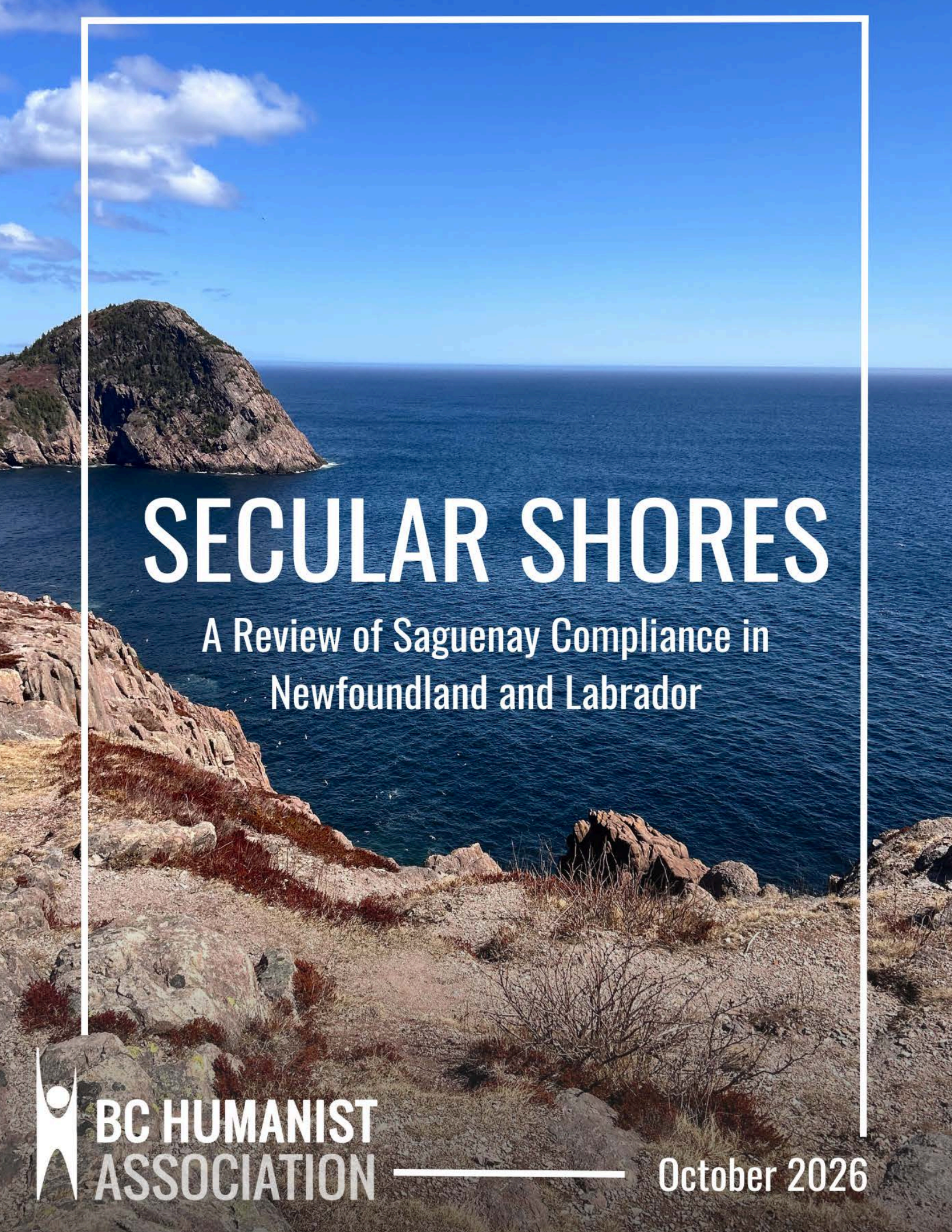




SECULAR SHORES

A Review of Saguenay Compliance in
Newfoundland and Labrador



BC HUMANIST
ASSOCIATION

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This report is available free of charge at
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ABOUT THE BC HUMANIST ASSOCIATION

Since 1984, the British Columbia Humanist Association has provided a community and a voice for Humanists, atheists, agnostics and the non-religious in BC. Humanism is a worldview that promotes human dignity without belief in a higher power. We are a registered charitable organization that promotes progressive and secular values and challenges religious privilege.

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ACKNOWLEDGEMENTS

This report was produced on the unceded and traditional territories of the xwməθkwəyəm and kwikwəḷəm peoples, and the W̱SÁNEĆ and ləkʷəŋən-speaking peoples, and the Beothuk, Mi'kmaq, Innu, and Inuit of Newfoundland and Labrador.

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ABSTRACT

This report examines the inclusion of prayers in municipal council meetings in Newfoundland and Labrador, Canada, and compliance with the Supreme Court of Canada's 2015 ruling in *Mouvement laïque québécois v. Saguenay (Saguenay)*. That decision found the practice of opening council meetings with a prayer unconstitutional. A detailed survey of the agendas, minutes, and video recordings of the meetings of Newfoundland and Labrador municipalities with populations over 1,000 revealed no ongoing unconstitutional prayers. Despite being Canada's most religious province by measure of religious affiliations, Newfoundland and Labrador is the most secular province we have analyzed to date, with no prayers identified in any contemporary regular and inaugural council meetings.¹ In examining meetings post *Saguenay*, we identified instances of secular minutes of silence in regular municipal council meetings in Bishop's Falls, and an opening prayer in the 2021 inaugural meeting of the Town of Bonavista, which has since ceased this practice. We also highlight the inclusion of Indigenous content in council meetings and the need for municipalities to avoid prescriptive invitations to Indigenous representatives.

The report's principal recommendation is that local governments continue to keep prayer out of council meetings, as the Supreme Court requires. Doing so upholds their duty of religious neutrality and ensures that everyone is welcome, regardless of their faith or lack thereof.

¹ Statistics Canada. (2022, October 26). *The Canadian census: A rich portrait of the country's religious and ethnocultural diversity* [Map]. Government of Canada. Available at <https://www150.statcan.gc.ca/n1/daily-quotidien/221026/mc-b001-eng.htm>

THE SAGUENAY PROJECT

The *Saguenay Project* is an ongoing research and advocacy campaign by the BC Humanist Association to audit and promote compliance with the 2015 Supreme Court of Canada decision in *MLQ v Saguenay*.²

Report	Province	Date	Regular prayers	Inaugural prayers
Duty of Neutrality Beyond Saguenay	BC	Nov 2020	0/162	23/162
In Open Defiance	MB	Mar 2022	4/101	6/101
Open for Unconstitutional Business	ON	Dec 2022	9/360	156/328
We Yelled at Them Until They Stopped	BC	Nov 2023	0/161	7/148
The Last Municipality Standing	AB	May 2024	6/177	6/172
An Impossible Task	SK	Oct 2024	2/95	3/90
Prayer Free BC	BC	Apr 2025	0/160	8/160
The Island Anomaly	PEI	Sept 2025	0/14	1/6
Godless Serenity	NB	May 2026	4/68	6/54
Amen, Again!	ON	Sep 2026	2/359	62/356

