Federal Court ~ Aboriginal Law Bar Liaison Committee

Thursday, October 13, 2016
Musqueam Cultural Centre
Vancouver, B.C.

MINUTES

Attendance : Chief Justice Crampton, Prothonotary Lafrenière (Chair), Professor Hadley Friedland, Professor Sarah Morales, Scott Robertson (IBA representative), Krista Robertson (CBA representative), Diane Soroka, Paul Anderson (DOJ representative), Robert Janes, Anita Schwartz (Vancouver registry); **Phone:** Justice Shore, Justice Strickland, Sheldon Massie (DOJ representative), Andrew Baumberg, Jennifer Choi, Victoria Luxford.

1. Opening
Prothonotary Lafreniere thanked the Musqueam First Nation for welcoming members of the Committee for this important meeting.

Review of Agenda
It was noted that Aimée Craft will present at the next meeting.
Sheldon Massie noted the 5-year review of the Specific Claims Tribunal was published last month.
Prothonotary Lafreniere noted the goal of having both short and long-term plans for this committee. The purpose of having speakers today is to look at where we are and where we are going in the long term.
CJ Crampton added that the Court developed a strategic plan a few years ago, which included the development of practice guidelines, which have been completed. Also, there have been new developments, including the TRC, the Daniels decision and increasing calls to make space in court proceedings for indigenous law, which suggest the need for the Committee to formulate a new strategic vision to guide its activities for the next few years.
Justice Shore noted the continued effort by the Court to promote a cultural dialogue to allow members of the court to approach Indigenous laws so that we can work with them in a way that is helpful. There is a need for a meeting of the minds to enable a climate that is different. This meeting represents a new beginning for the Committee, but with a strong foundation, with the support of the Chief Justice.

Minutes of May 4, 2016 – approved.

2. Discussion: harmonization of Indigenous and non-Indigenous law for matters coming before the Federal Court

Professor Sarah Morales opened with a Hul'qumi'num term that grounds one in the land.
She made reference to the work of Professor Borrows – the need for recognition of Indigenous law. Indigenous peoples were the first practitioners of law in Canada. They had norms of practice to govern their relations that developed into highly organized systems of law. At contact, these laws were recognized and given respect, as shown by the treaty process, commercial transactions, and marriages. There was also a willingness to learn from indigenous law. However, although influence

of Indigenous laws waned in the face of increased European settlement and policies of assimilation, they still have not disappeared.
She then explored the topic 'what is indigenous law' and found that it required a completely different approach than that derived from her common law experience. Law is a practice that cannot be separated from its surrounding culture.

There followed a song (accompanied by drum) from a member of the Musqueam community.

Professor Morales continued, noting that since in the contemporary context Indigenous peoples live in a cross-cultural context, the laws that guide their lives must be drawn from the cultures that surround them. This can include both the indigenous context and the wider Canadian context. She went on to speak about her exploration of Hul'qumi'num law (she referred to the term Snuw'uyulh – "our way of life" and "our way of being on Mother Earth"). Initially, when she began her research, she found that they did not have simple equivalents for key terms in common law, but instead had an underlying framework in many of their practices. Often, these were difficult to recognize directly from a common law perspective, given how deeply they were imbedded in the culture. Her methodology had to change.

Through listening to songs and stories, and participating in community practices, she found that it was possible to discern seven key legal concepts: Kinship, Respect, Trust, Sharing, Love, Forgiveness, Responsibility. These seven concepts are not basic legal principles – in the sense that they can be applied directly to legal questions. When spoken of in the legal context, they describe conditions generated through law. Snuw'uyulh is a state or condition and the Hul'qumi'num legal tradition encompasses all the animating norms, customs and traditions that produce or maintain that state.

She noted that Professor Borrows identified five sources of law: Natural, Deliberative, Positivistic, Customary, Sacred. In her community, most law comes from the sacred, from the land from which they and their ancestors come. One cannot separate land and culture. Many key legal teachings are directly connected to the landscape, and thus to First Ancestor stories connected to the landscape. By telling sacred stories, these ancestors come to life, along with the legal teachings that they represent.

