Building Relationships with Indigenous Peoples and Aboriginal Communities:

What the Duty to Consult and Accommodate means for Ontario Planners

Preface

The following learning module was developed from the work of Carolyn King* and David J. Stinson**. They have been collaborating since 2015 to educate land use planners and economic development officers on the necessity of consultation and accommodation. They were asked by the Ontario Professional Planners Institute (OPPI) to prepare a Continuous Professional Learning (CPL) course for the professional development of its members.

In this Continuous Professional Learning course, we will explore some of the worldviews, perspectives, communities and territories that belong to the First Peoples of this Land. This will provide a context for understanding the meaning of planning in the multi-jurisdictional place we call Canada and role of planners in the Duty to Consult and Accommodate.

In our live presentations, we start with a Welcome from an Elder. Like most meetings in most societies, gatherings of any significance start with a welcome. In the contexts we are studying here, that welcome often consists of a prayer, or ritual, or ceremony. The intention is to clear the mind and open the heart of personal concerns so that the important matters at hand can be dealt with in peace. It is not about the imposition of belief, but rather an invitation to participation. You are free to participate to whatever degree you are comfortable, without prejudice.

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Module VII – Consultation as Planning

During the inaugural address of the LaFontaine-Baldwin symposium in 2000, author John Ralston Saul stated that "The first measure of any citizen-based culture must not be its rhetoric or myths or leaders or laws but how few of its own citizens it kills." He asserted that "we have killed in political strife among ourselves less than a hundred citizens – most of them on a single day at Batoche", in what is present-day Saskatchewan during the 1885 Riel Rebellion. [i] Historian Walter Hildebrandt stated that: "Twenty-five Canadians — whites, Indians and Métis — died there between 9 and 12 May 1885. Over a thousand men fought on the usually peaceful Canadian prairie in the largest and longest battle ever to take place in the North-West." [ii]

This is reassuring in one sense, but in the context we are discussing here it must be pointed out, that the citizens killed by the young Dominion were Métis and their First Nation allies. The new order threatened their way of life. They had taken up arms against the government, because it instituted many land-use practices that they had not been consulted on.

This module examines the mixed history of consultation as a planning skill in Ontario. It reached a watershed moment with the tragedy at Ipperwash and the death of native protestor Dudley George. In the conclusion to the Ipperwash Inquiry report, former Chief Judge of the Ontario Court of Justice, Sidney B. Linden states that "Mr. George was the first Aboriginal person to be killed in a land-rights dispute in Canada since the 19th century" … reveal[ing] a deep schism in Canada's relationship with its Aboriginal peoples and was symbolic of a long and sad history of government policy that harmed their long-term interests… The Aboriginal occupation at Caledonia proves that Ipperwash was not an isolated event… There can be no reconciliation without truth. The truth must come out so that Aboriginal and non-Aboriginal Ontarians can move forward together to our collective future."

Teaching Moments for Ontario

Ipperwash Crisis. The basis for this common future goes back to the "1763 *Royal Proclamation* [which] established an "Indian country" … protected from encroachment or settlement… unless it was voluntarily ceded to the Crown… [the intent] was to impose the Crown between the settlers and the Indians in order to avoid exploitation. The fundamental commitment of the *Royal Proclamation* of 1763 was that First Nations were to be treated with honour and justice… Sir William Johnson [British Superintendent of Indian Affairs] … consummated the alliance with the Anishnabek by presenting two magnificent wampum belts, which embodied the promises contained in the Proclamation."

Unfortunately, the negotiations for the 1827 Huron Tract Treaty did not live up to this standard, leaving the First Nations inadequately compensated for the value of their lands. They retained only 1% of their original territory in the form of four small reserves. Even these parcels came under pressure. By 1912, federal Indian agents were pushing the communities to surrender more. Under the possible influence of bribery and fraud, part of the Kettle Point beachfront was lost in 1927, and all of the Stony Point beachfront was taken in 1928. Most of the land was sold off for three times what the communities received, with some reserved for public use. "Ipperwash Provincial Park was created out of these lands in 1936 after local residents agitated for an accessible beachfront… In 1942, the federal government appropriates the entire Stoney Point reserve in a manner unprecedented in Canadian history. The appropriation was contrary to the expressed wishes of the Kettle and Stoney Point Band. It also contravened the treaty obligations of the Crown and the procedures and principles the Crown was required to observe in its dealings with Aboriginal lands".