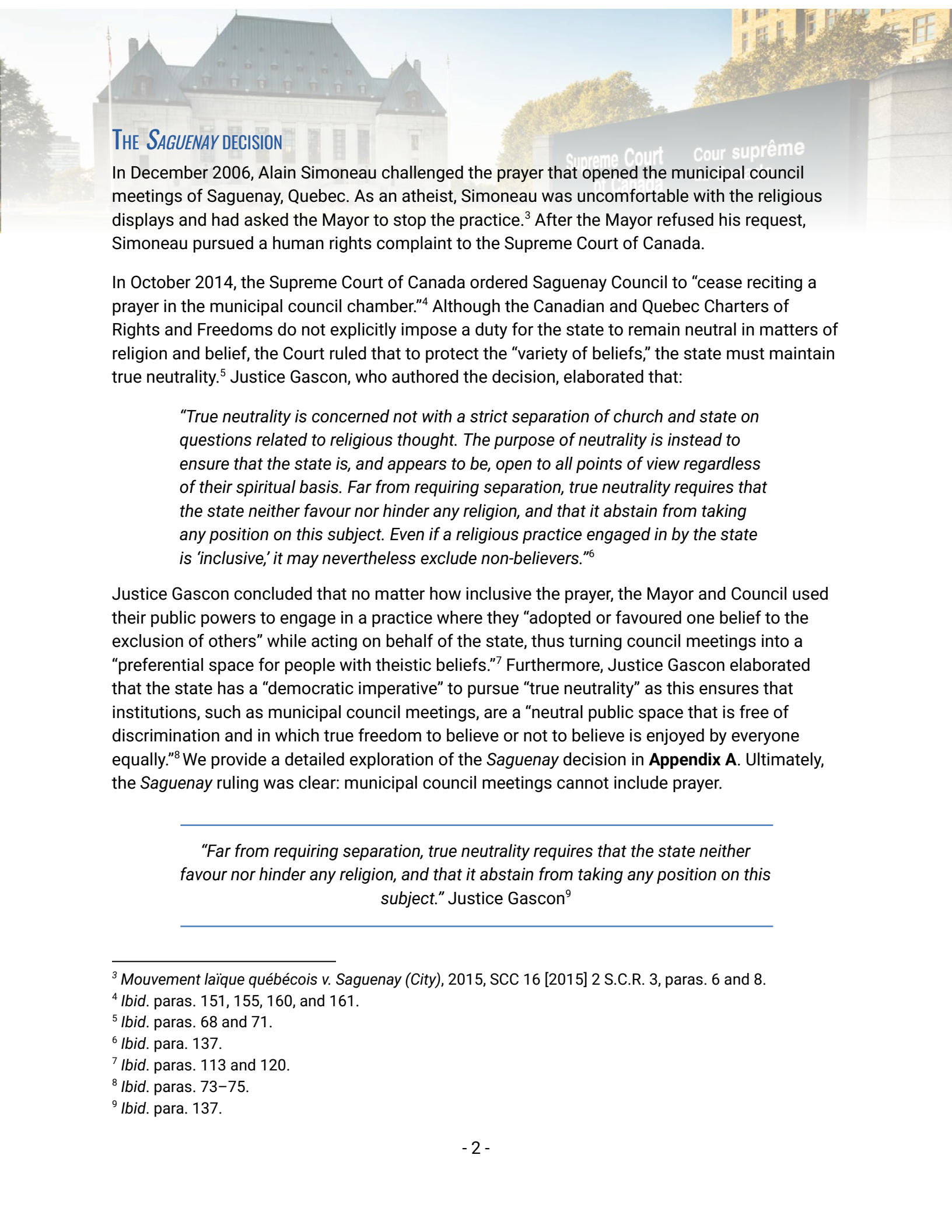
This report, the eleventh in our series, builds on and borrows from these previous reports. While our study of municipalities across the country is ongoing, several emerging trends can be identified: (1) The number of municipalities including prayer in their meetings (regular or inaugural) has steadily declined since *Saguenay*. Some municipalities responded to the ruling by changing their practices: sometimes abolishing the practice altogether, other times altering or adjusting their procedures. (2) Despite this reduction, prayer continues to be included in some municipal council meetings across the country. (3) These prayers are disproportionately delivered by Christian men. (4) Advocacy works, and more advocacy is needed.

The *Saguenay Project* seeks to highlight violations of *Saguenay* to increase compliance with the ruling, thereby strengthening the separation of religion and government in Canada and ensuring that all feel welcome in municipal council chambers across the country.

² Learn more and find links to all our report at <https://www.bchumanist.ca/saguenay>

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THE SAGUENAY DECISION

In December 2006, Alain Simoneau challenged the prayer that opened the municipal council meetings of Saguenay, Quebec. As an atheist, Simoneau was uncomfortable with the religious displays and had asked the Mayor to stop the practice.³ After the Mayor refused his request, Simoneau pursued a human rights complaint to the Supreme Court of Canada.

In October 2014, the Supreme Court of Canada ordered Saguenay Council to “cease reciting a prayer in the municipal council chamber.”⁴ Although the Canadian and Quebec Charters of Rights and Freedoms do not explicitly impose a duty for the state to remain neutral in matters of religion and belief, the Court ruled that to protect the “variety of beliefs,” the state must maintain true neutrality.⁵ Justice Gascon, who authored the decision, elaborated that:

“True neutrality is concerned not with a strict separation of church and state on questions related to religious thought. The purpose of neutrality is instead to ensure that the state is, and appears to be, open to all points of view regardless of their spiritual basis. Far from requiring separation, true neutrality requires that the state neither favour nor hinder any religion, and that it abstain from taking any position on this subject. Even if a religious practice engaged in by the state is ‘inclusive,’ it may nevertheless exclude non-believers.”⁶

Justice Gascon concluded that no matter how inclusive the prayer, the Mayor and Council used their public powers to engage in a practice where they “adopted or favoured one belief to the exclusion of others” while acting on behalf of the state, thus turning council meetings into a “preferential space for people with theistic beliefs.”⁷ Furthermore, Justice Gascon elaborated that the state has a “democratic imperative” to pursue “true neutrality” as this ensures that institutions, such as municipal council meetings, are a “neutral public space that is free of discrimination and in which true freedom to believe or not to believe is enjoyed by everyone equally.”⁸ We provide a detailed exploration of the *Saguenay* decision in **Appendix A**. Ultimately, the *Saguenay* ruling was clear: municipal council meetings cannot include prayer.

“Far from requiring separation, true neutrality requires that the state neither favour nor hinder any religion, and that it abstain from taking any position on this subject.” Justice Gascon⁹

³ *Mouvement laïque québécois v. Saguenay (City)*, 2015, SCC 16 [2015] 2 S.C.R. 3, paras. 6 and 8.

⁴ *Ibid.* paras. 151, 155, 160, and 161.

⁵ *Ibid.* paras. 68 and 71.

⁶ *Ibid.* para. 137.

⁷ *Ibid.* paras. 113 and 120.

⁸ *Ibid.* paras. 73–75.

⁹ *Ibid.* para. 137.

METHODS

Following our previous reports, we have restricted our survey to municipalities with populations equal to or greater than 1,000 according to the 2016 Census.¹⁰ The municipality of Nain was also excluded from this analysis because it operates within the distinct legal and governance framework of the Nunatsiavut Inuit self-government region.¹¹ Nain is the administrative capital of the Nunatsiavut government; municipal governance in Nain exists alongside Indigenous self-government established under the Labrador Inuit Land Claims Agreement.¹² Because this makes the context of governance in Nain substantially different from the other municipalities governed solely under Newfoundland and Labrador's municipal legislative framework, its inclusion would reduce comparability across the sample.

In our previous reports, we have typically distinguished between two types of meetings: regular and inaugural meetings. Regular meetings are normal business meetings, defined by the *Towns and Local Service Districts Act*.¹³ Inaugurals are the first meeting of a newly constituted council following an election, which typically includes a swearing-in ceremony and other ceremonial elements. Whereas in many municipalities in other provinces, the swearing-in ceremony was frequently held in conjunction with the first meeting of council, this was far less common in Newfoundland and Labrador. Most municipalities in our dataset held a standalone swearing-in ceremony. These ceremonies must take place within two weeks of the election and before a mayor or councillor begins their official duties.¹⁴ The first meeting of these councils, following an election, was typically unremarkable compared to other regular meetings of council. As such, for the present study we will consider the swearing-in ceremonies and draw comparisons with the inaugural meetings of other provinces.

For each municipality, members of our research team visited the municipal website and located the minutes and, where possible, the agendas and an audio/video recording of the swearing-in ceremonies.¹⁵ Where available, minutes of meetings that occurred before *Saguenay* were also inspected. When records were not available for swearing-in ceremonies on a municipal website,

¹⁰ Population data based on: Statistics Canada. (2017). "Population and dwelling counts, for Canada, provinces and territories, and census subdivisions (municipalities), 2016 and 2011 censuses (table)." Population and Dwelling Count Highlight Tables. 2016 Census. Statistics Canada Catalogue no. 98-402-X2016001. Ottawa. Released February 8, 2017. Available at <https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/hltfst/pd-pl/Table.cfm?Lang=Eng&T=302&SR=1&S=86&O=A&RPP=25>

¹¹ Nunatsiavut Government. (n.d.). *Nain. Imappivut: Nunatsiavut Marine Plan*. Available at <https://imappivut.com/communities/nain/>

¹² Nunatsiavut Government. (n.d.). *Path to self-government*. Available at <https://nunatsiavut.com/path-to-self-government/>

¹³ SNL 2023, c T-6.2.

¹⁴ Government of Newfoundland and Labrador, Department of Municipal Affairs and Community Engagement. (2025). "2025 election FAQs" [PDF]. Available at <https://www.gov.nl.ca/mca/files/2025-Election-FAQs.docx.pdf>

¹⁵ To ensure that a consistent timeframe is studied, we used the first meeting that occurred after three randomly selected dates: September 28, 2021, April 12, 2023, and September 12, 2024.

our team also reviewed the municipality's social media channels, primarily YouTube and Facebook, for agendas, invitations, or recordings.

As with our previous studies, our team reviewed all available records to verify whether the meeting included a prayer, invocation, moment of silence, Indigenous content, or other ritual practice to mark the start of a meeting. We noted those municipalities that included a prayer in their meeting, along with the name, affiliation and gender of the person who delivered the prayer, when available.¹⁶ We transcribed any prayers and noted procedures and practices surrounding them, such as recording gestures made by speakers, whether the task rotated among council members, whether a guest delivered the prayer, or whether audio/visual recordings were paused during the delivery.

Where we were unable to find publicly accessible records, we emailed and called the city's administrator for further records or clarification if swearing-in ceremonies or regular meetings included a prayer and/or land acknowledgement. Despite our searches and outreach, we were unable to find any data at all for St. Anthony, Humber Arm South or Upper Island Cove. And we have incomplete data for Stephenville, Burin, Gambo and Burgeo.

While we did not classify them as prayers, we reviewed materials and noted the inclusion of moments of silence and Indigenous content, such as land or territorial acknowledgements. This was done to better understand the extent to which these elements are featured in municipal council meetings. We were particularly interested in Indigenous content – while largely symbolic, these elements can further the goal of reconciliation, and we see a benefit to contributing this data to the literature.

