BRIEF TO THE STANDING COMMITTEE ON PUBLIC SAFETY AND NATIONAL SECURITY

RE: Bill C-51, ANTI-TERRORISM ACT, 2015

March 20, 2015

Assembly of First Nations

Brief to the Standing Committee On Public Safety and National Security

Bill C-51, Anti-terrorism Act, 2015

This submission is supplementary to the presentation made by National Chief Perry Bellegarde to the Standing Committee on Public Safety and National Security on March 12, 2015 (attached as Appendix A).

In response to several major events involving terrorism, Canada has taken legislative and other measures to protect citizens and infrastructure from terrorist attacks - from amendments to the Criminal Code and security legislation to various operational security measures. While the threat of terrorism is real, a key issue is: at what cost would the proposed measures in Bill C-51 come to First Nations rights to assert our collective rights and to exercise the most basic civil and political liberties?

When we examine this issue in a constitutional and human rights context, we see the inextricable and interdependent inter-relationship between individual and collective rights – individual civil and political rights are often relied on by First Nations to advocate and assert collective land rights and jurisdiction (e.g. through freedom of speech, expression, conscience, assembly, freedom from unreasonable search and seizure, privacy rights). Restrictions and violations of individual human rights under Bill C-51 will necessarily impinge the ability of First Nations to engage in free dialogue and take action to assert collective rights.

In a First Nations context, the politics of fear is being played out domestically where First Nations opposition exists, or is simply feared, respecting major development projects such as pipelines or mines. This domestic politics of fear as it applies to the exercise by First Nations of political and civil liberty is fuelled by several factors. One of these is the significant shift in the legal balance of power flowing from a critical mass of First Nations wins in major court decisions defining the Crown's constitutional obligations particularly when making decisions respecting natural resource management and development. There has been notable success in the recognition of Indigenous peoples' collective rights to land and resources in international human rights jurisprudence. Advances have also been made in the promotion and articulation of international human rights norms in their application to First Nations collective rights as peoples and nations.

First Nation governments' positions and decisions respecting any specific development proposal are contingent upon a range of factors including First Nations' assessment of the impacts of any given proposal on the land, the waters, the resources and the people, evidence of any respect for the right of First Nations to benefit from resource

development in our lands to cumulative impacts and many others. First Nations are not opposed to all major development proposals but First Nations are always opposed to initiatives and behaviour that treat us as if we are not here on the land as peoples with an equal right to self-determination.

The politics of fear was evident recently in the objectionable remarks recently made by Parliamentary Secretary (Aboriginal Affairs) Mark Strahl in the debate on Mr. Romeo Saganash's private members bill, C-641, the United Nations Declaration on the Rights of Indigenous Peoples Act). In his remarks, Mr. Strahl equated support and respect for the principle of free, prior and informed consent as a policy that would cripple the economy. His remarks as a whole[1] on the principle of free, prior and informed consent reveal just how firmly this government views Indigenous peoples' and the exercise of our rights under international human rights law as threats to the economic stability of Canada.

Consent is an aspect of aboriginal title as held by the Supreme Court of Canada in the 2014 decision *Tsilhqot'in Nation* v. *British Columbia* (2014 SCC 44). Consent is also an aspect of self-determination in many situations involving land and resource decisions. This is confirmed in the *United Nations Declaration on the Rights of Indigenous Peoples*. Federal opposition to the principle of free, prior and informed consent principles under international human rights law is contrary to Canada's obligations as a member State of the United Nations.

We find highly disturbing the pattern of federal spokespersons and police characterizing any and all opponents, including First Nations, to certain pipeline projects as "extremists" - see RCMP memo entitled "Criminal Threats to the Canadian Petroleum Industry" submitted with National Chief Perry Bellegarde's statement of 12 March 2015.)

Since the National Chief's presentation, there have been more reports of over the top surveillance responses to First Nations activism. In a March 18th news report, the Aboriginal Peoples Television Network reports that information obtained under Access to Information shows that Aboriginal Affairs not only shared and received information from the Canadian Security Intelligence Agency on the peaceful IdleNoMore movement in 2012 and individuals participating in these activities, it also supplied details about a meeting between government officials and First Nation leaders. This information then was passed on to the Integrated Terrorism Assessment Centre (ITAC)[2].