"First Nation soldiers from Stoney Point, returning from the War, were shocked to see their community destroyed. They were devastated to learn that the Canadian government had appropriated the reserve land, that their community no longer existed and the Stoney Point cemetery had been desecrated."

Though promised that the land would be returned when the government no longer needed it for military purposes, they held onto it for half a century. In the early 1970s, Minister of Indian Affairs, Jean Chrétien, attempted to return the land but the Department of National Defense would not budge. In 1990, however, they did allow a community member to be buried in the cemetery. By July of that year, active political protests began at Camp Ipperwash. "In 1993, exasperated with their failed attempts to have their reserve returned, people from Stoney Point decided to occupy the military range a Camp Ipperwash", and by 1995 had taken over the military barracks. At this point, DND withdrew its personnel and equipment to Base Borden. "For [the protestors], the occupation of Ipperwash Provincial Park in September 1995 was the natural next step…" [iii] [iv]

Unarmed, they reclaimed the Park on the 4th of September 1995. By the 5th, tactical units of the Ontario Provincial Police marched in. By the 6th, "One activist was shot and wounded, one was beaten until his heart stopped, and Anthony "Dudley" George was shot dead." [v]

The newly-elected government of Mike Harris adopted a wait-and-see stance during the summer. "However, although they were aware that there was the potential for an occupation, provincial government officials did not make sufficient efforts during this period to… defuse the growing tension and try to prevent the occupation in the first place. The provincial government could have appointed a mediator or tried to understand the historic grievances of the Stoney Point people, including the claims of an Aboriginal burial site in the park. It could have reached out to Stoney Point people, learned more about the dynamics within the community, or proactively identified potential mediators or facilitators."

Note: *What the Honourable Sidney Linden is proffering here are classic elements of "consultation"*

Once the protestors entered the Park, the government reacted swiftly. "Premier Harris believed that the occupation was a law enforcement issue, not a First Nation's matter… that the park belonged to the province… that the occupiers were trespassing… [t]he OPP's wish to pursue a go-slow approach contrasted with the government's desire for a quick end to the occupation… [t]he provincial government's priorities reflected its larger concerns about the potential *implications* of Ipperwash: … establishing a precedent for Oka-like occupations in the future… prov[ing] that it was tough on "lawbreakers" and that Aboriginal peoples would be treated the same as everyone else… not want[ing] a prolonged occupation to deflect it from its larger agenda." [vi]

Ipperwash Inquiry. "Questions surrounding Dudley's death and police actions rose almost immediately…", but an inquiry was only called in November of 2003, after the election of a new government, under Dalton McGinty. The commission began hearings in 2005, and spends "two years listening to 139 witnesses, 229 days of testimony and was presented with 23,000 documents." [vii] [viii]

The choice of a provincial judge was precedent setting, as typically a federal judge is selected for such inquiries. None-the-less, Linden rose to the occasion with remarkable wisdom. He ensured that all 27 parties to the hearing were treated with respect. Their testimony was heard, not only in the inquiry chambers, but through a live webcast of the proceedings. As a demonstration of fairness, he integrated the symbolic display

of "the provincial coat of arms and ceremonial flags [which] were very obvious and visible… [with] a number of aboriginal symbols and customs as well, such as smudging, drums, eagle feathers, talking sticks, elder prayers, and other ceremonies to which all of the parties were invited." [ix]

Commissioner Linden ended the inquiry with "an eloquent half-hour speech that all sides believed to be fair and reasonable." The report was tabled on the 30th of May 2007. He "found that the OPP, the provincial government led by Premier Mike Harris, and the federal government all bore responsibility for the events that led to George's death." [x]

It revealed signs of racial bigotry amongst police, systemic procrastination on the land file by the federal government, and a deficit of accountability from the provincial government; and made recommendations on how authorities could avoid future violence against Aboriginal activists. [xi]

Ipperwash Recommendations. Commissioner Linden stated that: "Aboriginal occupations and protests are not inevitable, nor are they inevitably violent." To prevent future violence, he felt that "[t]he provincial government and other institutions must redouble their efforts to build successful peaceful relations with Aboriginal peoples in Ontario so that we can all live together peacefully and productively… [w]e must move beyond conflict resolution by crisis management… inaction will only increase the considerable tensions that already exist between Aboriginal and non-Aboriginal citizens in this province."