¹⁶ We made efforts to identify the individual's gender identity via publicly available information, i.e. pronoun use in church websites, media reports, blogs, etc. where possible.



QUANTIFYING PRAYER PRACTICES

Pre-Saguenay

In each of our provincial studies, we have attempted to compare municipal practices before and after the April 15, 2015, *Saguenay* decision, to better understand the impact of the decision. We have found that many Canadian municipalities changed their practices almost immediately following the ruling, particularly in regular council meetings. Unfortunately, consistently available data across similar date ranges in Newfoundland and Labrador were not available for the pre-*Saguenay* period.

What was found, in an examination of available municipal data from a variety of date ranges, was consistent with the findings of the report overall: most municipalities had no prayer prior to *Saguenay*. The one notable exception was the town of Bishop's Falls, which conducted an "opening prayer in the form of silent reflection."¹⁷

The fact that the only pre-*Saguenay* practice we found across all of the municipalities studied was a moment of silent reflection/ prayer, rather than a spoken prayer, is quite remarkable. Most other provinces we have studied to date have seen a decrease over time, but all had examples of local governments that routinely included prayers in their meetings prior to the ruling, which were found with our method. As an example, in Manitoba, 14 municipalities included prayers in their 2014 inaugural council meeting, which decreased to nine in 2018 and six in 2022.¹⁸ Without further research, we cannot say what has driven this difference. There may be something unique to the municipal political culture of Newfoundland and Labrador, or maybe religion has played a more private role in the province.¹⁹

Contemporary Swearing-In Ceremonies

We reviewed available data for the 2021 and 2025 swearing-in ceremonies for the 62 municipalities in Newfoundland and Labrador with a population of 1,000 or more. One municipality, Bonavista, included a prayer at its 2021 inaugural meeting, and we could not find data for seven municipalities.²⁰

In Newfoundland and Labrador, municipal councillors can be sworn in before the returning officer, clerk, provincial court judge, justice of the peace, or commissioner of oaths.²¹ Few videos

¹⁷ Town of Bishop's Falls. (2010, August 17). Regular public council meeting no. 1272 [Meeting minutes]. <https://www.bishopsfalls.ca/common/pages/GetFile.ashx?key=YGS%2fACCb>

¹⁸ Phelps Bondaroff, T., Thom, A., Prasad, R., & Bushfield, I. (2022 March). "In open defiance: Unconstitutional prayers at municipal councils in Manitoba." *BC Humanist Association*, 1-52. Available at https://www.bchumanist.ca/in_open_defiance

¹⁹ For further discussion see "Interprovincial Comparisons" below.

²⁰ See "Methods" above for exact municipalities that are missing, and exclusions.

²¹ Government of Newfoundland and Labrador, Department of Municipal Affairs and Community Engagement. (2025). "2025 election FAQs" [PDF]. Available at <https://www.gov.nl.ca/mca/files/2025-Election-FAQs.docx.pdf>

of the ceremonies are available, but those that are are short and unremarkable. It would seem that in Newfoundland and Labrador's municipal political culture, swearing-in ceremonies function primarily as procedural events rather than ceremonial occasions. Their purpose is to complete the statutory requirements associated with the transition to a new council, with little emphasis on celebration or symbolic events.

The only prayer identified in this study was delivered by Mayor John Norman in the Town of Bonavista at the 2021 inaugural meeting, over which he presided.²² Despite this, we found no evidence of prayers at Bonavista's regular meetings in 2023 or 2024, or their 2025 inaugural meeting. Our research team further examined meeting minutes and agendas for every 2026 meeting available on the Town's website as of July 29, 2026, and found no prayers at the council this year.²³ This further examination of subsequent inaugural and regular council meetings indicated a consistent practice of opening proceedings in a secular manner, without prayer.

Prayer in Regular Meetings

Regular council meeting minutes were available for 58 of 62 Newfoundland and Labrador Municipalities in 2024. None (0%) began with a prayer. This further confirms our finding from pre-Saguenay, and our reviews of prayers in provincial legislatures, that prayers are not a feature of Newfoundland and Labrador's political culture.²⁴

Consistent with our previous practice, we did not classify moments of silence as prayers. We did, however, identify recurring moments of silence in the regular council meetings of the Town of Bishop's Falls, which we understand to be secular in nature. In 2024, the studied agenda read *"Item 2: Moment of Silent Reflection, Council observed a minute for private reflection/prayer."*²⁵ Because this moment of silence leaves its content to each councillor and does not involve a spoken prayer led on council's behalf, we have not counted it as a prayer for the purposes of this report. Notably, as of October 23rd, 2026, no meetings conducted in 2026 in the town of Bishop's Falls have included a moment of silent reflection.²⁶

This universal absence of municipal prayers is a commendable achievement and one that will hopefully serve as an example for the rest of the country.

Interprovincial Comparisons

With no inaugural prayers in 2025, and no religious content in regular meetings, Newfoundland and Labrador is the most compliant province to date (**Figure 1** and **Figure 2**).

²² Town of Bonavista. (2021, October 25). *Inaugural meeting* [Meeting minutes]. https://www.townofbonavista.com/_files/ugd/0839d2_4343023cb4f44a278cc0fcd9c6f2c11b.pdf

²³ The last available meeting on record at time of research was July 20, 2026.

²⁴ Phelps Bondaroff et al. (2023)

²⁵ Town of Bishop's Falls. (2024, September 17). Public council meeting no. 1504 [Meeting minutes]. <https://www.bishopsfalls.ca/common/pages/GetFile.ashx?key=%2fFo5ATqk>

²⁶ See Town of Bishop's Falls. *Council minutes*. Retrieved October 23, 2026, from https://www.bishopsfalls.ca/town_hall/council_minutes

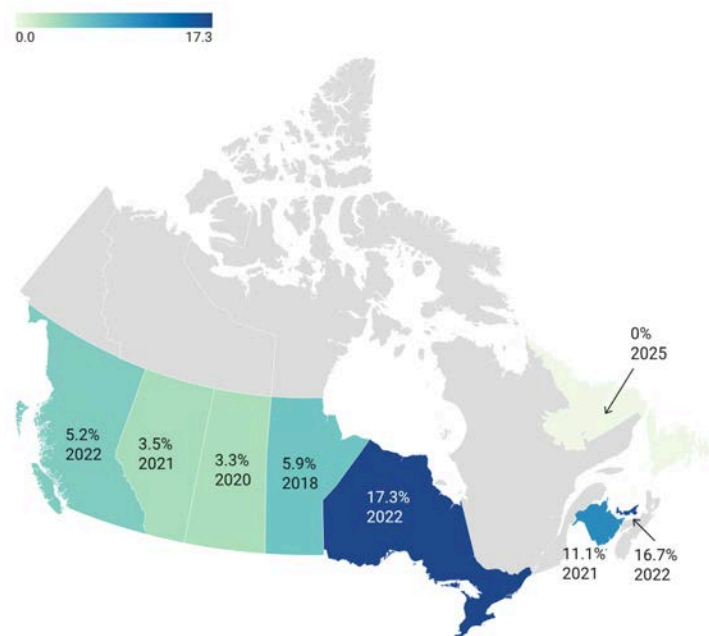


Figure 1 - Proportion of municipalities with prayers in their inaugural meetings, by province.

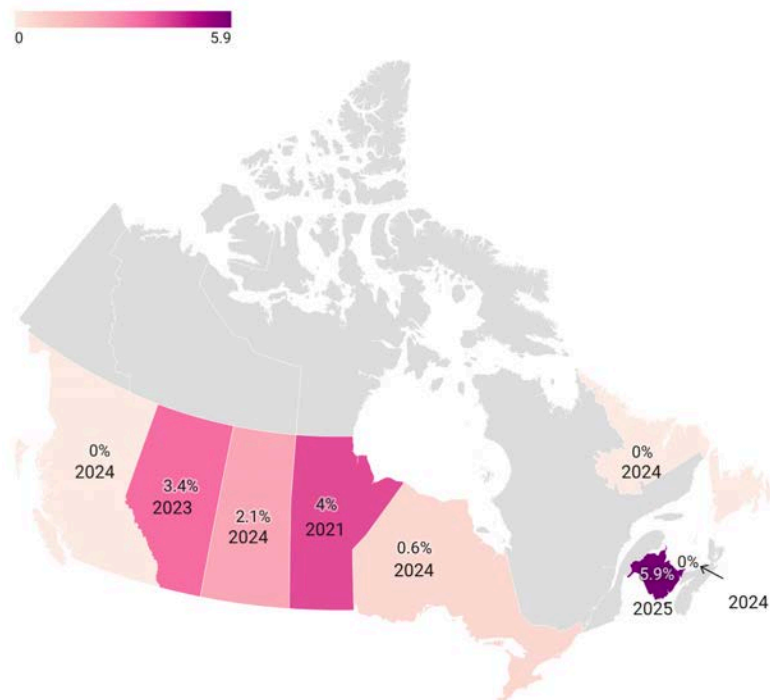


Figure 2 - Proportion of municipalities with prayers in their regular meetings, by province.