First Nations people even have been regarded as a threat simply for pursuing human rights claims under the *Canadian Human Rights Act* (CHRA) to ensure equal treatment in the provision of government services to First Nations children and their families. Social policy activist Cindy Blackstock, a highly respected children's rights activist has

[1] Available at https://openparliament.ca/debates/2015/3/12/mark-strahl-1/
[2] http://aptn.ca/news/2015/03/18/aboriginal-affairs-shared-wide-range-information-spy-agency-bolster-idle-surveillance-documents/

been the object of federal government surveillance.[3] Her account of her experience as an object of surveillance as a result her advocacy on behalf of First Nations children is alarming to say the least.[4] The government's actions are now the subject of a complaint alleging this constitutes retaliation for making a complaint (retaliation for making a complaint is a discriminatory practice under the CHRA).

There also has been surveillance of First Nations and others who attend National Energy Board hearings. The National Energy Board worked with the RCMP and Canadian Security Intelligence Service to monitor the "risk" posed by environmental groups and First Nations in advance of public hearings into Enbridge Inc.'s Northern Gateway project, according to documents released under Access to Information in a 2013 Globe and Mail story.[5] The BC Civil Liberties Association (BCCLA) has filed complaints about this activity with the Commission for Public Complaints Against the RCMP. BCCLA says these activities violate sections 2(b), 2(c), 2(d) and 8 of the *Canadian Charter of Rights and Freedoms*.

Additional evidence of this pattern of pressure to suppress advocacy by First Nations is the imposed conditions of the federal Tribal Council Funding Program that came into effect April 1, 2014.[6] This policy prohibits the use of funding for any Tribal Council costs related to supporting "political advocacy", "political activities" or "any activity that is of a "representative or advocacy nature". Political advocacy in this policy is defined as "participating in activities such as lobbying, petitioning, rallying, etc., which are intended to influence the political decision making process of another government or governments. For further clarity, 'political advocacy' does not refer to the representation by tribal councils and their employees in administrative decision-making processes".

Surveillance and interference with people asserting their fundamental human rights is a human rights violation as Canada should know. Amnesty International Canada in commenting on Cindy Blackstock's situation notes that the United Nations Declaration on Human Rights Defenders[7] recognizes the right and obligation of all members of society to speak out against human rights violations. The Declaration prohibits retaliation, pressure or "any other arbitrary action" against someone as a consequence of their efforts to defend human rights.[8][emphasis added] In addition, rights to privacy, freedom of expression, opinion, association, and peaceful assembly are protected by the *International Covenant on Civil and Political Rights,* notably Articles 17, 18, 19, 21,

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[3] See http://www.thestar.com/news/canada/2013/05/29/conservative_government_found_spying_on_aboriginal_advocate_tim_harper.html

[4] http://www.thestar.com/news/canada/2013/05/29/conservative_government_found_spying_on_aboriginal_advocate_tim_harper.html

[5] http://www.theglobeandmail.com/report-on-business/industry-news/energy-and-resources/csis-rcmp-monitored-activists-for-risk-before-enbridge-hearings/article15555935/.

[6] The Tribal Council Funding Program Policy can be found at: https://www.aadnc-aandc.gc.ca/eng/1386290996817/1386291051138

[7] United Nations, General Assembly Resolution A/RES/53/144.

[8] http://www.amnesty.ca/news/news-updates/invasive-surveillance-of-human-rights-defender-cindy-blackstock

and 22. First Nations' equal right to self-determination is protected by Article 1 of the same covenant.

Concerns respecting Part 1 - Security of Canada Information Sharing Act

The Assembly of First Nations believes that Part 1 of this Bill will encourage and lead to more unjust surveillance of First Nations people contrary to domestic and international human rights standards.

The new definition of "activity that undermines the security of Canada" contains several broad and vague elements that reach well beyond existing legal definitions of "terrorist activity".

In addition to overriding privacy protections for sharing information, the whole approach to identifying threats to the security of Canada sets up conditions for police and civil servants in many agencies to profile and surveil activists, leaders and ordinary citizens based on their political views and policy objectives, should their actions fall outside what government agencies determine as legal – a highly contentious issue in a First Nations rights context.

As some experts have pointed out, a protest or march without a "proper" municipal permit, could result in such activities being deemed "unlawful", thus opening organizers, participants and supporters to removal of privacy protections and "information sharing" (aka surveillance and monitoring).