At the time of the report's release, he felt that his research indicated that "flashpoints" were "very likely as intense today as they were during Ipperwash, Oka, Burnt Church, or Gustafesn Lake." For those of us who are professionally committed to land-use planning, Linden instructed that though "… the immediate catalyst for most major occupations and protests is a dispute over a land claim, a burial site, resource development, or harvesting, hunting, and fishing rights. The fundamental conflict, however, is about land… the control, use, and ownership of land." [xii]

The final report made 98 recommendations. Among them was an apology by the federal government, the return of Camp Ipperwash, compensation to the Kettle and Stoney Point First Nation, and that they should generally assume responsibility for negotiations when land claims are at stake.

For Ontario, there was a more extensive list. Many had to do with policing matters, peacekeeping during protests, dealing with cultural insensitivity, ministerial accountability, public education and community information about significant Aboriginal protests, development of First Nation police forces, etc. Some of the more salient suggestions for our current discussion are as follows:

- a Treaty Commission
- respect and understanding of the duty to consult and accommodate within relevant provincial agencies and Ontario municipalities
- develop co-management arrangements and resource-sharing initiatives
- acknowledge the uniqueness of Aboriginal burial and heritage sites
- clarify the meaning of "Aboriginal values" in all Class EA documents
- encourage municipalities to develop and use archaeological master plans
- promote general public education about treaties in Ontario
- promote more Aboriginal perspectives and content in the elementary and secondary school curricula
- create a Ministry of Aboriginal Affairs
- establish the Ontario Aboriginal Reconciliation Fund

- create mechanisms for obtaining input from Aboriginal communities on planning, policy, legislation, and programs affecting Aboriginal interests

These benchmarks for the development of a renewed relationship, between the original peoples of Ontario and its newcomers, place planning at the heart of this revitalisation. [xiii] [xiv] [xv] [xvi] [xvii] [xviii] [xix] [xx]

Caledonia Land Dispute. Even while the Ipperwash Inquiry was in full swing, a municipal planning decision set the stage for further conflict. The property involved was the subject of a land claim, as it was part of the Haldimand Tract granted to Six Nations by the Crown in 1784. In 2006, Haldimand County grants approval for the construction of homes on a 40-hectare property in the town of Caledonia. "Tension around the development began when a group of women from the First Nation sought to bring attention to the issue by occupying the development site and reclaiming the land." [xxi]

Caledonia Outcome. In an effort to learn from the Ipperwash Crisis, the OPP are deployed to patrol and monitor, but no tactical unit is sent in. In an effort to learn from the Oka debacle, the Ontario government of Premier Dalton McGinty purchases the property to resolve the crisis. However, as of 2020, the actual issue of the land has not been resolved. "This event is remembered for clashes between protestors, Caledonia residents, and the police… [t]he media portray[ing] such conflict as symptomatic of a problem of law and order…" Yet what is overlooked are "the ways that government action, including planning processes, might have contributed to creating such situations." [xxii]

Hiawatha Case. During this same time period the relative peace of a court case brought clarity, if not closure, to this issue. The seven Williams Treaty First Nations: Hiawatha, Alderville, Beausoleil, Georgia Island, Rama, Curve Lake, and Scugog Island went to court over the Seaton Lands development in the Hiawatha *First Nation v. Ontario, 2007* case. It was triggered by the transfer of environmentally sensitive areas of the Oak Ridges Moraine for developable parcels of the Seaton lands near Pickering. It dealt with respect for burial sites, an Aboriginal right. Since Iroquois, Huron-Wendat, and Anishnaabeg had all occupied this territory there was concern whether all possible First Nations were properly consulted. The court used Aboriginal, historical, legislative, and constitutional evidence and ruled that the Crown was not obliged to consult with the appellant Anishnaabeg communities due to the fact, among others, that these First Nations surrender these lands in the Williams Treaty of 1923.