This difference is quite stark and hard to account for. As previously mentioned, most municipalities had either no prayer or no information available prior to *Saguenay*, suggesting that greater knowledge of the Court's decision did not have a significant effect in the province.

Although Newfoundland and Labrador is the most religious province in Canada by measure of religious affiliation, it was also the most secular province identified in this study with respect to municipal governance. According to the 2021 census, 82.4% of Newfoundlanders and Labradorians identified with a Christian denomination, the highest proportion of any province in Canada (see **Figure 3**).²⁷

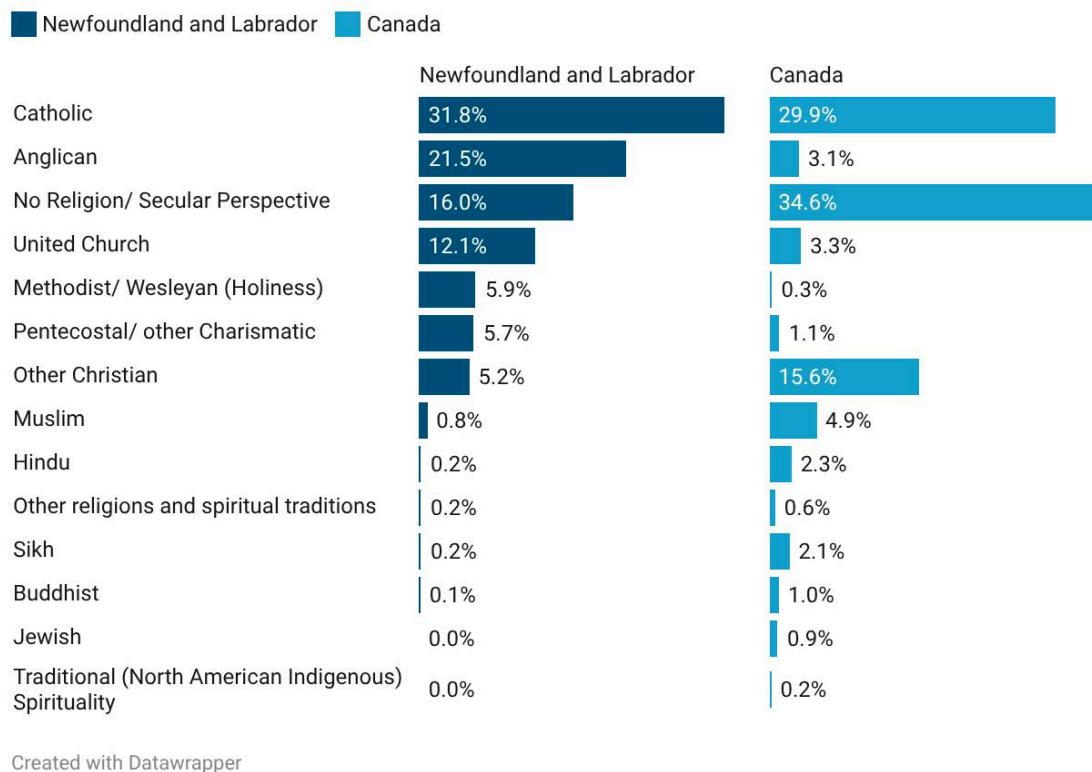


Figure 3 — Illustration of religious distribution in Newfoundland and Labrador and Canada In Census 2021.

This apparent contradiction suggests that high levels of personal or cultural religiosity do not necessarily translate into religious expression by public institutions. One possible explanation is the province's distinct political culture. For example, unlike several other Canadian provinces studied in our reports, where inaugural meetings are treated as civic ceremonies featuring invited clergy and other ceremonial elements, inaugural meetings in Newfoundland and Labrador are generally brief administrative proceedings focused on swearing in elected officials

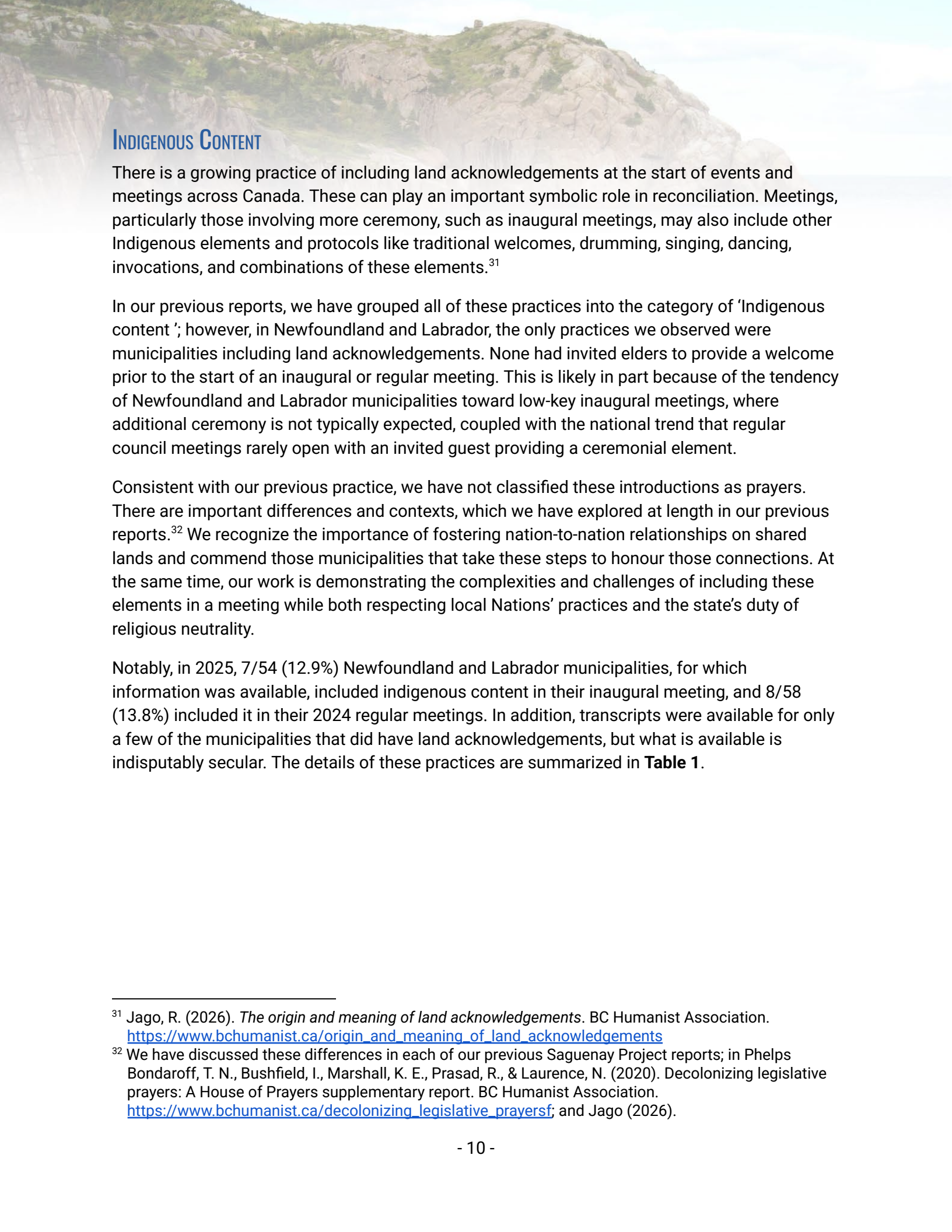
²⁷ Statistics Canada. (2022, October 26). *The Canadian census: A rich portrait of the country's religious and ethnocultural diversity* [Map]. Government of Canada. Available at <https://www150.statcan.gc.ca/n1/daily-quotidien/221026/mc-b001-eng.htm>

and constituting the new council.²⁸ The absence of ceremonial programming leaves little opportunity for the spectacle of an opening prayer.

Furthermore, Newfoundland and Labrador's unique history of denominational governance may also have contributed to a stronger institutional preference for religious neutrality in public affairs. For over a century, the province's education system and many public institutions were organized along denominational lines, requiring governments to balance competing Christian traditions.²⁹ Following constitutional reforms to the education systems in the 1990s, public institutions increasingly adopted non-denominational approaches.³⁰ When considered together, these historical and institutional factors may help explain why a province with high levels of religious affiliation has nevertheless developed a municipal political culture in which formal religious observances are uncommon.

Ultimately, it is beyond the scope of this project to determine the exact reason for Newfoundland and Labrador's unique status among our studies to date.