The definition in s. 2 of "activity that undermines the security of Canada" includes interference with the "administration of justice" which may in turn include interference with temporary or permanent injunctions. This is a live issue with respect to local First Nations protest activities. Similarly, any number of actions, including political speech, undertaken by First Nations leaders could be construed as interference with the "economic and financial stability of Canada", particularly when government policy defines such stability in terms of the expansion of resource extraction sectors. The core of the government's Economic Action Plan is support for resource extraction.

We note that "interference with critical infrastructure" is similarly included in the definition. While 'critical infrastructure' is undefined, this possibly includes mining, hydrocarbon and pipeline projects, at the very least.

The notion of "interference" that is central to paragraphs (a) and (c) of s. 2 for example, is not defined. In the context of blockades by First Nations, these activities can range from the slowing of traffic to distribute information to the full cessation of traffic. The definition excludes and exempts "political dissent" and "lawful protest". These are also undefined terms. The difficulty with such ambiguity is our experience that corporate actors and governments receive the benefits of generous interpretation, whereas First Nations do not.

The AFN believes the broadly worded definition in s. 2 of “activity that undermines the security of Canada” and the high likelihood of differences of opinion about what is “lawful” dissent or protest exposes First Nations to unjust risk of surveillance and profiling.

Proposed section 9 of the Security of Canada Information Sharing Act will operate as a bar against civil liability in the administration of the Act. This further insulates actions taken pursuant to this Act from liability.

The Act would amend s.4 of Fisheries Act to permit information sharing to other government of Canada agencies to detect, identify, analyze, prevent, investigate or disrupt maritime activities which may undermine the security of Canada. Given the number of conflicts regarding fisheries (including the controversy regarding the herring fishery right now), this section could be used by DFO and CSIS to conduct disruption operations against First Nations protesters, fishers and governments.

Our reading of the Bill is that First Nations and individual First Nation persons may never know what information is being shared, nor will they be able to challenge such sharing.

Canada must abide by international human rights law and must correct its current practice of over-surveillance and other efforts to suppress the fundamental civil and political rights of First Nations people exercising their inherent rights to speak about, and take peaceful political action on, human rights issues, both individual and collective.

Concerns respecting Parts 3 and 4

The Assembly of First Nations shares the concerns of many other commentators about:

1. the legal uncertainty of the meaning of the proposed new offence - advocating and promoting “terrorism offences in general” (proposed Criminal Code s. 83.221 in Part 3 of Bill C-51);
2. the overly broad definition of “terrorist propaganda” in s. 83.222(8) in Part 3;
3. the proposed preventative detention provisions which would allow warrants approving Charter violations in advance (proposed Criminal Code s. 83.3, in Part 3);
4. the new powers contemplated for CSIS under this Bill to disrupt activities that are protected by the Charter (Part 4).

These all raise very serious Charter issues and questions about Canada’s commitment to international human rights standards. Many of our core concerns relate to the sweeping definition of activities captured within the scope of the bill, combined with the vague and remarkably limited safeguards proposed. Despite the assurances of government, these safeguards would likely not apply to a range of First Nations issues.

The vagueness in what constitutes a terrorism offence may have profound and unintended consequences, which extend far beyond the First Nations context. For

example, whether Bill C-51 would apply to state sponsors of terrorism in terms of violations of the Terrorist Bombing Convention may have profound implications for Canadian foreign policy. Broad definitions of terrorism will create a wide range of unintended consequences, for First Nations and for Canada.

Based on the overwhelming evidence that First Nations are already the object of specious surveillance in violation of our fundamental human rights and privacy rights, we have real fears about where legalizing and encouraging such behavior under Part 1 of this Act will lead - particularly with respect to the above mentioned provisions that create new criminal offences and provide new powers of detention, and CSIS powers to "disrupt", all under a cloak of secrecy.

First Nations activism, relationship building & the rule of law

Freedom of speech, expression, conscience and assembly are integral parts of First Nations cultures and societies since time immemorial. These freedoms are an integral part of asserting inherent rights in the face of colonialism and asserted Crown sovereignty. The protections afforded to First Nations activists, cited by proponents of Bill C-51, are inadequate. This statement is not based on speculation, but rather on experience.

Since the adoption of section 35 of the *Constitution Act, 1982*, federal and provincial governments often have adopted excessively narrow interpretations of court decisions recognizing and upholding First Nations' rights.