However, the court did elaborate on the statutory "duty to consult". It left firmly in place legal obligations, as found in such legislation as:

- the Environmental Assessment Act
- the Planning Act
- the Cemeteries Act [xxiii] [xxiv]

At the time of this case, these communities had been in long-standing negotiations with the federal and provincial governments over the injustice of this Treaty. The inadequacy of its provisions reflected the notion that Aboriginal identity was unimportant, making consultation moot. Court cases often instantiate legal principles; they do not always layout courses of action. This one underscored the issues that erupted at Caledonia while undergirding the recommendations of Ipperwash.

Note: *in 2018 the Williams Treaty Claims Settlement was signed by the Nations and the Crown in view of provincial and municipal officials. Built on formal apologies from both the feds and province, they contributed $1.1 billion in compensation.* [xxv]

Ontario Guidelines

The policy vacuum created by court cases that insist the Honour of the Crown be upheld through Consultation and Accommodation can be challenging for those tasked with doing it. An example is the *Draft Guidelines for Ministries on Consultation with Aboriginal Peoples Related to Aboriginal and Treaty Rights (Ontario Guidelines)* released in June 2006. "The Métis Nation and First Nations had not been consulted on the *Ontario Guidelines* prior to their release. Consequently, Métis and First Nation groups rejected the *Ontario Guidelines* largely based on the absolute discretion they put into the hands of individual ministries to determine the Crown's obligations owing to Aboriginal groups. In May 2007, in the Ipperwash Inquiry Report, Justice Sidney B. Linden echoed similar concerns with respect to the *Ontario Guidelines*: 'My concern is that the draft guidelines appear to direct government ministries to decide, unilaterally, whether a particular project might have an impact on Aboriginal or treaty rights and thus trigger the duty to consult'…" [xxvi]

Saugeen Ojibway Nation. Though the Ontario Guidelines were withdrawn to be rewritten in collaboration with the Métis Nation of Ontario and Chiefs of Ontario, they still exist in draft form. Their inadequacy was revealed when the Saugeen First Nation and Chippewas of Nawash Unceded First Nation (collectively – SON) went to court over a quarry license in the *Saugeen First Nation and Chippewas of Nawash Unceded First Nation v. Ontario Minister of Natural Resources and Forestry and T & P Hayes Ltd., 2017* case. The government (MNRF) had predetermined its response to SON and ignored their consultation requirements when issuing a private company, a licence to mine limestone in SON's traditional territory.

The Court addressed several matters vital to First Nations who seek to protect their rights to be adequately consulted and accommodated:

- There needs to be a clear and coherent process
- First Nations often receive countless requests for consultation, and the demands of participating can strain its ability to provide other necessary community services
- Third parties have no obligation to consult, but they risk delays if they don't
- First Nations should not have to pay for the Crown to fulfil its constitutional obligations
- Funding from the Crown &/or proponent is reasonable when a project does not benefit the First Nation financially
- Cumulative effects are the purview of consultation, even without a statutory requirement
- Therefore, **capacity** and **funding** to **participate in consultation** may be necessary, including legal costs and peer reviews [xxvii]

"With the growing number of court decisions enforcing the duty, and the uncertainty, regulatory delays and economic costs that ignoring the duty can have… all levels of government in Canada have increasingly been trying to come to grips with… its constitutional, legal, procedural and on-the-ground implications. Some of this work has been done in collaboration with Aboriginal peoples. However, in many situations, this work has been done in isolation by governments… with the justification that, since it is the Crown which has the duty, it is the Crown's responsibility to decide how it will discharge its duty. This type of government response flies in the face of the very purpose of the duty as a means to promote negotiations, settlements, accommodations and reconciliation." [xxviii]

Ontario Legislation

The land-use regime in Ontario has increasingly cited Section 35 of the *Constitution Act, 1982*. Statutory references can be found in such legislation "… as the *Mining Act* (1990), the *Clean Energy Act* (2006), the *Endangered Species Act* (2007), and the *Provincial Parks and Conservation Reserves Act* (2007), and the *Far North Act*

(2010) …" By doing so, they "acknowledge that existing Treaty and Indigenous rights… cannot be infringed upon or abolished in the interpretation or implementation of said policies." [xxix] [xxx]

Far North Act. The *Far North Act, 2010* presents a transitional study in contrasts. On one hand it both recognises Section 35 and "provides for First Nations approval of land use planning". On the other, it was universally opposed by affected First Nations on the grounds of inadequate: consultation, resourcing, power-sharing, recognition of jurisdiction, and protection of inherent rights from land-use planning. [xxxi] [xxxii]