Professor Morales then gave an example of an actual legal dispute and how it would be resolved using indigenous law compared with the common law. The dispute concerned Walker Hook on Saltspring Island, which was an ancient burial site. The First Nation asked for the Environmental Appeal Board to issue an order to stay development of a fishery in the area, arguing that the discharge of effluent would desecrate the sacred site. Elders noted the specific protocols for respect of the burial site that must be maintained. In the Hul'qumi'num legal tradition, there is a deep connection between spirituality and law – violation of the law would affect everyone negatively.

She noted a key passage from one of the Elders, Arvid Charlie: "I keep getting asked about our sacred areas. But to me, that's like asking what part of a church is important or which part of a story is important. Our whole territory is important to us." She added that the law includes a principle of respect and of reciprocity – an acknowledgement that they owe certain obligations to ancestors in order to maintain good relations with them. After the Appeal Board rejected the request, August Sylvester (a Penelakut Elder) noted: "… the Canadian laws that permitted the Approval are in direct confrontation with the laws of the Hul'qumi'num people."

It is artificial to separate the concept of pre-existing societies from that of pre-existing legal orders. We need to take this reality into account, to "make space" for Indigenous legal traditions, though this raises big questions for the practice of Canadian law, i.e. How? This is a challenge, but at least we are beginning to discuss the issue.

She read the following passage: "The Court's judgment in Delgamuukw concluded with the words, 'Let us face it, we are all here to stay.' True enough: but if in the face of this reality we are to find space for multiple legal orders to co-exist, and if we are ultimately to achieve an equal reconciliation, we must recognize that to stay must also be to learn" – Chief Justice Finch (BCCA – former)

Professor Morales concluded that this will take considerable work by both indigenous and non-indigenous people, quoting Cowichan Elder Angus Smith's words to her, encouraging her to take up this task, but noting that she would need help: "When I'm sitting here all by myself, I often wonder who is going to carry all this work for us – To make things right. You've got a name and you're the one that's going to do this kind of work ... Somebody's got to be there to help her. Help our people with this kind of work because we need it."

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Professor Hadley Friedland spoke about an indigenous legal research methodology and approach to applying the law in legal reasoning. She quoted remarks of Chief Justice Beverley McLachlin, who called for "all members of the judiciary" to have access to education and materials about Indigenous legal traditions. The Chief Justice framed her call as a critical, national "access to justice" measure, which must necessarily mean having concepts of Indigenous justice and the legal processes of achieving justice at the "Canadian justice table" - Keynote Address (delivered at the Canadian Institute for the Administration of Justice 2015 Annual Conference, Aboriginal Peoples and Law: 'We Are All Here to Stay', Saskatoon, 16 October 2015) [unpublished].

We are now moving from a "why" to a "how:" the hard work of indigenous law.

- Canadian judges, senior government officials, lawyers say we've gone as far as we can go in the abstract. Chiefs and community members say we need tools.
- American Tribal Court Judges say Indigenous laws are barely being used in tribal courts – for this to happen, something more is needed (Fletcher, Sekaquaptewa, Zuni Cruz).
- Internationally, where constitutions require 'customary law' be used in courts, disuse, challenges of change, disconnect from 'on the ground' understanding and practice (eg. South Africa, South Pacific).

American Tribal Court Judges say there is a pressing need:

- To "locate methods of finding, analyzing, and applying [Indigenous] law." – Mathew Fletcher
- For "useful theories or at least guidelines for working with [Indigenous law]." – Pat Sekaquaptewa
- For an approach that "represents a serious respect for [Indigenous] law". – Christine Zuni Cruz

There are seven main challenges that have been identified: Intelligibility, Accessibility, Equality, Applicability, Legitimacy, Relevance and Utility, Distorting Stereotypes (positive or negative).

There followed some discussion in the Committee regarding the issue of *applicability*. In some cases, there were laws that were in place 200 years ago but which might not be appropriate to apply today. This is also true in the common law context. Also, there was a question regarding the applicability of indigenous law in contexts where common law is currently being used.

Regarding *equality*, Professor Friedland noted that there is a view that some indigenous law is not consistent with the meta-principle of equality. However, there are ways to work this through – indigenous peoples are within a cross-cultural society that allows for internal pressure from within communities, but also recourse to international human rights law.

Robert Janes noted two aspects of the equality issue: one general Canadian perspective is that a 'non-indigenous person should have the same rights as an indigenous person'; the second (internal) perspective is that in some communities, for example, all leadership decisions are made by only one gender or the other.