In the face of Crown failure to apply general principles of law even from Supreme Court of Canada decisions to new and similar fact situations through appropriate policies, decisions and processes, First Nations are often left few options other than asserting rights through "protests", blockades and "occupations" - to communicate positions and as a means of physically and symbolically asserting inherent jurisdiction.

Most of the foundational principles of aboriginal rights law have their origins in prosecution of Indigenous rights activists for allegedly illegal conduct. Under C-51, it is increasingly likely that cases such as *Sparrow*, *Van der Peet* and *Badger* could be classified as 'terrorist' activity. Even the recent *Tsilhqot'in* case had its origins in a protest by the Tsilhqot'in Nation over forestry issues.

Permitting CSIS or other law enforcement agencies to engage in kinetic or other disruption operations against Indigenous rights activists might seriously jeopardize the ability of First Nations to seek vindication of aboriginal rights claims in civil courts. These concerns have been expressed above with respect to surveillance of Indigenous human rights defenders.

However, First Nations have also faced kinetic disruption, involving foreign security forces, working collaboratively with domestic security agencies. The only reason the AFN is aware of such incidents is that they were reported in foreign news sources.[9]

The Security Intelligence Review Committee (SIRC) has never issued any thematic reports specific to the activities of Canadian intelligence agencies and First Nations activists. As a result, any information which we do possess on such operations (be they pure analysis of information, information gathering or disruptive operations) is thus quite limited.

While the AFN lacks reliable information on CSIS activities, this case serves as an example of our concern that Canadian security agencies will expand kinetic operations against First Nations human rights defenders and protesters in order to advance interests unrelated to terrorism, such as interests related to civil, tax or human rights litigation.

Bill C-51 would both expand the potential for disruptive operations, by extending considerable protections to CSIS agents in any number of activities, including, possibly, immunity from prosecution while conducting disruptive operations. This raises the specter of increased use of 'agent provocateurs' in the context of protests without accountability or review.

When private sector interests are granted rights under federal or provincial law in ways that infringe First Nations collective rights, disputes can arise. Private sector entities sometimes seek injunctions against First Nations people taking political action to assert inherent and Treaty rights.[10] This can lead to First Nations individuals becoming criminalized when they refuse to cease such actions or when they are deemed unlawful.[11] This in turn would raise a risk of such behavior leading to surveillance under the authority of Part I of Bills C-51 because First Nations rights assertions often relate to developments that involve for example, infrastructure projects or challenge conventional

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[9] Carolyn Thompson, "Canadian Man Admits Assaulting US Government Agent" (Pioneer Press: 05/04/2009), online: http://www.twincities.com/localnews/ci_12292650. See also, James M Odato, "Illicit Tobacco Fight's Weak Link" (Albany Times Union: 11/10/2013) online: http://www.timesunion.com/local/article/Illicit-tobacco-fight-s-weak-link-4971160.php.

[10] See for example, *Hudson Bay Mining & Smelting Co.* v. *Dumas et al.,* 2014 MBCA 6. This case is also an example of how peaceful blockades can be considered "unlawful" depending on how a statute is drafted and interpreted. See also, *Behn* v. *Moulton Contracting Ltd.*, [2013] 2 SCR 227, 2013 SCC 26 (CanLII), http://canlii.ca/t/fxc12. The *Behn* case increases the difficulty for First Nations to challenge corporate injunctions on the basis that corporate conduct undermines the ability of First Nations to exercise aboriginal or treaty rights. This is a particularly disturbing outcome, given decisions such as *SWN Resources Canada Inc* v *Claire*, 2013 NBQB 328 (CanLII), http://canlii.ca/t/g0trb. In that case, a corporate actor was able to secure an ex-parte injunction – the First Nations protesters did not have an opportunity to appear to argue the injunction. These cases, combined with Bill C-51, may not only elevate civil complaints to criminal matters, but may also raise them to national security issues – while at the same time depriving First Nations with the opportunity to advocate in support of their rights and interests.

[11] For example, see *Platinex Inc.* v. *Kitchenuhmaykoosib Inninuwug First Nation*, 2008 CanLII 11049 (ON SC).

notions of how sovereignty is exercised in Canada.

