Comments on Proposed Amendments to the *Indian Act*

Submission to:
Indigenous Services Canada and Justice Canada

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INTRODUCTION

The Union of BC Indian Chiefs (UBCIC) submission to Indigenous Services Canada (ISC) and Justice Canada will respond to the proposed amendments to the *Indian Act* including 1) *Enfranchisement*, 2) *Individual Registration*, 3) *Natal Band Membership*, as well as providing 4) *Further Comments* on outstanding barriers to equality in the *Indian Act* and 5) *Recommendations,* with the understanding that there will be an opportunity for further engagement and submissions on the other proposed amendments in 2023. The submission aims to demonstrate how the intersecting forms of discrimination that Indigenous women and girls experience today are indicative of the continuing practices and effects of colonialism that have been generated and shaped by Canada's historic and ongoing intention and actions designed to extinguish Indigenous cultures, assert control over Indigenous lands, and assimilate Indigenous societies through the *Indian Act*.

Indigenous women, girls and 2SLGBTQQIA+ peoples living in Kanáta (Canada) experience destructive and intersecting forms of sex and racial discrimination that have been fostered, strengthened, and protected by historical and contemporary Canadian colonial structures, institutions, and legal orders, most notably the *Indian Act*, *1876* (the *Indian Act*). This racist, misogynistic, infantilizing, and paternalistic piece of colonial legislation is at the heart of over a hundred years of racism, sexism, discrimination, violence, forced assimilation and systematic removal of First Nations women from their lands, communities, and cultures, and the denial of their Indigenous, treaty, and land rights. This legacy of colonial policy and centuries of mistreatment hail from the Doctrine of Discovery and *terra nullius* upon which Canada is founded. The goal of Canada's so-called 'Indian policy' was to get rid of the 'Indian problem,' which is evidenced in Indian registration provisions which will result in legislative extinction dates for First Nations. Canada's attempts to rectify sex-based discrimination in the *Indian Act* have been unsuccessful and piecemeal at best, creating further barriers for women and their descendants accessing their rights.

Despite Canada's efforts and the disproportionate impacts of endemic levels of violence and inequality, Indigenous women and girls remain courageous leaders who are holding the Canadian government accountable for its ongoing role in sanctioning and condoning the systemic human, international and Indigenous-rights violations and abuses that have been formally recognized as "genocide against Indigenous women, girls, and 2SLGBTQQIA people."[1]

In June 2021, Canada has adopted without qualification, the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP), and has committed to its implementation. UNDRIP affirms:

> **Article 8(1):** Indigenous peoples and individuals have the right not to be subjected to forced assimilation or destruction of their culture;
> **(2):** States shall provide effective mechanisms for prevention of and redress for:

[1] "Calls for Justice." National Inquiry into Missing and Murdered Indigenous Women and Girls. Last modified, 2019. http://www.MMIWG2S-ffada.ca/wp-content/uploads/2019/06/Calls_for_Justice.pdf

> a) Any action which has the aim or effect of depriving them of their integrity as distinct peoples, or of their cultural values or ethnic identities;
> b) Any action which has the aim or effect of depriving them of their integrity as distinct peoples, or of their cultural values or ethnic identities;
> c) Any form of forced population transfer which has the aim or effect of violating or undermining any of their rights;
> d) Any form of forced assimilation or integration;
> e) Any form of propaganda designed to promote or incite racial or ethnical discrimination directed against them.

Canada's federal legislation must comply with UNDRIP once it is fully implemented. Indigenous Services Canada and Justice Canada must work in earnest to amend the *Indian Act* to comply with UNDRIP and the *United Nations Declaration on the Rights of Indigenous Peoples Act*; this includes eliminating gender discrimination and all recommendations made by UBCIC and other like-minded organizations who are in alignment with UNDRIP.

UNION OF BC INDIAN CHIEFS

The UBCIC is a First Nations political advocacy organization founded in 1969 with a mandate of advancing and protecting First Nations Title and Rights. The UBCIC strengthens First Nations' assertions of their Title, Rights, Treaty Rights and Right of Self Determination as Peoples, working collectively among First Nations in British Columbia (BC) as a cohesive advocacy body.