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- ²⁸ See Phelps Bondaroff, T.N., Laurence, N., Prasad, R., Thom, A., Darveau-Morin, A. & Bushfield, I. (2020 September). "Duty of neutrality beyond Saguenay: Prayers at municipal councils in British Columbia." *BC Humanist Association*. Available at https://www.bchumanist.ca/municipal_prayer?utm_campaign=muni_prayer_1&utm_medium=email&utm_source=bchumanist; and see also Phelps Bondaroff, T.N., Bushfield, I., & Jensen, O. (2023 November). "We yelled at them until they stopped: Revisiting prayers in BC municipal council meetings and the power of secular advocacy." *BC Humanist Association*, 1-66. Available at https://www.bchumanist.ca/we_yelled_at_them_until_they_stopped; Phelps Bondaroff et al. 2022 December; and Phelps Bondaroff, T.N., Thom, A., Prasad, R., & Bushfield, I. (2022 March). "In open defiance: Unconstitutional prayers at municipal councils in Manitoba." *BC Humanist Association*, 1-52. Available at https://www.bchumanist.ca/in_open_defiance
- ²⁹ Heerema, M. (2005). "Newfound religion: Term 17(3) of the Newfoundland Act and its challenge to the current discourse on freedom of religion in the public sphere." *Dalhousie Journal of Legal Studies*, 14, 111–140. Available at <https://digitalcommons.schulichlaw.dal.ca/djls/vol14/iss1/5/>
- ³⁰ Higgins, J. (2011). "The collapse of denominational education." *Heritage Newfoundland & Labrador*. Available at <https://www.heritage.nf.ca/articles/society/collapse-denominational-education.php>



INDIGENOUS CONTENT

There is a growing practice of including land acknowledgements at the start of events and meetings across Canada. These can play an important symbolic role in reconciliation. Meetings, particularly those involving more ceremony, such as inaugural meetings, may also include other Indigenous elements and protocols like traditional welcomes, drumming, singing, dancing, invocations, and combinations of these elements.³¹

In our previous reports, we have grouped all of these practices into the category of ‘Indigenous content’; however, in Newfoundland and Labrador, the only practices we observed were municipalities including land acknowledgements. None had invited elders to provide a welcome prior to the start of an inaugural or regular meeting. This is likely in part because of the tendency of Newfoundland and Labrador municipalities toward low-key inaugural meetings, where additional ceremony is not typically expected, coupled with the national trend that regular council meetings rarely open with an invited guest providing a ceremonial element.

Consistent with our previous practice, we have not classified these introductions as prayers. There are important differences and contexts, which we have explored at length in our previous reports.³² We recognize the importance of fostering nation-to-nation relationships on shared lands and commend those municipalities that take these steps to honour those connections. At the same time, our work is demonstrating the complexities and challenges of including these elements in a meeting while both respecting local Nations’ practices and the state’s duty of religious neutrality.

Notably, in 2025, 7/54 (12.9%) Newfoundland and Labrador municipalities, for which information was available, included indigenous content in their inaugural meeting, and 8/58 (13.8%) included it in their 2024 regular meetings. In addition, transcripts were available for only a few of the municipalities that did have land acknowledgements, but what is available is indisputably secular. The details of these practices are summarized in **Table 1**.

³¹ Jago, R. (2026). *The origin and meaning of land acknowledgements*. BC Humanist Association. https://www.bchumanist.ca/origin_and_meaning_of_land_acknowledgements

³² We have discussed these differences in each of our previous Saguenay Project reports; in Phelps Bondaroff, T. N., Bushfield, I., Marshall, K. E., Prasad, R., & Laurence, N. (2020). *Decolonizing legislative prayers: A House of Prayers supplementary report*. BC Humanist Association. https://www.bchumanist.ca/decolonizing_legislative_prayersf; and Jago (2026).

Table 1 – Land acknowledgements at Newfoundland and Labrador council meetings

Municipality	2025 Inaugural	2024 Regular
St. John's	Yes	Yes
Conception Bay South	Yes	Yes
Mount Pearl	No	Yes
Corner Brook	Yes	Yes
Gander	Yes	Yes
Stephenville	Yes	Yes
Pasadena	Yes	Yes
Lewisporte	Yes	Yes

Examples of land acknowledgements

At the Town of Stephenville's public meeting of council on October 9th, 2025 the following land acknowledgement was delivered by Mayor Bob Byrnes:

*The Town of Stephenville would like to respectfully acknowledge that Stephenville and the whole Bay St. George area is home to rich, diverse, and vibrant rural Indigenous communities. Located on the ancestral and unceded territory of the Beothuk, the lands and waters in and around us have traditionally served as a gathering place for the Mi'kmaq. The broader region of Newfoundland and Labrador continues to be home to diverse Indigenous Peoples, including First Nations, Inuit, and Métis. We honour and pay respect to the past, present, and future caretakers of these territories.*³³

City of St. John's 2024 Regular meeting transcript, read into record.

*We respectfully acknowledge the Province of Newfoundland & Labrador, of which the City of St. John's is the capital City, as the ancestral homelands of the Beothuk. Today, these lands are home to a diverse population of indigenous and other peoples. We would also like to acknowledge with respect the diverse histories and cultures of the Mi'kmaq, Innu, Inuit, and Southern Inuit of this Province.*³⁴

Town of Pasadena's 2025 land acknowledgement, read into record.

We respectfully acknowledge Pasadena as the ancestral homelands of the Mi'kmaq and Beothuk. Today, these lands are home to a diverse population of indigenous and other

³³ Town of Stephenville, NL Canada. (2025, October 9). *RGM October 9, 2025* [Video]. YouTube. <https://www.youtube.com/watch?v=mkD0gUuLiGo>

³⁴ City of St. John's. (2024 September 17). "Regular council meeting minutes." City of St. John's. Available at <https://pub-stjohns.escribemeetings.com/Meeting.aspx?Id=e6f91c7a-1882-42af-bd02-439c336c07be&Agenda=PostMinutes&lang=English>

peoples. We would also like to acknowledge with respect the diverse histories and cultures of the Innu, Inuit, and Southern Inuit of this Province.³⁵

Interprovincial Comparison of Indigenous Content

Figure 4 and **Figure 5** compare Indigenous content in Newfoundland and Labrador’s inaugural and regular municipal council meetings against the other provinces that we have studied to date. While it is notable that most municipalities in the province did not include territorial acknowledgements in their regular and inaugural council meetings, it is important to note that 44% of Newfoundland and Labrador’s population lives in the St. John’s region.³⁶

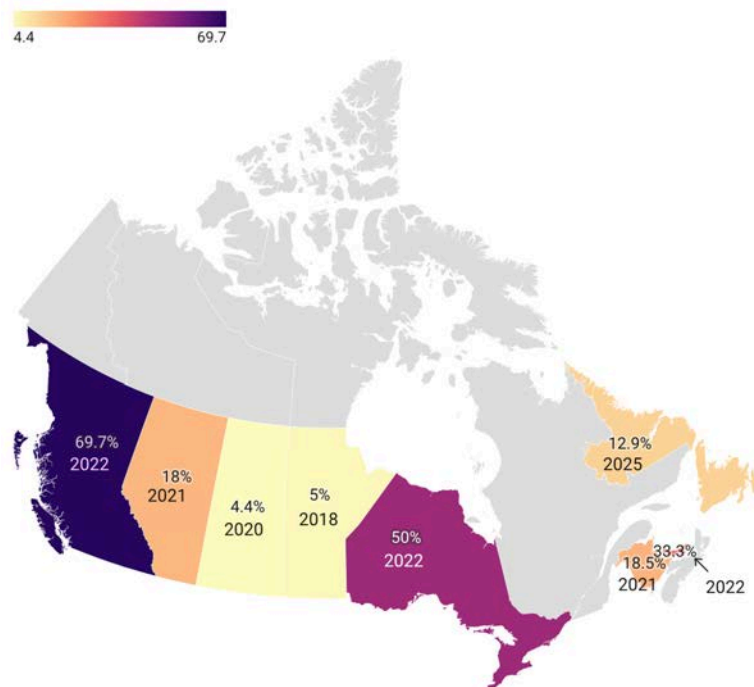


Figure 4 – Portion of municipalities by province with Indigenous content in inaugural meetings.

³⁵ Town of Pasadena. (2025 October 14th). “Committee of the Whole meeting minutes.” Town of Pasadena. Available at <https://drive.google.com/file/d/1ZAm4RUbN6NWACEjVzBiN43Z5Zgi9QvZw/view>

³⁶ City of St. John’s. (n.d.). *About St. John’s*. Available at <https://www.stjohns.ca/about-st-johns/>

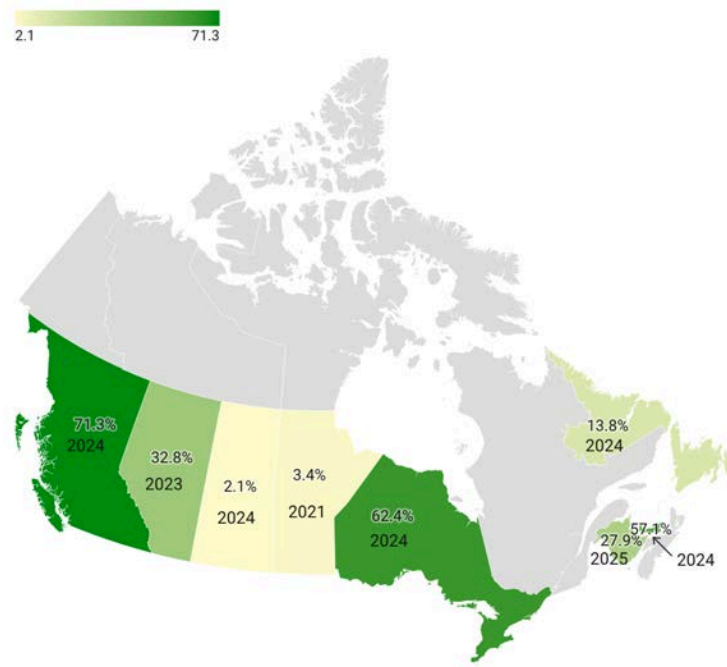


Figure 5 – Portion of municipalities by province with Indigenous content in regular meetings.