The rule of law is the legal principle that law should govern a nation, as opposed to arbitrary decisions by individual government officials. Determining what the rule of law is, in the often complex process of determining First Nations rights, requires a "comprehensive and nuanced" approach because of the complex mix of private interests, statute law, and aboriginal and Treaty rights.[12]

Adopting laws and operational practices that expose First Nations activists, leaders and citizens to more criminal profiling through Bill C-51's vague and broad concepts of threat undermines efforts at reconciliation. Canada's security legislation should be better informed and guided by the minimum standards of domestic and international human law and First Nations' section 35 rights.

The reconciliation that the Supreme Court says is the objective of section 35 of the *Constitution Act, 1982* would be placed in jeopardy under this Bill by creating conditions where First Nations activists are unjustly and wrongly profiled as potential threats to the "security of Canada".

In addition, the impacts of this Bill on First Nations capacity to assert and exercise our collective rights through the exercise of fundamental civil and political rights should be discussed with First Nations as part of the Crown obligations under section 35 of the *Constitution Act, 1982*.

As a result, the AFN opposes Bill C-51 and recommends:

1) That the Government withdraw the Bill and consult properly with First Nations about its impacts on our rights.

2) That the Government discuss with First Nations options for a review process to examine all federal legislation that can impact the assertion of our section 35 rights.

[12] *Frontenac Ventures Corporation* v. *Ardoch Algonquin First Nation*, 2008 ONCA 534; *Henco Industries Ltd.* v. *Haudenosaunee Six Nations Confederacy Council* 2006 CanLii 29082 (ONCA).

ABOUT THE ASSEMBLY OF FIRST NATIONS

The Assembly of First Nations (AFN) is the national, political representative of First Nations governments and their citizens in Canada, including those living on reserve and in urban and rural areas. Every Chief in Canada is entitled to be a member of the Assembly. The National Chief is elected by the Chiefs in Canada, who in turn are elected by their citizens.

The role and function of the AFN is to serve as a national delegated forum for determining and harmonizing effective collective and co-operative measures on any subject matter that the First Nations delegate for review, study, response or action and for advancing the aspirations of First Nations.

For more information, please contact us at:

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Appendix A

PRESENTATION TO THE STANDING COMMITTEE ON
Bill C-51
PUBLIC SAFETY AND NATIONAL SECURITY
March 12th, 2015
NAITONAL CHIEF PERRY BELLEGARDE
9:45 a.m.

CHECK AGAINST DELIVERY

[traditional greeting]

Bill C-51 is the subject of a great deal of commentary and controversy. First Nations have a long history in this country of dealing with laws that threaten our rights so we are always on guard against any legislation that could affect our rights, our citizens and our traditional territories.

The key issues at stake in Bill C-51 are the State's power to place individuals or groups under surveillance, to monitor their everyday activities, to create criminal offenses that affect our ability to exercise our legally recognized rights, and the overall relationship of State power to fundamental human and Indigenous rights.

On these issues, First Nations have expertise and hard experience to offer this Committee, the government and Canadians as a whole.

First Nations people are often forced to take a stand against actions or initiatives by governments that refuse to respect or protect our rights. These activities are often deemed "protests" when in fact we are only calling on Canada to obey its own laws, which include the recognition and affirmation of inherent Aboriginal rights and Treaties in Canada's own Constitution.

So at the core of this discussion for First Nations is the unfinished business of balancing federal and provincial laws and authorities with the inherent jurisdiction and sovereignty of First Nations. At its core, this discussion is

about reconciliation - reconciling Canada's claims to sovereignty with our pre-existing rights, title and jurisdiction, and Canada's Treaty obligations.

We need to finish that work. It is the way forward. But until we do, First Nations as individuals and as nations will assert our fundamental civil and political rights. We've had to do this many times in the past in the face of a history of imposed, oppressive laws - laws that we are always told are good for us and good for Canada. But in fact they were outright attacks on our identity and our rights.

We have suffered under laws that banned our cultural and spiritual practices, laws that denied our right to vote, laws that prevented us from going to court to fight for our rights, laws that gave the State the power to steal our children and assault their minds and bodies, to try and kill our languages and traditions. We have been subjects of surveillance and suspicion, and seen as a threat for as long as this country has existed. Why? Because our cultures, values and laws place a priority on protecting the lands and waters, they place primacy on sharing and sustainability. Canada knows that our existence as peoples and nations qualifies and calls into question its claims to absolute sovereignty. But our people survived and prevailed over all the assaults against us because our ancestors and Elders stood up for our people and our rights. And this generation is not going to forsake our ability to protect our lands and territories and rights that has ensured our survival.