In response, Professor Friedland gave an example of one Canadian judge who refused to apply indigenous law, because of an experience with an indigenous community Elder who sanctioned negative gender practices.

A further issue is *relevance* and *utility* – some judges simply don't have the time to fully engage in a specific indigenous legal tradition if they are not likely to hear many cases related to that tradition.

CJ Crampton suggested that it simply is not feasible for a judge to go out on the land for a significant period of time to learn a specific indigenous legal system.

Prothonotary Lafreniere added that this highlights the need to get appointments to the court of people who come with experience.

CJ Crampton pointed out the experience of the indigenous judges in the U.S. (as presented by Professor Friedland): according to Professor Morales, even then they apparently have difficulty applying indigenous law. What are the things that we can reasonably make space for? We have to start somewhere.

Justice Michel Shore noted that to be realistic, and to have vision and start a new dialogue, there are certain things that are rudimentary. We need to understand the narrative and music behind the parties. He recommended some useful texts:

- "If This Is Your Land, Where Are Your Stories?: Finding Common Ground" by J. Edward Chamberlain; begin to understand the stories, as we do with our children or spouse. We need to be more than an observer, but a participant, to understand all their struggle and strengths.
- "The Inconvenient Indian" and "Truth About Stories" both by Thomas King.
- "Telling it to the Judge" (McGill Northern Series). How do we translate words between cultures if there is no equivalent in the other culture? The key is "who one is".
- "Triumph of Narrative" (Robert Fulford) - He added that there is a view among some that the 11 main treaties were not often written according to the way they were spoken. We need to enter the indigenous narrative and paradigm. He could not have mediated a PTSD case without memorizing each soldier's story.

Professor Hadley then presented some resources (including references) used when researching indigenous laws:

- Elders, families, clans and societies (Borrows)
- Stories, songs, practices and customs (Borrows)
- Elders and community knowledge-keepers (Fletcher)
- Narrative, practices, rituals and conventions (Napoleon)
- Dreams, dances, art, land, nature (Justice Within, Indigenous Legal Traditions)
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- Language (Fletcher, Borrows)
- Dances, songs, ceremonies (Boisselle)
- Pots, petroglyphs and scrolls in an ancient ceremonial lodge (Borrows)
- Historical descriptive accounts recorded by outsiders (Borrows)
- Witness testimony, trial transcripts from Court cases (Napoleon)
- Oral histories and collectively owned stories (Napoleon)
- People's personal memories and direct experiences (Napoleon)
- Interviews (Napoleon)
- Published anthropological and historical research (Napoleon; Fletcher)
- Published collections of stories (Napoleon)
- Written work by community members, including fiction, stories, poems or legends (Fletcher)

She then described how, in her law faculty class, she would circulate tangible materials for students to explore. However, we need to grapple with some of these materials.

There are three broad categories of indigenous legal resources:

1. Resources that require deep inherent knowledge and full cultural immersion,
   - Perceived as most ideal/legitimate
   - Least available and accessible (e.g., in some cases, these require special ceremony)
2. Resources that require some community connection or access,
   - Perceived as next best ideal/legitimate
   - Limited availability and accessibility, challenges
3. Resources that are publically available
   - Perceived as least ideal/legitimate
   - Most available and accessible

Scott Robertson noted that one challenge in immersing oneself in a culture is the issue of language – there are so many indigenous languages, and so much of law is imbedded in language.

Professor Friedland agreed that language is key challenge. She gave an example of a judge who would apply an indigenous word that represents a broader concept and apply it to a federal statute. She also noted that in some communities, there are few speakers of the native language – it may be impossible to reinvigorate their laws if they must wait until everyone speaks the language again. There must be other ways to proceed – we must start from where we are.

Robert Janes noted that indigenous law is a matter of presentation and evidence in court. Whereas of common law, the lawyer would rely on written text, but for foreign law (e.g., French law) there would be a need for a witness. For indigenous law, there are very real issues of accessibility. There will never be enough indigenous judges familiar with each indigenous law.

Professor Hadley responded that we cannot simply stop due to this issue. There is also a challenge for many people even to access Canadian common law. Is it conflict of law issue, or is this a mandate

to grapple with indigenous law as we approach civil and common law. First we need to imagine engaging indigenous law.
One participant noted that oral traditions must be translated into a form that can be understood. Keepers of law do not always want their laws to be taken down. In other cultures, when the epics by bards were written down, it was felt that something was lost, and people eventually were no longer able to maintain the oral tradition.