UBCIC has a robust history of advocacy to end gender-based violence alongside Indigenous women in the pursuit of justice, safety, and an end to the crisis of Missing and Murdered Indigenous Women, Girls, and Two-Spirit People (MMIWG2S+). UBCIC a crucial member of the Coalition on Murdered and Missing Indigenous Women, Girls, and Two-Spirit+ people (The Coalition).

The Coalition is an alliance of organizations and individuals that came together in 2010 at the time of the Oppal Inquiry into Missing and Murdered Women in British Columbia. The Coalition includes Indigenous women and their allies in women's anti-violence, human rights, and labour organizations. Members have deep knowledge, expertise, and lived experience of discrimination and violence; some are family members and friends of murdered and disappeared women, girls, and Two-Spirit + people; and many have been engaged for years in front-line, grassroots anti-violence work on the streets and in shelters across the province. Members of the Coalition also have expertise in policy development and analysis regarding Indigenous rights, child welfare, and policing, as well as knowledge and practice in human rights, civil liberties, criminal, constitutional, and international human rights law.

UBCIC is also a member of the Sex Discrimination in Indian Registration Working Group, an advocacy body of organizations and women experts from across Canada who convene in

pursuit of full recognition of citizenship and human rights of First Nations women and their descendants who have been discriminated against under the *Indian Act*.

BACKGROUND

Sex-Based Discrimination in the *Indian Act*

The Doctrine of Discovery and terra nullius

The forms of discrimination that Indigenous women and girls experience today are linked to the continued practices and effects of colonialism in Canada and the papal bulls on the Doctrine of Discovery and *terra nullius.* The dehumanizing and racist legal principle that "European countries extinguished Indigenous sovereignty and acquired the underlying title to Indigenous Peoples' lands upon 'discovering' them"[2] Is another driving force of colonial practice.

Since 1869 these lands have been under the central control of the British Crown. Prior to and after assuming control of these territories, colonial and patriarchal laws from the United Kingdom have sustained this doctrine of denial and worked to destroy the rights of Indigenous peoples, particularly of Indigenous women, including their ties to their families, cultures, identities, and lands. These laws, most notably the *Indian Act, 1867* and all iterations have created a damaging patriarchal system that "subjected Aboriginal women to loss of Indian status and the benefits of band membership, eviction from reserve home, and denial of an equal share of matrimonial property."[3] Depriving Indian women (First Nation women) of their status, land, potential treaty entitlements under recent settlement agreements, and property, this system of forced assimilation shaped the conditions of discrimination, impoverishment, and violence that continue to place First Nations women and their children at a severe economic and social disadvantage.

"Voluntary" Enfranchisement'

If an Indian man were to give up his status via the "voluntary" enfranchisement provisions in the *Indian Act,* his Indian wife and their children would automatically be deprived of their status. First Nations women and their descendants were effectively robbed of their political voice and disentitled from the benefits of treaties, inherent rights, and a connection to their

[2]Bruce McIvor. "Residential Schools and Reconciliation: A Canada Day Proposal." First Peoples Law. Last modified June 16, 2021. https://www.firstpeopleslaw.com/public-education/blog/residential-schools-and-reconciliation-a-canada-day-proposal.

[3]Sharon McIvor, *Aboriginal Women Unmasked: Using Equality Litigation to Advance Women's Rights*, 16 Can. J. Women & L. 106, 107 (2004). Pamela Palmater*, Beyond Blood: Rethinking Indigenous Identity* (Saskatoon: Purich Publishing, 2011) [now under UBC Press].Pamela Palmater, "Genocide, Indian Policy and the Legislated Elimination of Indians in Canada" (2014) vol.3, no.3 Aboriginal Policy Studies Journal 27.

lands, communities and cultures as they were no longer able to reside on reserve, among family and immersed in culture.