We will continue to assert our inherent sovereignty and sacred responsibility to protect the land and the waters. We have the right to be

decision-makers in any activities that affect our lands and territories. Our laws and legal traditions embrace a balanced view of security, development, environmental protection and fundamental rights. We have deep and strongly held traditions that respect individual autonomy, freedom of speech and how to balance these for the collective good. Canada can learn from this.

That is the history and perspective we bring to this Bill. We believe in the right to safety and security but the federal government's rush to ram this legislation through is undemocratic and it violates our individual and collective rights.

We have many concerns with this legislation. **First, the proposed *Security of Canada Information Sharing Act* sets out an overly broad definition of "activity that undermines the security of Canada".** We see this as a euphemism for an "excuse to spy on" First Nations when they exercise their collective and individual rights. Our people could find themselves under increasing surveillance because of the broad, vague concepts and activities covered by this phrase. It clearly goes way beyond the current Criminal Code definition of "terrorist activity."

The 'for greater certainty clause' that excludes "lawful" advocacy, protest, dissent and artistic expression is not adequate to deal with complexities of the ongoing task of reconciling First Nations law and jurisdiction with Canada's asserted sovereignty.

This government often invokes the rule of law. We would like some rule of law that respects our constitutionally protected rights and our fundamental human rights. The days are gone when absolute parliamentary supremacy trumps human rights and First Nations rights. But we still see this government struggling to accept the Constitution Act of 1982 - both Part 1, the Charter, and Part II which recognizes and affirms our Treaty and Aboriginal rights. Both sets of rights are at stake in Bill C-51.

First Nations maintain that Bill C-51 will infringe our freedom of speech and assembly, our right to be free of unreasonable search and seizure, our right to liberty, our fundamental rights as peoples under section 35 of the *Constitution Act, 1982,* our Treaty rights and our right to self-determination. Our right to self-determination— recognized in the *United Nations Declaration on the Rights of Indigenous Peoples*— includes the right to protect and make decisions about activities and laws affecting our lands and waters. But there is a balance between rights and security and we can find it through dialogue with one another as nations. Unfortunately, the process for developing this legislation did not meet the federal government's duty to consult and accommodate and on that point alone is subject to challenge in the courts if the government tries to impose it on us.

Bill C-51 sets up conditions for conflict by creating conditions where our people will be labelled as threats – threats to critical infrastructure or the economic stability of Canada - when asserting their individual or collective rights as First Nations citizens. This is not an abstract argument for our people. We've been labelled as terrorists when we stand up for our rights and our lands and our waters. We can see how First Nations have been

lumped in with terrorists and violent extremists when they are asserting their fundamental rights and jurisdiction as in the recently leaked RCMP memo entitled “Criminal Threats to the Canadian Petroleum Industry”. I am submitting as part of this presentation.

First Nations have an unmatched record as peaceful peoples in the face of the most appalling human rights abuses, which is particularly exceptional when we remember the unrelenting assaults on our values, laws, jurisdiction and fundamental human rights.

We are peace-loving peoples but we will push back against assaults on our most basic liberties. We stand with the many other Canadians who are not willing to forfeit their fundamental rights and freedoms, who are demanding that this government engage in more careful crafting of important legislation. Canada must do better and must do more to meet its constitutional and Treaty responsibilities to First Nations.

I leave you with a statement directed not just at this Committee but to all Canadians. First Nations know better than anyone how easy it is for government to ignore, erode and eradicate our most basic human rights and freedoms **until you barely recognize the land you’re living in**.

First Nations deserve better, Canadians deserve better. We cannot turn our backs on our hard won human rights and we cannot turn our back on the Indigenous rights, Treaties and title on which this country was founded. We can do better and we must do better.

First Nations will vigorously oppose any legislation that does not respect and protect our rights. First Nations will stand up for the rights of our people and our responsibilities to our traditional territories.

We make the following recommendations:

1) That the Government withdraw the Bill and consult properly with First Nations about its impacts on our rights.

2) That the Government discuss with First Nations options for a review process to examine all federal legislation that can impact the assertion of our section 35 rights.

Appendices

RCMP Memo