LIMITATIONS AND FUTURE RESEARCH

Potential Sources of Error

The largest source of error in this study is the incomplete availability of municipal records for a small number of municipalities. Data were unavailable for St. Anthony, Humber Arm South, and Upper Island Cove, limiting our ability to determine whether these municipalities incorporated prayer or other religious elements into council proceedings. Similarly, no swearing-in or inaugural meeting information could be located for Burin or Gambo. And for Burgeo, no swearing-in or inaugural records, nor records of a 2023 regular council meeting, were available. As a result, these municipalities could not be assessed using the same method as the rest of the sample.

Even where meeting records were available, the absence of video recordings represents another potential source of error. Most municipalities do not archive livestreams or recordings of council meetings or inaugural ceremonies, meaning that ceremonial practices occurring before the formal call to order, or outside the recorded proceedings, may not be captured by the meeting minutes. If prayers or other religious observances occurred without being formally documented, they would not be identifiable through documentary analysis alone.

A further limitation is the inconsistent availability of meeting agendas. In some municipalities, agendas were unavailable for one or more meetings, requiring reliance on minutes or recording where available. Because agendas often provide the clearest indication of the planned order of proceedings, their absence increases the possibility that prayers or other religious observances not reflected in the minutes may have been overlooked.

Our study focused on formal practices, which may overlook informal or unofficial ones that vary with each election. Situations like one-off prayers at meetings in response to events (e.g., the death of a community member or other prominent figure) might be missed by our approach. Private practices such as councillors praying alone or in small groups are also not likely to violate *Saguenay* and were not identified.

Finally, we also recognize that municipal bylaws and procedures are constantly being updated. If you identify an error in our data, please reach out to us so that we may update our dataset and findings.³⁷

Future Research

The findings of this study raise interesting questions about the relationship between Newfoundland and Labrador's religious identity and its public institutions. Census data from 2021 positions Newfoundland and Labrador as Canada's most religious province, with high

³⁷ Email: info@bchumanist.ca

rates of religious affiliation and Christian identification.³⁸ Yet, our analysis found it to be the most secular province we have analyzed, identifying fewer prayers in regular and inaugural council meetings than in any other province examined thus far. Future research could explore, in depth, the historical, political, and cultural factors that have produced this apparent divergence between private religious affiliation and public institutional practice. Such work might include archival research, municipal interviews, and comparisons with other provinces that exhibit different relationships between religiosity and government practice. In particular, future research could test whether any municipal councils that opened their meetings with prayer in the early 1990s stopped doing so amid the political and societal changes that accompanied the collapse of denominational education, from the 1995 and 1997 referendums to the constitutional amendment in 1998.³⁹

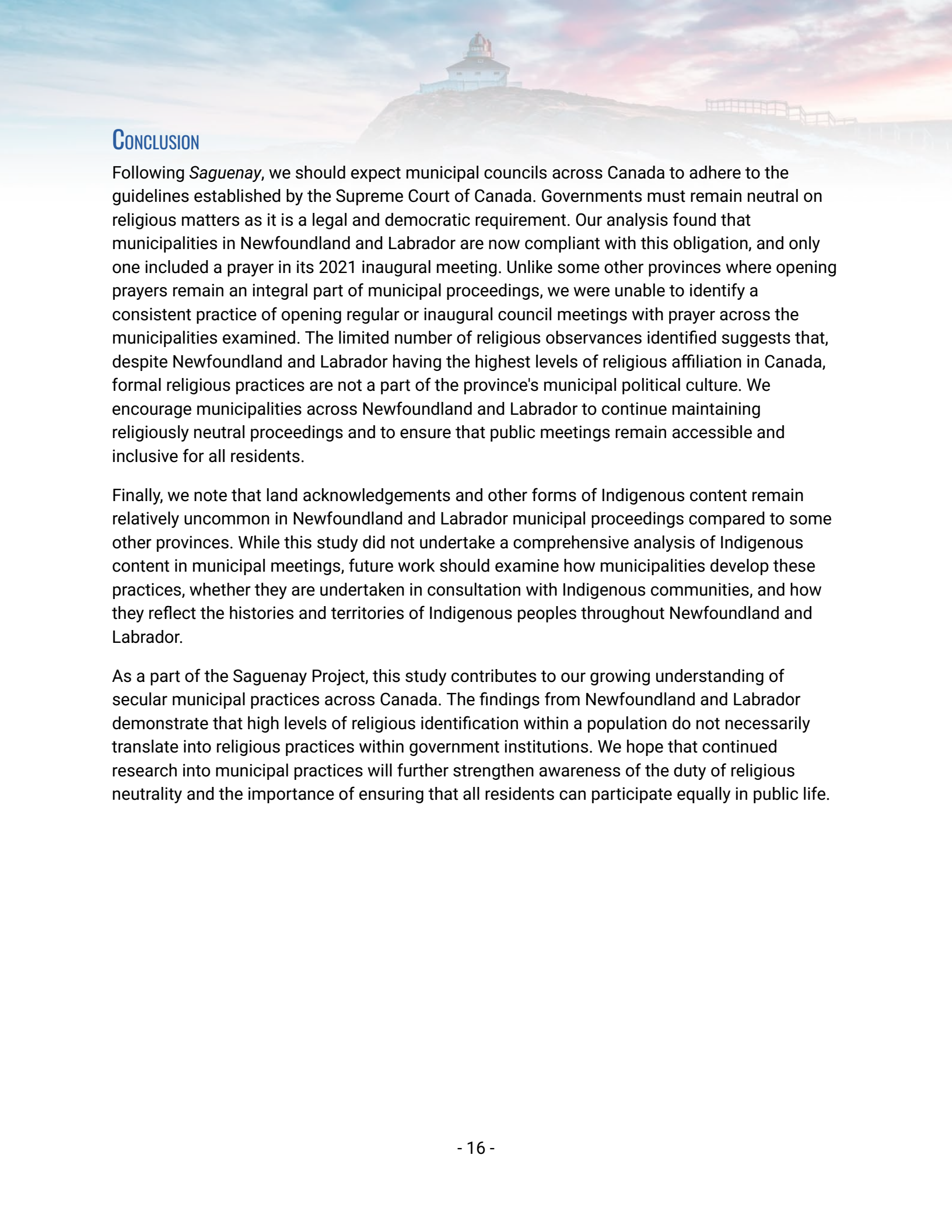
Furthermore, this report provides only a preliminary examination of Indigenous content in municipal proceedings; while land acknowledgements and related practices were noted where they occurred, no detailed analysis was undertaken of their wording, consistency, or relationship to Indigenous communities and traditions within Newfoundland and Labrador. Future research could examine how municipalities develop and use land acknowledgements, whether they reflect local Indigenous perspectives, and how these practices compare with those in other Canadian jurisdictions.

Finally, these findings are consistent with trends outside of local government meetings, as daily sessions of the Legislative Assembly of Newfoundland and Labrador have never opened in prayer.⁴⁰

³⁸ Statistics Canada. (2022, October 26). *The Canadian census: A rich portrait of the country's religious and ethnocultural diversity* [Map]. Government of Canada. Available at <https://www150.statcan.gc.ca/n1/daily-quotidien/221026/mc-b001-eng.htm>

³⁹ Higgins, J. (2011). "The collapse of denominational education." Heritage Newfoundland & Labrador. Available at <https://www.heritage.nf.ca/articles/society/collapse-denominational-education.php>

⁴⁰ Phelps Bondaroff, T.N., Prasad, R., Laurence, N., Darveau-Morin, A., Bushfield, I., & Thom, A. (2023 December). "Legislative prayer across Canada," 3rd ed. *BC Humanist Association*. Available at <https://www.bchumanist.ca/prayer-across-canada>

A lighthouse sits atop a rocky island, with the ocean and a colorful sunset sky in the background. The lighthouse is a small, white structure with a red roof and a lantern room. The sky is a mix of soft pinks, oranges, and blues, with wispy clouds. The water is calm, reflecting the colors of the sky.

CONCLUSION

Following *Saguenay*, we should expect municipal councils across Canada to adhere to the guidelines established by the Supreme Court of Canada. Governments must remain neutral on religious matters as it is a legal and democratic requirement. Our analysis found that municipalities in Newfoundland and Labrador are now compliant with this obligation, and only one included a prayer in its 2021 inaugural meeting. Unlike some other provinces where opening prayers remain an integral part of municipal proceedings, we were unable to identify a consistent practice of opening regular or inaugural council meetings with prayer across the municipalities examined. The limited number of religious observances identified suggests that, despite Newfoundland and Labrador having the highest levels of religious affiliation in Canada, formal religious practices are not a part of the province's municipal political culture. We encourage municipalities across Newfoundland and Labrador to continue maintaining religiously neutral proceedings and to ensure that public meetings remain accessible and inclusive for all residents.

