the Waverley Council in Bondi, strategically timed to coincide with the anniversary of a tragic local terror incident to maximize emotional and political leverage.

The explicit objective of the Bondi summit is the formal adoption of the "Sydney Declaration". This document is designed as a collective local government commitment intended to bind Australian cities to the CAM operational frameworks, thereby creating a unified municipal bloc capable of dictating policy upwards to state and federal entities. The summit intends to leverage the influence of Australia's Special Envoy to Combat Antisemitism (ASECA), Jillian Segal,

whose proposed national action plan heavily mirrors CAM's agenda, advocating for the defunding of public institutions and the deregistration of charities that violate IHRA standards. This unprecedented mobilization of municipal power has met fierce resistance from domestic civil society. A coalition of Jewish organizations, including the Jewish Council of Australia and the Australian Jewish Democratic Society, released an open letter urging the Australian Government to wholly reject the ASECA plan and the adoption of the IHRA definition. The coalition warned that these frameworks conflate antisemitism with legitimate criticism of the State of Israel, threaten freedom of political speech, and represent an undemocratic, punitive framework that bypasses fundamental human rights protections.

8. Comparative Analysis: The Matrix of Municipal Capture

To comprehensively understand the operational realities of the CAM Municipal Antisemitism Action Index across the Commonwealth, it is necessary to structurally compare the specific vectors of policy capture utilized in London, Sydney, and Toronto.

Policy Capture Vector	London (Greater London Authority & UK Councils)	Sydney (Waverley Council & Sydney City Council)	Toronto (Toronto City Council & GTA Municipalities)
Zoning & "Bubble Zones"	Utilizes existing anti-social behavior laws and public nuisance orders to aggressively restrict targeted residential protests and door-to-door advocacy campaigns.	Protest management is heavily integrated into the Waverley Model Antisemitism Strategy; focus remains on forcing councils to partner with police to monitor and restrict designated public assemblies.	Aggressive deployment of localized by-laws. Suburban municipalities (Vaughan, Brampton) enacted draconian 100m buffer zones with \$100,000 fines; Toronto Council bitterly debated 20m vs 100m zones.
Public Procurement & Anti-BDS	National ban on BDS completely failed. Strategy shifted to intense, council-by-council lobbying to embed IHRA into massive Local Government Pension Schemes (LGPS) and supplier contracts.	Highly contested environment. Sydney City Council actively passed pro-BDS audit resolutions. CAM relies on luxury Mayoral Summits to reverse this trend via the binding "Sydney Declaration".	Advocacy groups actively lobby to embed anti-boycott clauses into municipal procurement, seeking to counter local activist movements demanding the exclusion of specific defense (Elbit) and logistics (ZIM) firms from city contracts.
Law Enforcement & Civil Service	Fully integrated. Met Police and City of London Police universally utilize IHRA. IHRA is actively weaponized by	Waverley Council mandates IHRA awareness training for all local councilors. The CAM strategy seeks to formalize police and	Deeply embedded via private NGO partnerships. The FSWC actively trains the Toronto Police Service and 700

Policy Capture Vector	London (Greater London Authority & UK Councils)	Sydney (Waverley Council & Sydney City Council)	Toronto (Toronto City Council & GTA Municipalities)
	misconduct panels to terminate officers for political social media posts.	council data sharing on bias incidents across New South Wales.	provincial Crown prosecutors on IHRA application, successfully outsourcing the formulation of speech definitions.

9. Second and Third-Order Implications for Democratic Governance

The successful implementation of the CAM Municipal Antisemitism Action Index and similar localized frameworks carries profound second and third-order implications for the future of democratic governance, the rule of law, and the administration of civil liberties.