Professor Friedland responded that some things cannot be shared or written down. She recommended the book "Aboriginal Justice and the Charter: Realizing a Culturally Sensitive Interpretation of Legal Rights" (by David Milward). There are choices – if the law will not be shared, then it cannot be relied upon in a court proceeding. This is similar to the issue of Crown privilege – many materials are kept secret.

There was an example of a dialogue between an Anishnabe Elder and a Rabbi, in which the Elder noted that his community wished to keep its tradition oral, and the Rabbi replied that originally the Jewish tradition was also oral, but eventually they decided to shift to a written tradition. It must be a community-based decision, not imposed from without.

Justice Shore noted that we may stimulate the greater writing of oral traditions, but it might take considerable time. We cannot wait for so many years. Is it not possible to get someone who is able, with the confidence of both parties, to provide what is intrinsic to the indigenous law?

Professor Friedland then provided some methods for engaging with indigenous laws, used by indigenous legal scholars:

- Identifying implicit legal principles embodied in local practices, activities and experiences (Napoleon et al)
- Land-based Learning (Borrows, Morales, Littlechild)
- Art, beading, shawls (Bluesky, Kennedy, Napoleon)
- Spiritual ceremonies, sweat lodges, vision quests, dreams (Borrows, Bird, Lindberg, Mills, Boiselle)
- The Linguistic Method (Fletcher)
- Interviewing elders and knowledge-holders (All, Zuni-Cruz, Craft)
- Story-based Learning (Borrows, Bird, Napoleon & Friedland)
- The Sources of Law Method (Borrows)
- The Single-Case/Story Analysis Method (Borrows)
- The Multi-Case/Story Analysis and Legal Theory Method (Napoleon)
- Indigenous Law Research Unit (ILRU) Method: Legal Analysis and Synthesis in conversation with communities (Friedland & Napoleon)

Professor Friedland then provided some adapted law school methods for engaging with indigenous laws:

- There is a pressing need for transparent, rigorous methods of engagement with Indigenous laws
- Using adapting law school methods is about supplementing and supporting, not supplanting more traditional methods
- In practice, doing so is perceived as respectful and hopeful, leads to and enhances capacity to engage in other ways and leads to substantive results.

There is a need for agreement by parties of an expert witness who can speak to the law.

The ILRU method involves:
Phase 1: Starting with a Specific Research Question

- Bring specific questions to Indigenous Legal Traditions that we need answers to today.
- Practical, targeted questions about managing or resolving real life problems.

- Focused and grounded research questions lead to more focused and grounded research results.

Phase 2: Case Analysis – Bringing the Research Question to available resources: Stories, Descriptive accounts, Interviews, Practices

- Key: Transparency and rigor, moving away from assertion or description to robust analysis.
- 'Show your work' and cite your sources.
- Our primary resource: stories (published and oral traditions)
- Our approach: Identifying and articulating legal principles and common themes by 'case-briefing' multiple stories and oral histories, from multiple sources, on a specific subject.

There was a question from the Committee about how to choose who to interview as a source for law. It was acknowledged that there are sometimes challenges within the community that might affect the reliability of some sources, but this is true in other areas as well. There was a further question concerning the level of community support for this methodology. Professor Friedland responded that there has been considerable support, with a great number of communities requesting that this process be used with their indigenous legal system. Each community gets control over their own report – in some cases they might have both a redacted public version as well as a confidential version. But if it is meant to be used as the First Nation's law, some measure of transparency is needed. In order to be subject to the law, all members of the community need to be able to have access.

Robert Janes added that many communities have secret societies that control their own codes. These typically require challenging protocols to enter the society.

Phase 3: Creating a Framework – Synthesis

- This phase is about organizing information and research results in an accessible, convenient form so that it can be more readily understood, analyzed and applied.
- Building a framework that can be continually built on.
- Tracks continuity, enduring debates and how the law moves.
- Crucial to develop this in conversation and collaboration within and between legal researchers and communities.

(a) Primer:

- Making some of the societal and historical 'background' explicit to the reader.
- Can't assume knowledge – within or across communities.