Planning Act. By contrast is the *Planning Act, 1990*, which neither admits Section 35 rights "… to inform and contribute to decision-making that impacts… traditional territories", nor concedes approval authority beyond "… that [of] municipalities… notify[ing] First Nations of development occurring within 1 km of a reserve." It does list them as "a 'public body' similar to other public actors including municipalities, departments, commissions, and officials of the province and federal government." However, by leaving the content, method, and timing of engagement to the discretion of the Minister, it demeans their position from that of a rights-holder to that of a mere stakeholder. [xxxiii] [xxxiv]

Ontario Planning Reform. In 1993, the government of Bob Rae established a commission to reform planning in Ontario. They took the time to consult with First Nations concerned about the role of Aboriginal interests in the planning process. They made several recommendations, perhaps the most significant of which, was that First Nations be treated as governments; not "a special-interest group, stakeholders, or third parties". They advised that a process for consultation should be developed, as well as the creation of protocols for mutual dialogue between First nations and municipalities. The commission also felt that Joint Planning processes were to be initiated. None of this was incorporated into Ontario's planning framework.[xxxv]

Provincial Policy Statement

2005. Though superseded twice, this version of the policy statement is the most widely cited in Ontario official plans. Thirty-four percent refer to it, while only thirty-two percent refer to the 2014 rendition. The 2005 PPS makes no mention of Aboriginal Communities, Indigenous Rights, or Native Perspectives.[xxxvi]

2014. Where Ontario has recognised Section 35, *Constitution Act, 1982,* is in the ***Provincial Policy Statement***. The revised the PPS was unveiled by the government of Premier Kathleen Wynn on the 30th of April 2014. This concession was granted at the behest of representatives from Walpole Island First Nation (Jared Macbeth) and Mississaugas of the New Credit First Nation (Carolyn King) in meetings with the Ministry of Municipal Affairs and Housing during the mandated 5-year review of the PPS. They were part of a University (Queens & Waterloo) research team that also made deputations to the public review hearings. The new policy, for the first time, encouraged municipalities to co-ordinate planning with Aboriginal communities, and to consider their interests in conserving cultural, heritage, and archeological resources. [xxxvii] [xxxviii]

According to Heather Dorries, the PPS did not create a new set of rights. "Rather, it directs planners to take already existing rights into consideration in the planning process. For too long, acknowledgement of the existence of Aboriginal peoples or the fact that Ontario occupies the traditional territories of Aboriginal peoples has been absent from Ontario's planning framework. The introduction of language on Aboriginal and treaty rights is a reminder of the treaties which are the basis for relationships between Aboriginal peoples and Canada, and which outline the obligations of the government towards Aboriginal peoples." [xxxix] Though

released under the *Planning Act,* it is not itself a piece of legislation and therefore has no regulations to back it up. In short, it requests that municipalities be aware of their Aboriginal neighbours. [xl]

But as such, it is a vital early step. The participants who pushed for these initial word changes were not merely seeking the protection of "rights and interests" but were also hoping for an "… increasing awareness among planners regarding the need for and the benefits of building positive relationships… that it is good policy and practice, not simply a duty, to do so." [xli]