9.1 The Privatization of Speech Regulation and Algorithmic Enforcement

First, this strategy represents the total privatization of speech regulation. By incentivizing and pressuring municipalities to adopt legal definitions, training modules, and strategic frameworks drafted by private advocacy networks (such as CAM, CIJA, or FSWC), the state abdicates its fundamental role as the neutral, democratic arbiter of civil liberties. When a Toronto police officer responds to a complex geopolitical protest utilizing a framework provided by a private NGO, or when a London misconduct panel fires a detective based on an internationally drafted, non-legally binding working definition, the boundary between public law and private political objectives dissolves.

This privatization is increasingly automated. The integration of artificial intelligence tools like "Reportify" and "CyberWell" into this ecosystem means that the generation of civil rights complaints and the monitoring of political speech are occurring at an algorithmic scale, overwhelming the capacity of local administrators to objectively review incidents. The resulting "administrative ingestion loop" ensures that civil liberties are regulated not by elected national legislatures or constitutional courts, but by unaccountable private data networks and low-level municipal bureaucrats.

9.2 Fragmented Civil Liberties and Jurisdiction Shopping

Second, the reliance on zoning, procurement, and local by-laws creates a radically fragmented landscape of civil rights. In a functional, cohesive democracy, fundamental rights such as free speech, peaceful assembly, and equal opportunity in contracting are expected to be uniform across the nation. The municipal capture strategy intentionally fractures this uniformity. A political protest that is perfectly legal in downtown Toronto might instantly trigger a catastrophic \$100,000 fine if the march crosses the municipal border into Brampton or Vaughan and inadvertently enters a 100-meter "bubble zone". A technology firm operating freely in one part of Sydney may suddenly find itself blacklisted from bidding on municipal waste

management or software contracts in a neighboring council that has adopted a strict Anti-BDS ordinance via the CAM Index.

This fractured environment actively encourages "jurisdiction shopping" by well-funded international advocacy groups. Organizations like CAM can target small, easily influenced municipal councils (such as Waverley in Australia or Miami Beach in the United States) to establish hard legal precedents that are subsequently utilized to pressure larger, more resistant jurisdictions into compliance.

9.3 The Subversion of Transparent Legislative Debate

Finally, the overarching doctrine of "contractual localism" actively subverts the democratic process. National debates over the limits of free speech, the legality of international boycotts, and the precise legal definition of hate crimes are inherently public, highly scrutinized by the media, and ultimately subject to rigorous constitutional review by supreme courts.

By contrast, the alteration of a local police training manual, the quiet insertion of a compliance clause into a municipal procurement contract, or the passage of a local zoning and noise ordinance are remarkably low-visibility administrative actions. Organizations like CAM deliberately exploit this opacity. By flying local mayors to luxury resorts on the Gold Coast or in Beverly Hills to secure private policy pledges, these networks implement sweeping, generation-defining changes to public policy entirely away from the scrutiny of the national press and the rigid constraints of constitutional law.

10. Conclusion

The empirical evidence derived from the operations in London, Sydney, and Toronto confirms beyond any reasonable doubt that a highly coordinated, internationally capitalized effort is underway to integrate the CAM Municipal Antisemitism Action Index—and its foundational IHRA framework—into the fundamental administrative machinery of local governments.

This phenomenon transcends symbolic local politics. It is a highly sophisticated, legally engineered strategy explicitly designed to bypass the constitutional and statutory protections of the national state. By weaponizing municipal zoning codes to create protest-free "bubble zones," manipulating public procurement rules to enforce economic and ideological blacklists, and outsourcing local police training to private ideological frameworks, local city councils are effectively rewriting the boundaries of civil liberties within their jurisdictions.

As the failure of the UK's national Anti-BDS bill and the intense localized jurisdictional battles in Sydney and Toronto vividly demonstrate, the modern geopolitical conflict over speech, assembly, and foreign policy is no longer being waged exclusively in federal parliaments or national supreme courts. It has deliberately relocated to the city hall, the local police board, and the municipal procurement office, transforming localized administrative codes into the primary enforcement matrices for global political compliance.