(b) Synthesis: The Analytical Framework

- Bringing all the strands together from the case analysis of stories (and/or other resources, e.g. interviews, ceremonies).
- Doing the 'hard work' of law in order to understand a specific area.
- Analogous to a legal memo in practice, or a law school exam outline or summary.
- Not about changing information, but organizing it in an accessible and convenient form.
- Can be readily accessed, understood and applied.
- Can be challenged, criticized, changed and built on.

(c) Preliminary Legal Theory:

- Bigger picture questions – how law works and how law is supposed to work.
- All legal traditions are both dynamic and bounded.
- Encourages us to constantly ask whether our understanding and articulation of any law remains responsive to and respectful of the integrity of the Indigenous legal tradition.

There was then some discussion regarding authoritative decision-makers – who is recognized to state or influence the law?
It was noted that there is an existing process within the court to assess the state of the common law, and get clarification from counsel if there are conflicting views (e.g., competing jurisprudence). Professor Friedland referred to an example of a law report using this methodology prepared for a community (The Accessing Justice and Reconciliation Project Short Summary of Legal Principles -- Legal Traditions: Coast Salish).

Phase 4: Implementation, Application and Critical Evaluation

- Applying the principles and procedures from the synthesis to current human and social issues, according to community goals.
- Feeding results and reflections back into the synthesis on an ongoing basis.
- Iterative process of application and evaluation, and change where necessary or desirable.

It was noted that there is a risk of some 'distortion' of indigenous law through this ILRU methodology, but this must be considered in the context of on-going distortion to indigenous law over the last 300 years due to other causes.

Professor Friedland then lead an exercise for participants to discuss ways to resolve a dispute with reliance on the summary of Coast Salish legal principles.

There was agreement that this was a very useful exercise to explore ways to engage indigenous law.

3. Federal Courts Rules / Act
Discussion of the Pros & Cons of special rules related to Aboriginal law proceedings: references (R153), assessors (R52 and R263)

Krista Robertson noted that we are past the "why" and now into the "how" stage of the discussion. One of the ideas was to rely on the Rules related to references as well as assessors. For example, if there is a custom election code, it could be challenging to adjudicate the content of the code in an adversarial court proceeding. These Rules could provide a tool to explore the scope and content of the indigenous law in a specific case to take it out of the adversarial context, which could otherwise be a distorting factor.

Paul Anderson asked whether the idea is to have something akin to an investigating 'magistrate' who could provide a report on the subject.

Robert Janes noted that this harkens back to the old assessor rule that allowed the court, in maritime law, to refer a question to an assessor who is a specialist in the field. The strategic issue is how we deal with indigenous law – the rules around assessors or references are tools that might be used. Given that for the foreseeable future there will not be an indigenous bench capable of adjudicating indigenous legal questions directly, it is preferable not simply to have a battle of experts.

Krista Robertson added that a referee could address a question of fact. If there is some agreement, we could create a framework that could be included in the guidelines.

CJ Crampton noted that the Rules could even be amended as necessary. It would be useful to have a better sense of what aspects of indigenous law we should be focusing on trying to make space for,

and then attempt to develop procedures. There are numerous issues on the horizon that we need to begin to work through.

Robert Janes suggested that the topic or issue is likely to arrive in an unpredictable manner. For example, in the *Enbridge* case, there might have been a dispute as to who has power to consent for the community. In other cases, there are issues related to the power to allocate land in a community, as well as child welfare disputes. It is difficult to predict where the question will first arise – in the past, there was simply a question of whether the First Nation had certain rights, whereas in the next 20 years it will start to turn on whether the rights are being exercised according to the First Nation's law.

Paul Anderson suggested that there is a need to have a more neutral process to determine the content of indigenous law.

Justice Shore noted that there is a need to ensure that judgments "stick," as well as the need for time-lines, which is one reason for some disputes arising over and over (e.g., governance disputes). For discussion at a future meeting.

Diane Soroka noted that one project is to get a 'handle' on indigenous law; another is to learn how to listen, how things may be presented in different ways (e.g., if you ask a question, you may be told a story – this is not an effort to be disingenuous, but simply a common way to provide a meaningful response).

Chief Justice Crampton encouraged further engagement with the Indigenous Bar Association and national leaders for the indigenous community.