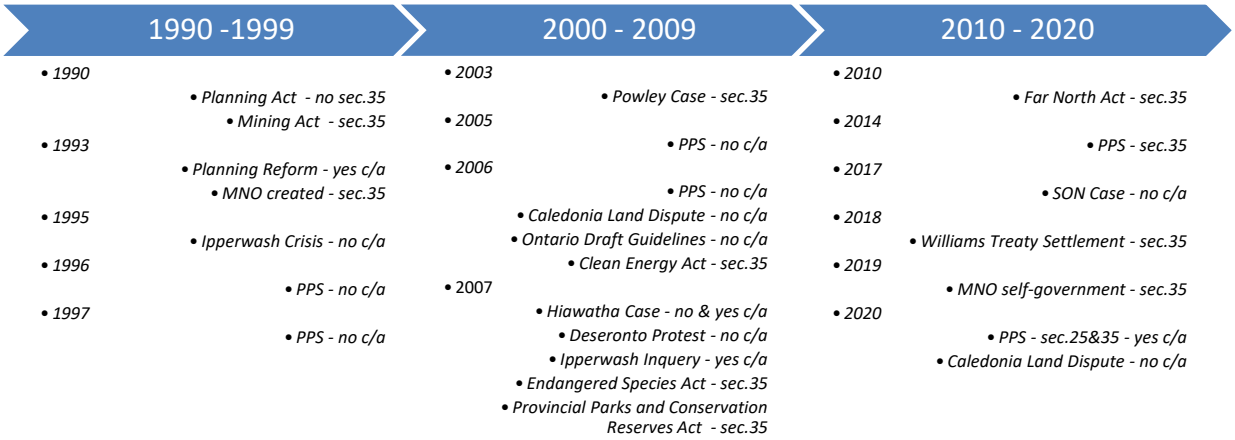
2020. The new ***Provincial Policy Statement***, released by the Doug Ford government on the 1st of May 2020, goes even further. The language is much more imperative, and envisions a unique role in land-use planning for indigenous perspectives and the traditional knowledge of Aboriginal communities. Planners are encouraged to facilitate a sharing of knowledge that will inform their decision-making about land *(Part IV: Vision)*. They are specifically instructed to co-ordinate land use matters through the proper engagement of indigenous communities *(1.2 Coordination)*. The directive to build constructive and co-operative relationships is significant given the Policy's acknowledgement that protecting the province's natural heritage & biodiversity, water & Great lakes, agricultural, mineral, and cultural heritage & archaeological resources, is vital for the economic, environmental, and social health of all Ontarians, regardless of who they are *(2.0 Wise Use)*. Engagement is also stipulated for the identification, protection, and management of cultural heritage and archaeological resources *(2.6 Cultural Heritage and Archaeology)*. The *PPS, 2020* references both Section 25 & Section 35 of the *Constitution Act, 1982* and insists on long-term, comprehensive, up-to-date official plans that integrate with Environmental Assessment processes. Planners will also have to monitor and report on their PPS implementation efforts. These will be according to evaluation criteria consulted upon with municipalities, public bodies, stakeholders, and Indigenous Communities *(4.0 Implementation)*. [xlii]

Note: *Though the advancements of the new PPS are to be welcomed, they do represent a challenge for both First Nations and their municipal neighbours. Taking steps to fulfill its vision and implement its objectives place a burden on municipalities. But this is already the case for Aboriginal communities. Creating the capacity needed to adequately address issues of consultation and accommodation is a long-standing issue. Its efficacy still varies widely. The collaboration implied in the PPS will stretch this capacity even further. This challenge will encompass a need for training, which will require both time and funding for everyone involved.*[xliii]

First 30 Years of C&A. The first substantiation of the Duty to Consult was the court case brought by Ron Sparrow of the B.C. Musqueam Indian Band in 1990, where his fishing rights had been quashed without consultation. It was over shadowed though by the Oka Crisis in Quebec, sparked by a municipal expansion of a golf course onto a commons area and burial ground used by the Mohawk community of Kanesatake. That same year, the Ontario government revamped the Planning Act. It made no mention of the constitutional rights of Aboriginal Peoples (Sec. 35), though the Mining Act of that year did. Subsequent Ontario legislation has continued to do so. Substantive planning reforms were soon proposed to align Ontario's planning interests with those of Aboriginal communities via consultation. These were never implemented. Shortly thereafter, the Ipperwash Crisis occurred over the failure to return land confiscated from the Kettle and Stony Point First Nation. The resulting Inquiry called for better consultation. Even still, successive Provincial Policy Statements made no reference to the need for consultation, let alone accommodation. The Caledonia Land Dispute was an inevitable outcome due to a proposed housing development on land claimed by members of the Six Nations. Government guidelines on consultation were drawn up, but without any consultation, and thus rejected by the communities. The Hiawatha court case highlighted the weaknesses of the Williams Treaty when it was used to quashed the Duty to Consult with

regards to the development of environmentally sensitive areas near burial sites on the Oak Ridges Moraine. None-the-less, the legislative obligations to consult were upheld. The previous version of the PPS finally acknowledged the constitutional rights of Aboriginal communities and suggested cooperation with them, but the Saugeen Ojibway Nation court case over a quarry license showed how tenuous this could be. The recent PPS has finally given full recognition of constitutional rights (Sec. 25 & 35) and directives to engage with indigenous communities. Over this time period, Métis rights in Ontario have also slowly evolved to the point of official policy recognition and self-governance. Most recently, the federal government has promised to embed the principles of the United Nations Declaration of the Rights of Indigenous Peoples into Canadian law. The past thirty years have seen fits and starts, with occasional regressions into violence. However, the trajectory has led to a modest recognition of a priori rights. Hopefully, this will be a basis for an increased understanding and the rebuilding of relationships over the next thirty years.