Works cited

1. Municipal Index - Combat Antisemitism Movement, <https://combatantisemitism.org/municipal-index/>
2. Municipal Antisemitism Action Index: Driving Change and ..., <https://mayors.combatantisemitism.org/hubfs/CAM%20Municipal%20Action%20Plan.pdf>
- 3.

MUNICIPAL ANTISEMITISM ACTION INDEX,

<https://mayors.combatantisemitism.org/hubfs/Municipal%20Action%20Index%20Appendix-1.pdf>

4. Point of Order. Antisemitism Summit raises ethics eyebrows ...,

<https://michaelwest.com.au/point-of-order-antisemitism-summit-raises-ethics-eyebrows/> 5.

Municipal Antisemitism Action Center, <https://combatantisemitism.org/municipal-action-center/> 6.

Bubble Zone Laws: Protecting communities or cracking down on pro- Palestine dissent? -

NationBuilder,

[https://assets.nationbuilder.com/cjpmefoundation/pages/1304/attachments/original/1747753319/](https://assets.nationbuilder.com/cjpmefoundation/pages/1304/attachments/original/1747753319/EN-_BUbble_zone_law.pdf?1747753319)

EN-_BUbble_zone_law.pdf?1747753319 7. NY could be getting 'buffer zones' to curb

synagogue protests. A Canadian bill highlights the pitfalls. - New York Jewish Week,

<https://www.jta.org/2026/01/13/politics/new-yorks-governor-is-introducing-a-bill-to-curb-synagog>

ue-protests-now-comes-the-hard-part 8. What's at Stake—Toronto's Proposed Bylaw on Safe

Access Zones - CIJA,

https://www.cija.ca/what_s_at_stake_toronto_s_proposed_bylaw_on_safe_access_zones 9.

City staff propose 20-metre protest 'bubble zone' for schools, daycares and places of worship |

CBC News,

<https://www.cbc.ca/news/canada/toronto/bubble-zone-toronto-places-of-worship-protests-1.7536>

757 10. Public Consultation for a Proposed Demonstrations Bylaw to Protect Vulnerable

Institutions City of Toronto Discovery and Summary Report May 12, 2025,

<https://www.toronto.ca/legdocs/mmis/2025/cc/bgrd/backgroundfile-255406.pdf> 11. Captive

Audiences and Bubble Zones | Centre for Free Expression,

<https://cfe.torontomu.ca/blog/2025/05/captive-audiences-and-bubble-zones> 12. Support for an

effective 'Bubble' Zone Municipal Bylaw to Protect Vulnerable Infrastructure.,

<https://pub-oakville.escribemeetings.com/filestream.ashx?DocumentId=85713> 13. Policy Brief:

IHRA and Defining Antisemitism - CIJA - The Centre for Israel and Jewish Affairs,

https://www.cija.ca/policy_brief_ihra_and_defining_antisemitism 14. Fact-checking a 152%

increase in hate crimes in New York City - PolitiFact,

<https://www.politifact.com/factchecks/2026/may/05/sam-sutton/hate-crimes-new-york-city-house>

s-worship/ 15. Zohran Mamdani vetoes NYC bill meant to protect schools from protests,

<https://www.jpost.com/diaspora/article-894193> 16. 'This Is What Responsible Municipal

Leadership Looks Like': New York City Council Approves Protest-Free Buffer Zones for Houses

of Worship | Combat Antisemitism Movement,

<https://combatantisemitism.org/government-and-policy/this-is-what-responsible-municipal-leader>

ship-looks-like-new-york-city-council-approves-buffer-zones-for-houses-of-worship/ 17. PSC

responds to Government's anti-BDS threat - Palestine Solidarity Campaign,

<https://palestinecampaign.org/psc-responds-to-governments-anti-bds-threat/> 18. Economic

Activity of Public Bodies (overseas matters) Bill, Second Reading, House of Lords, 20 February