Robert Janes suggested that if we ask people to fill in a blank page, there won't be a response, but if we come up with concrete recommendations for comment, then there will be a lot of comment. He proposed a number of tasks that seem relevant for the committee:

1. We want to discuss the approach to receiving indigenous law in Federal Court, with sub-issues:
    - identification of potential issues and where they may arise
    - review of guidelines for possible new content
    - analysis of existing rules for creative approaches
2. Develop a response to the TRC in the Federal Court process – which recommendations likely apply to or affect the Federal Court?
3. Develop an approach to chronic disputes, including:
    - earlier intervention
    - remedies/approaches that focus on the underlying dispute
4. Discuss issues arising from the *Daniels* case that may potentially become contentious before the Federal Court.

CJ Crampton welcomed the identification of these 4 good issues for follow-up discussion within each stakeholder group represented in this Committee.

Prothonotary Lafreniere asked each group to discuss the issues internally so that they can return ready to engage within the Committee. He noted that regarding repetitive band election disputes, the

litigation costs seem to come out of general band funds, often to the detriment of the wider community. A solution needs to be found to address this.

4. Discussion regarding Notice to the Profession (June 24, 2015) - Case management: Increased Proportionality in Complex Litigation before the Federal Court

Prothonotary Lafreniere noted that he brought the issues (which had been raised at the last meeting) to the chair of the case management working group. Regarding demonstrative evidence, there is no intention to prevent standard evidence in court. It is usually raised in IP cases as an issue to ensure that there is no surprise at trial. In terms of the number of trial days, there is always flexibility. If there are any specific amendments that are requested, these are welcome. If there is abuse in written interrogatories, this can be addressed.

Paul Anderson asked for feedback / examples from other members of the Bar regarding abuse of interrogatories in the context of Aboriginal law proceedings.

Sheldon Massie noted that there is positive feedback from DOJ on the Proportionality Notice.

5. Update: Seminar on Alternative Dispute Resolution
The Court is now at the end stage for planning this seminar on indigenous dispute resolution, which is scheduled to take place on November 18. Speakers include:

- Elder Peter Decontie
- Senator Murray Sinclair
- Professor Sarah Morales
- Michele Audette, Commissioner with the Commission of Inquiry for MMIWG
- John Beaucage, Yorkstreet Dispute Resolution
- Elder Stephen Augustine
- Members of the Federal Court

6. Aboriginal Law Practice Guidelines: public education
This is a follow-up item to ensure that the Guidelines are disseminated within the wider bar.

Paul Anderson noted that he is promoting the guidelines within the department. Also, the guidelines are expected to be included in the *Federal Courts Practice* text.

7. Varia
(a) Hospira Healthcare Corp. v. Kennedy Institute of Rheumatology, 2016 FCA 215
It was noted that there was a decision of a 5-member panel, which changes the approach to appeals of prothonotary Orders. Apparently, it is being appealed before the Supreme Court of Canada.

(b) Court modernization
The Chief Justice provided a brief overview of the Court's modernization initiatives.
Andrew Baumberg added that a key challenge relates to insufficient funding. It would be useful to better understand the priority that the Indigenous Bar places on court modernization (given all the other competing priorities).
Scott Robertston will bring it to the IBA executive as an access to justice initiative. Diane Soroka noted that the CBA will shortly be sending a letter to the government to encourage funding for court modernization.

(c) Records retention schedule (see draft Notice)
The draft Notice provides for retention of Court files according to a retention schedule. The Court cannot justify maintaining all documents in perpetuity – most are never used once the file is closed. The initial focus is on files that were not adjudicated on the merits (e.g., discontinued or abandoned).

Robert Janes indicated a preference to have notice if a file is dismissed due to failure to meet a deadline.

Prothonotary Lafreniere responded that for applications, if there is an excessive delay by a party, then there will be a status review notice from the court or else it will go into case management. Please provide feedback by early December.

(d) Discussion: non-adversarial adjudicative framework as an 'opt-in' alternative to the adversarial adjudicative model.
It was suggested that this be tabled for discussion at the next meeting, as it is relevant to the professors' presentation earlier today.

(e) First Nations Election Act
It appears that a first case has now been brought before the provincial court system. See article: *First Nations Elections Act being tested year after it came into effect* - http://leaderpost.com/news/local-news/the-first-nations-elections-act-being-tested-a-year-after-it-came-into-effect

(f) Spring 2017 Meeting
The CBA Spring conference is tentatively planned to start May 31, 2017, in Winnipeg.
Krista Robertson will review plans regarding the CBA conference and will circulate details in due course.