Finally, we note that land acknowledgements and other forms of Indigenous content remain relatively uncommon in Newfoundland and Labrador municipal proceedings compared to some other provinces. While this study did not undertake a comprehensive analysis of Indigenous content in municipal meetings, future work should examine how municipalities develop these practices, whether they are undertaken in consultation with Indigenous communities, and how they reflect the histories and territories of Indigenous peoples throughout Newfoundland and Labrador.

As a part of the *Saguenay* Project, this study contributes to our growing understanding of secular municipal practices across Canada. The findings from Newfoundland and Labrador demonstrate that high levels of religious identification within a population do not necessarily translate into religious practices within government institutions. We hope that continued research into municipal practices will further strengthen awareness of the duty of religious neutrality and the importance of ensuring that all residents can participate equally in public life.

APPENDIX A: THE *SAGUENAY* DECISION⁴¹

Section 2(a) of the *Charter of Rights and Freedoms* guarantees Canadians the “freedom of conscience and religion.”⁴² Through a growing body of jurisprudence, the Supreme Court of Canada has established that in order to protect this freedom, governments have a “duty of religious neutrality.”⁴³ In 2015, the scope of this duty was delineated in *Mouvement laïque québécois v. Saguenay (City)*. In its unanimous decision, the Court ruled that the City of Saguenay, Quebec breached its duty of religious neutrality by including the recitation of religious prayer at the beginning of council meetings. Writing for the majority,⁴⁴ Justice Gascon stressed the ‘democratic imperative’ for officials acting in positions of state power to maintain neutrality by not engaging in any form of religious practice.⁴⁵

The Initial Complaint

Alain Simoneau was a resident of Saguenay, Quebec who regularly attended council meetings. He witnessed the mayor open council meetings by reciting a prayer after which the mayor would cross himself. Other council members and members of the public would follow suit. As an atheist, Simoneau felt ‘uncomfortable’ with the displays of religion while attending meetings and asked the mayor to stop the practice.⁴⁶ After the mayor ignored his request, Simoneau, with the assistance of Mouvement laïque Québécois (MLQ), turned to the Commission des droits de la personne et des droits de la jeunesse (CDPDJ).

In March 2007, the Commission opened an investigation into the alleged discrimination on the basis of religion, in violation of sections 3 and 10 of Quebec’s *Charter of Human Rights and Freedoms*.⁴⁷ The following May, the Commission concluded that the prayer was discriminatory. Simoneau and the MLQ filed a case with the Tribunal in July 2008.⁴⁸

⁴¹ Reproduced from Phelps Bondaroff *et al.* 2022 March.

⁴² *Charter*, s 2.

⁴³ *Saguenay*, para. 71; and see Boissinot, J. (2015 April 17). “The end of prayer in the councils of the nation.” *The Globe and Mail*. Available at <https://www.theglobeandmail.com/opinion/editorials/the-end-of-prayer-in-the-councils-of-the-nation/article24010902/>

⁴⁴ Eight justices signed on to Justice Gascon’s decision, while Justice Abella wrote a concurrence, supporting the decision but disagreeing with the majority on the standards of review, see *Saguenay*, paras. 165–173.

⁴⁵ *Saguenay*, para.75.

⁴⁶ *Ibid.*, para. 8.

⁴⁷ *Ibid.*, paras. 8 and 9. Section 3 of the *Charter* states that: “Every person is the possessor of the fundamental freedoms, including freedom of conscience, freedom of religion, freedom of opinion, freedom of expression, freedom of peaceful assembly and freedom of association.” Section 10 states that: “Every person has a right to full and equal recognition and exercise of his human rights and freedoms, without distinction, exclusion or preference based on race, colour, sex, gender identity or expression, pregnancy, sexual orientation, civil status, age except as provided by law, religion, political convictions, language, ethnic or national origin, social condition, a handicap or the use of any means to palliate a handicap. Discrimination exists where such a distinction, exclusion or preference has the effect of nullifying or impairing such right.” See *Charter of Human Rights and Freedoms*, CQLR c C-12.

⁴⁸ *Ibid.*, para. 11.

While the Tribunal was reviewing the case, the Saguenay Council passed a bylaw that codified the opening prayer, amended the wording of the prayer in a manner that was intended to make it 'non-denominational,' and provided a two-minute recess afterwards in order to allow those who chose to abstain from prayer and thus absent themselves, to join the meeting.⁴⁹ This bylaw was added to the complaint.

The Tribunal's conclusions were unequivocal. They concluded that the "prayer was religious and was a breach of religious neutrality" and it was a 'substantial' infringement of Simoneau's rights "to freedom of conscience and religion without discrimination."⁵⁰ Further, the bylaw was for a "religious purpose" and therefore also a breach of neutrality.⁵¹ The Tribunal ruled that the bylaw should be "inoperative and invalid" – the practice of opening meetings with prayer should cease, and that Simoneau be awarded \$30,000 in damages.⁵²

The Appeal and Standards of Review

The City of Saguenay appealed the decision to the Quebec Court of Appeal, who agreed to review the case on the basis that it was a "matter of importance to the legal system over which the Tribunal did not have exclusive jurisdiction."⁵³ The three-panel Court of Appeal unanimously overturned the Tribunal's decision and found that Simoneau's rights were not infringed. It concluded that state neutrality "does not require the state to abstain from involvement in religious matters." Further, cultural and "religious heritage" could be reconciled. And finally, that the updated prayer under the bylaw was not overtly religious but rather "expressed universal values."⁵⁴

The appellate court reached this verdict on the basis of a legal review that is called the 'standard of correctness.' The matter of the choice in the standard of review arose at multiple times during the journey of this case from the Human Rights Tribunal to the Supreme Court of Canada. While this is not the place for a detailed exploration of standards of review in Canadian jurisprudence, it is informative to outline the distinction between the two major standards in Canadian law.

In reviewing administrative decisions, Canadian courts rely on a framework called a standard of review to judge whether that decision should be upheld or overturned. The decision of "which standard applies depends on what kind of decision it is."⁵⁵ The standard of reasonableness is a deferential standard, which means the reviewing court should defer to the expertise of the decision maker. It is the typical standard of review for most administrative decisions. It posits

⁴⁹ *Ibid.*, para. 12.

⁵⁰ *Ibid.*, paras. 15 and 16.

⁵¹ *Ibid.*, paras. 15 and 16.

⁵² *Ibid.*, para. 17.

⁵³ *Ibid.*, para. 18; and see Quebec Court of Appeal, (2013), QCCA 936, 363 D.L.R. (4th) 62, para. 37.

⁵⁴ *Saguenay.*, paras. 20 and 21.

⁵⁵ Supreme Court of Canada. (2019). "Case law in brief: The standard of review (taken from Vavilov in the 'Administrative law trilogy')." 2019, SCC 65 and 2019 SCC 66. Available at <https://www.scc-csc.ca/case-dossier/cb/2019/37748-37896-37897-eng.pdf>

that a ruling is reasonable so long as it falls within a “range of possible, acceptable outcomes” and can be supported by evidence and the law.⁵⁶ A decision that is ‘reasonable, is “based on a logical chain of reasoning. It must make sense in light of the law and the facts.”⁵⁷ As a result, there can be more than one outcome, so long as that outcome was arrived at reasonably.

The standard of correctness, on the other hand, is much stricter. This standard posits that “a ‘correct’ decision is the only right answer in light of the law and the facts.”⁵⁸ As a result, only one ruling could be made on the case, and the reviewing court essentially asks whether the law was applied correctly in making the decision. Thus, “when applying the correctness standard, a reviewing court will not show deference to the decision maker’s reasoning process; it will rather undertake its own analysis of the question.”⁵⁹ In other words, the reviewing court essentially ignores the decision made by the administrative tribunal and re-analyzes the case. This “standard is meant for cases where a decision was made that has important and wide-ranging legal consequences.”⁶⁰

The Supreme Court of Canada codified the test for which standard applies in its 2008 ruling in *Dunsmuir v New Brunswick*.⁶¹ In this decision, the Court delineated the following factors that would lead decision makers to be given deference, and for a reasonableness test to be applied:

- A privative clause: this is a statutory direction from Parliament or a legislature indicating the need for deference.
- A discrete and special administrative regime in which the decision maker has special expertise (labour relations for instance).
- The nature of the question of law. A question of law that is of “central importance to the legal system . . . and outside the . . . specialized area of expertise” of the administrative decision maker will always attract a correctness standard (*Toronto (City) v. C.U.P.E.*, at para. 62). On the other hand, a question of law that does not rise to this level may be compatible with a reasonableness standard where the two above factors so indicate.⁶²

The choice of standard of review in the case was explored in both the decision and concurrence, which are detailed below.

The Supreme Court of Canada

In October of 2015, the Supreme Court of Canada heard an appeal of the decision of the Court of Appeal. The Supreme Court ruled that the Tribunal was correct to order the Saguenay Council

⁵⁶ *Ibid.*

⁵⁷ *Ibid.*

⁵⁸ *Ibid.*

⁵⁹ *Dunsmuir v New Brunswick*. 2008, SCC 9, [2008] 1 SCR 190, Para. 55.