2024 | Local Government Association,

<https://www.local.gov.uk/parliament/briefings-and-responses/economic-activity-public-bodies-ov>

erseas-matters-bill-second 19. Economic Activity of Public Bodies (Overseas Matters) Bill -

Parliament UK,

<https://publications.parliament.uk/pa/cm5803/cmpublic/EconomicActivityPublicBodies/memo/EA>

PBB29.htm 20. Economic Activity of Public Bodies (Overseas Matters) Bill 2022-23,

<https://commonslibrary.parliament.uk/research-briefings/cbp-9822/> 21. Human Rights Watch

Briefing - Economic Activity of Public Bodies (Overseas Matters) Bill,

<https://www.hrw.org/news/2023/07/03/human-rights-watch-briefing-economic-activity-public-bodi>

es-overseas-matters-bill 22. Boycotts bill must not undermine council pension funds | Local

Government Chronicle (LGC),

<https://www.lgcplus.com/politics/lgc-briefing/boycotts-bill-must-not-undermine-council-pension-funds-22-06-2023/> 23. General election 2024: Economic Activity of Public Bodies (Overseas Matters) Bill not proceeding | Practical Law, [https://uk.practicallaw.thomsonreuters.com/w-043-4580?transitionType=Default&contextData=\(sc.Default\)](https://uk.practicallaw.thomsonreuters.com/w-043-4580?transitionType=Default&contextData=(sc.Default)) 24. Jewish Manifesto for Local Government - The Board of Deputies of British Jews, <https://bod.org.uk/wp-content/uploads/2022/04/bod-jewish-manifesto-for-local-government-web.pdf> 25. IHRA Definition of Antisemitism in Local Authorities - a Freedom of Information request to Ministry of Housing, Communities and Local Government - WhatDoTheyKnow, https://www.whatdotheyknow.com/request_event/5927879 26. City of Sydney Council passes BDS motion, https://www.sydneycitygreens.org/council_passes_bds_motion 27. Decision - Report on City of Sydney Suppliers and Investments in Relation to the Boycott, Divestment and Sanctions Campaign - Council and committee meetings, <https://meetings.cityofsydney.nsw.gov.au/ieDecisionDetails.aspx?AllId=18950> 28. Australian local councils can become leaders in social procurement, <https://www.socialtraders.com.au/news/australian-local-councils-becoming-leaders-in-social-procurement> 29. COUNCIL MEETING 26 FEBRUARY 2024 Item 0.0 Page 1, <https://www.darebin.vic.gov.au/files/assets/public/v/1/about-council/documents/agendaitem94procurementoptions.pdf> 30. Boycotts Divestment Sanctions Committee - YUGSA, <https://www.yugsa.ca/bdsc> 31. #NoIsraeliArms4Canada: Write letter to Canadian Ministers of Transport and Procurement - Action Network, <https://actionnetwork.org/letters/noisraeliarms4canada-write-letter-to-canadian-ministers-of-transport-and-procurement> 32. Anti-BDS laws - Wikipedia, https://en.wikipedia.org/wiki/Anti-BDS_laws 33. National Commitments to Combat Antisemitism - Public Safety Canada, <https://www.publicsafety.gc.ca/cnt/cntrng-crm/nt-ht/ntnl-frm-cmbttng-ntsmtsm/ntnl-cmmtmnts-cmbt-ntsmtsm-en.aspx> 34. Canadian Handbook on the IHRA Working Definition of Antisemitism - Canada.ca, <https://www.canada.ca/en/canadian-heritage/services/canada-holocaust/antisemitism/handbook-definition-antisemitism.html> 35. Canadian Handbook on the IHRA Working Definition of Antisemitism, <https://www.archtoronto.org/siteassets/media/offices--ministries/pastoral-ministries/office-for-christian-unity--jewish-dialogue/news-article/canadian-handbook-on-antisemitism-2024.pdf> 36. This is an Extract from the Minutes of the Public Meeting of the Toronto Police Service Board that was held on January 13, 2026, <https://www.toronto.ca/legdocs/mmis/2026/mm/bgrd/backgroundfile-285338.pdf> 37. The IHRA Working Definition of Antisemitism- Legal Analysis - NationBuilder, <https://assets.nationbuilder.com/cija/pages/851/attachments/original/1671136887/210203CIJA-LF-IHRA-Booklet-3.pdf?1671136887> 38. Antisemitism and how we define it - Metropolitan Police, <https://www.met.police.uk/notices/antisemitism/antisemitism-and-how-we-define-it/> 39. Antisemitism and how we define it - City of London Police, <https://www.cityoflondon.police.uk/notices/antisemitism/antisemitism-and-how-we-define-it/> 40. London Police Officer Dismissed for Comparing Gaza War to Holocaust, <https://combatantisemitism.org/cam-news/london-police-officer-dismissed-for-comparing-gaza-war-to-holocaust/> 41. FOI - GLA definition of antisemitism [Aug 2021] - Greater London Authority, <https://www.london.gov.uk/who-we-are/governance-and-spending/sharing-our-information/foi-ds-closure-log/foi-gla-definition-antisemitism-aug-2021> 42. Highlights of 2025 Australian Mayors Summit Against Antisemitism - YouTube, <https://www.youtube.com/watch?v=t22xwQc-PO0> 43. Israel lobby has luxury antisemitism summit on Gold Coast while Gaza burns - Michael West,