Ontario's Record:



c/a = consultation & accommodation; sec.35 = rights enshrined in Section 35 of the Constitution Act, 1982

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[i] *His Excellency John Ralston Saul. Inaugural LaFontaine-Baldwin Lecture. Royal Ontario Museum, Toronto, Ontario. Thursday, March 23, 2000 [https://archive.gg.ca/media/doc.asp?lang=e&DocID=1374] 19 June 2020*

[ii] *Walter Hildebrandt. 1985. The Battle of Batoche: British Small Warfare and the Entrenched Métis. Canadian Parks Service, Environment Canada, Minister of Supply and Services Canada. Ottawa, Ontario.*

[iii] *Honourable Sidney B. Linden. 2007. Ipperwash Inquiry. Government of Ontario*

[iv] *Ontario Court of Justice: A History, final draft as of October 2, 2015 [http://www.ontariocourts.ca/ocjhistory/wp-content/uploads/history-project-book.pdf] 9 July 2019*

[v] *Dudley George and the Ipperwash Activists. APTN National News. [https://aptnnews.ca/aboriginal-history-month/dudley-george-and-the-ipperwash-activists/] 10 July 2019*

[vi] *Honourable Sidney B. Linden. 2007. Ipperwash Inquiry. Government of Ontario*

[vii] *Ontario Court of Justice: A History, final draft as of October 2, 2015 [http://www.ontariocourts.ca/ocjhistory/wp-content/uploads/history-project-book.pdf] 9 July 2019*

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[xi] *Dudley George and the Ipperwash Activists. APTN National News. [https://aptnnews.ca/aboriginal-history-month/dudley-george-and-the-ipperwash-activists/] 10 July 2019*

[xii] *Honourable Sidney B. Linden. 2007. Ipperwash Inquiry. Government of Ontario*

[xiii] *Heather Dorries. 2014. Aboriginal Rights Brought to the Provincial Table: Ontario's New Provincial Policy Statement. Plan Canada. 54 (2) p. 42-45, Summer 2014. Canadian Institute of Canada. Ottawa, Ontario*

[xiv] *Ipperwash Inquiry. RECOMMENDATIONS: VOLUME 2 [https://www.attorneygeneral.jus.gov.on.ca/inquiries/ipperwash/report/vol_4/pdf/E_Vol_4_B_Policy.pdf] 11 July 2019*

[xv] *[https://en.wikipedia.org/wiki/Ipperwash_Crisis] 30 May 2019*

[xvi] *[https://en.wikipedia.org/wiki/Ipperwash_Inquiry] 30 May 2019*

[xvii] *[https://en.wikipedia.org/wiki/Ipperwash_Provincial_Park] 30 May 2019*

[xviii] *Honourable Sidney B. Linden. 2007. Ipperwash Inquiry. Government of Ontario*

[xix] *Ontario Court of Justice: A History, final draft as of October 2, 2015 [http://www.ontariocourts.ca/ocjhistory/wp-content/uploads/history-project-book.pdf] 9 July 2019*

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[xxii] *Heather Dorries. 2014. Aboriginal Rights Brought to the Provincial Table: Ontario's New Provincial Policy Statement. Plan Canada. 54 (2) p. 42-45, Summer 2014. Canadian Institute of Canada. Ottawa, Ontario*

[xxiii] *Cowan, Jeff. 2007. "Duty to Consult". First Nation Consultation and Archaeology seminar. 16 February 2007. Ontario Professional Planners Institute. Barrie, Ontario*

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[xxv] *[https://www.orilliamatters.com/local-news/historic-11-b-williams-treaty-signed-in-rama-1126023] 7 January 2020*

[xxvi] *Métis Nation of Ontario. 2008. Towards a Consultation Framework for Ontario Métis -- 2007/08 Community Consultations What We Heard Report*

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