⁶⁰ Indi. (2016 April 29). “Indi’s MLQ v Saguenay review: What went wrong in the appeal?” *Canadian Atheist*. Available at <https://www.canadianatheist.com/2016/04/indis-mlq-v-saguenay-review-3-the-appeal/>

⁶¹ *Dunsmuir v New Brunswick*; and see *Ibid.*

⁶² *Ibid.*, para. 55.

to “cease reciting a prayer in the municipal council chamber,” declared the bylaw inoperative, and awarded Simoneau \$30,000 in damages.⁶³ In reaching its decision, Justice Gascon concluded that the opening of council meetings with the recitation of a prayer “constituted discriminatory interference with Simoneau’s freedom of conscience and religion.”⁶⁴ While the Canadian and Quebec *Charters* do not explicitly impose a duty for the state to remain neutral in matters of religion and belief, Justice Gascon found that in order to protect the “variety of beliefs” under the Canadian *Charter*, there is a need for “true neutrality.”⁶⁵ Justice Gascon elaborated that

*True neutrality is concerned not with a strict separation of church and state on questions related to religious thought. The purpose of neutrality is instead to ensure that the state is, and appears to be, open to all points of view regardless of their spiritual basis. Far from requiring separation, true neutrality requires that the state neither favour nor hinder any religion, and that it abstain from taking any position on this subject. Even if a religious practice engaged in by the state is ‘inclusive,’ it may nevertheless exclude non-believers.*⁶⁶

Justice Gascon ruled that there was no way for the state to remain neutral while also engaging in a religious practice, because doing so creates a ‘hierarchy’ where those who share the expressed beliefs are ranked above those who do not share them. Justice Gascon also explained that true neutrality is a “democratic imperative” as it ensures that institutions, like municipal council meetings, are a “neutral public space that is free of discrimination and in which true freedom to believe or not to believe is enjoyed by everyone equally.”⁶⁷

In *Saguenay*, Justice Gascon concluded that the prayer was in violation of the state’s duty of true religious neutrality and an infringement upon “Mr. Simoneau’s right to exercise his freedom of conscience and religion.”⁶⁸ The prayer itself was expressly religious as denoted by the context (the content, the sign of the cross and the religious symbols) and by the admission of the Mayor of Saguenay himself, who declared:

*I’m in this battle because I worship Christ. When I get to the hereafter, I’m going to be able to be a little proud. I’ll be able to say to Him: “I fought for You; I even went to trial for You”. There’s no better argument. It’s extraordinary. I’m in this fight because I worship Christ. I want to go to heaven and it is the most noble fight of my entire life.*⁶⁹

This supported the conclusion that the Mayor and Council used public powers to engage in a practice where they “adopted or favoured one belief to the exclusion of others” while acting on

⁶³ *Saguenay*, paras. 151, 155, 160, and 161.

⁶⁴ *Ibid.*, para. 23.

⁶⁵ *Ibid.*, paras. 68 and 71.

⁶⁶ *Ibid.*, para. 137.

⁶⁷ *Ibid.*, paras. 73-75.

⁶⁸ *Ibid.*, para. 120.

⁶⁹ *Ibid.*, para. 92 and 116, emphasis removed.

behalf of the state, and thus turning council meetings into a “preferential space for people with theistic beliefs.”⁷⁰

Although the Saguenay Council had also allegedly tried to accommodate those who chose to abstain from prayer through the introduction of a bylaw that amended the wording of the prayer and allowed for a two-minute recess, this had the opposite effect. It exacerbated Simoneau’s sense of “isolation, exclusion and stigmatization” by requiring that he either conform or reveal his non-belief by physically separating himself from others.⁷¹

In addition to determining whether the state’s duty of religious neutrality was breached, Justice Gascon ruled that the Court of Appeal had erred by applying standards of appeal to the Tribunal’s decision, instead of standards of judicial review. Furthermore, the Court of Appeal erred in using the standard of correctness instead of the standard of reasonableness. Justice Gascon argued that as a specialized administrative decision-maker, the Court of Appeal should have deferred to the Tribunal. The Court should have limited the standard of correctness to the question of the scope of the state’s duty of neutrality and applied a reasonableness standard to other questions, such as “whether the prayer was religious in nature, the extent to which the prayer interfered with the complainant’s freedom and the determination of whether it was discriminatory fall squarely within the Tribunal’s area of expertise.”⁷²

The Court unanimously allowed the appeal and restored much of the Tribunal’s conclusions: the bylaw was declared invalid, the City and Mayor were ordered to cease the recitation of prayers in council chambers, and the municipality had to pay \$30,000 in damages to Mr. Simoneau.

Justice Abella’s Concurrence

In her concurrence, Justice Abella objected to the use of different standards within a single review and noted that approach to selecting a standard strayed from the directives established in *Dunsmuir*.⁷³ Justice Abella wrote that “using different standards of review for each different aspect of a decision is a departure from our jurisprudence that risks undermining the framework for how decisions of specialized tribunals are generally reviewed.”⁷⁴ Justice Abella insisted that *Dunsmuir* established “that questions of general importance to the legal system attract the correctness standard only if they are outside the tribunal’s expertise,” and that the question of determining whether discrimination occurred is well within the mandate of the Human Rights Tribunal, and is in fact its ‘daily fare.’⁷⁵ The concurrence questions why the ruling subjects “one aspect of freedom of religion to more rigorous scrutiny than the main issue of whether the right itself has been violated and there has been discrimination.”⁷⁶ Justice Abella elaborated that “we

⁷⁰ *Ibid.*, paras. 113 and 120.

⁷¹ *Ibid.*, paras. 120 and 121.

⁷² *Ibid.*, para. 50.

⁷³ *Ibid.*, para. 166.

⁷⁴ *Ibid.*, para. 165.

⁷⁵ *Ibid.*, para. 167.

⁷⁶ *Ibid.*, para. 169.

have never dissected the right in order to subject its components to different levels of scrutiny.”⁷⁷ Justice Abella elaborated, noting,

*My final concern is a practical one. What do we tell reviewing courts to do when they segment a tribunal decision and subject each segment to different standards of review only to find that those reviews yield incompatible conclusions? How many components found to be reasonable or correct will it take to trump those found to be unreasonable or incorrect? Can an overall finding of reasonableness or correctness ever be justified if one of the components has been found to be unreasonable or incorrect? If we keep pulling on the various strands, we may eventually find that a principled and sustainable foundation for reviewing tribunal decisions has disappeared. And then we will have thrown out Dunsmuir’s baby with the bathwater.*⁷⁸

In Justice Abella’s view, the decision was within the expertise of the tribunal and should be reviewed entirely within a reasonableness framework.

Justice Abella warned that “To extricate [the duty of neutrality] from the discrimination analysis as being of singular significance ‘to the legal system as a whole’, elevates it from its contextual status into a defining one.”⁷⁹ This suggests a unique role for the duty of religious neutrality in Canadian law. Unlike the US Constitution, Canada’s *Charter* does not have an establishment clause, but Justice Abella’s view of the majority’s decision suggests the duty of neutrality is “a transcendent legal question.”⁸⁰

Consequences of *Saguenay*

The *Saguenay* decision has led to further development of the scope of the state’s duty of neutrality by requiring the state to practice ‘true neutrality.’ In practice, the decision outlined that state officials, *acting in an official capacity*, must not profess or practice any religious belief. This includes the abstention of prayers at municipal council meetings. As summarized by Justice Gascon

*By expressing no preference, the state ensures that it preserves a neutral public space that is free of discrimination and in which true freedom to believe or not to believe is enjoyed by everyone equally, given that everyone is valued equally.*⁸¹

As such, beginning a municipal council meeting with prayer is strictly proscribed by law, and this prohibition is part of the democratic imperative of the state’s duty of religious neutrality.

⁷⁷ *Ibid.*, para. 170.

⁷⁸ *Ibid.*, para. 173.

⁷⁹ *Ibid.*, para. 168.

⁸⁰ *Ibid.*

⁸¹ *Ibid.*, para. 74.

Since the *Saguenay* decision, many municipal councils across the country have amended their procedures to abolish prayers from meetings to comply with the ruling, but apparently not all. In her recent book, Lori Beaman documented several municipal officials who, commenting after the ruling, expressed an intention to violate *Saguenay*. For example, then Caledon, Ontario Mayor Allan Thompson declared that “personally I am disappointed, and I don’t support it... Canada was built on a Christian law. We’ve shown tolerance to all faiths... and I am not about to erode our principles.”⁸² Along a similar vein, the Mayor of Oshawa, Ontario announced that “I’m proud to be a Canadian, [and] I intend to continue doing the Lord’s Prayer prior to the commencement of the council meetings.”⁸³ This reticence to comply with the law underscores the importance of our research into prayer at municipal council meetings across Canada.

⁸² Beaman, L.G. (2020). *The transition of religion to culture in law and public discourse*. London, UK: Routledge.

⁸³ *Ibid.*

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