<https://michaelwest.com.au/israel-lobby-has-luxury-antisemitism-summit-on-gold-coast-while-gaza-burns/> 44. Understanding Antisemitism in Australia, <https://www.aseca.gov.au/sites/default/files/2026-04/understanding-antisemitism-in-australia.pdf>

45. Taking action against antisemitism - Waverley Council, https://www.waverley.nsw.gov.au/community/cultural_diversity_and_inclusion/taking_action_against_antisemitism

46. Strategy to Combat Antisemitism | Waverley Council, https://www.waverley.nsw.gov.au/media/documents/council/strategies/D25_34218_Combating_Antisemitism_Strategy_adopted.pdf

47. Australian Mayor Shares Cities-Oriented Strategies to Fight Antisemitism With European Peers, <https://combatantisemitism.org/cam-news/australian-mayor-shares-cities-oriented-strategies-to-fight-antisemitism-with-european-peers/>

48. Model Antisemitism Strategy for Local Councils, https://www.waverley.nsw.gov.au/__data/assets/pdf_file/0010/248509/Model_Antisemitism_Strategy.pdf

49. Australia Summit PRE REGISTRATION PAGE, <https://australia.combatantisemitism.org/2026>

50. Australian Municipal Leaders to Convene for Antisemitism Summit in Bondi Beach Just Ahead of First Anniversary of Hanukkah Massacre, <https://combatantisemitism.org/government-and-policy/australian-municipal-leaders-to-convene-for-national-antisemitism-summit-in-bondi-beach-just-ahead-of-first-anniversary-of-hanukkah-massacre/>

51. Waverley Council set to co-host major national antisemitism summit, https://www.waverley.nsw.gov.au/top/news_and_media/media_releases/all/2026/waverley_council_set_to_co-host_major_national_antisemitism_summit

52. Australian mayors to convene in Bondi a year after massacre for a national antisemitism summit - The Jerusalem Post, <https://www.jpost.com/diaspora/antisemitism/article-893217>

53. Antisemitism in Australia: A Timeline | AJC - American Jewish Committee, <https://www.ajc.org/news/antisemitism-in-australia-a-timeline>

54. Jewish Coalition Opposes Anti-Democratic Antisemitism Plan, Calls for United, Whole-of-Society Approach - Amnesty International, <https://www.amnesty.org.au/jewish-coalition-opposes-antisemitism-plan/>