"Marrying Out", Status Endowment to Non-Status Women, and Blood Quantum

In stark contract to status men, pre-1985 status women had their Indian Status taken away upon marriage to a non-Indian man and were prevented from transmitting Indian status to their children.

Conversely, when a status man married a non-Indian woman, she gained Indian status, status entitlements, and could keep and transmit her status to their children, even after divorce.[4] This demonstrates that Canada's attempts to qualify Indian status through policies of notional blood quantum allotments, were inherently sexist and were only enforced when applied to First Nations women.

Owing to the 1985 Bill C-31 Amendment that introduced section 6(1) and 6(2), notional blood quantum measurements have been used to determine status entitlements, whereas non-Indian women who married status men and their descendants benefited from the acquired rights provisions in 6(1)(a) 'full status' with access to related rights and benefits. However, a status woman who married a non-Indian man would pass status only based on one parent being a status holder and thus pass only 'half status' 6(2), based on racist and arbitrary notions of blood quantum assigned to different sections of the Indian Act. The imposed power imbalance between men and women created by sexist colonial policies has had everlasting effects on how First Nations communities operate and women's roles in governance have been highly degraded by the imposition of imposed forms of Indian Act governance through the Chief and Council band system which are highly controlled by, and accountable to the federal government instead of their members.

The inequities of status transfer through marriage for status holding men, vs. status holding women have not been fully remedied.

Today, the Canadian government's determination of status eligibility is still rooted in proximity to another status holder, under a tiered system. Applicants are faced with authenticating their descent from an Indian versus their ancestry and kinship in their Nations. They must do this using government records to prove 'adequate' closeness in relation to another status holder – one of their parents must be a "full Indian" (section 6(1) Indian) or both of their parents must be a status Indian. The child of a section 6(2) Indian alone is denied status – thereby cutting off the line.

[4] Government of Canada. (2022). "Background on Indian registration." Government of Canada. Online: https://www.rcaanc-cirnac.gc.ca/eng/1540405608208/1568898474141

Today's issues stem in part from the *Indian Act, 1985* amendments which, while remedying the issue of discrimination against First Nations women who 'married out', introduced further issues when Canada implemented the assimilationist and mathematically genocidal 6(1), 6(2) laws which seek to further extinguish First Nations people through measurements of notional blood quantum, while simultaneously creating conditions which have led to increased marriages between status Indians and non-Indians, as First Nations people have been deposed of their lands and cultures, and pushed further from their communities into urban centers.

UBCIC has previously called for the Government of Canada to address all remaining sex-based inequities in the *Indian Act*, ensuring all actions and measures are aligned with the *UN Declaration on the Rights of Indigenous Peoples* and enable the inherent rights of First Nations peoples to self-determine their own citizenship processes under their respective Indigenous laws, legal orders and jurisdiction.[5]

Through a 2017 amendment to the *Indian Act* (*Bill S-3: An Act to amend the Indian Act in Response to the Superior Court of Quebec decision in Descheneaux*) Canada attempted to remove the core of the *Indian Act*'s sex discrimination. Through Bill S-3, it was estimated approximately 270,00-450,000 women and their descendants became eligible for Indian status and the associated benefits. Despite repeated calls from UBCIC and other organizations to fast-track applications, as of 4 April 2022, only 28,152 people have actually been registered under the 2017 amendments.[6]

The Canadian government has not only made the application process unduly cumbersome and lengthy but has not adequately notified those entitled to registration (or kept up to date with registrant contact information like any other government-issued identification processes and record-keeping) of their change in Status. Canada continues to negate the social and economic impacts that loss of status has had on women and their descendants, making no attempt at reparations to address the intergenerational impacts of these inequities, and enacting a non-liability clause that attempts to obfuscate Canada's financial liability for the generational harms they have caused and continue to cause. Compensation is addressed in our "Further Comments" section.

The "One-Parent" Rule AKA the Second-Generation Cut-Off

Whereas Bill C-31 removed the "double mother" rule, it introduced a new barrier, the "one-parent" rule in the introduction of Section 6(1) versus 6(2) Status. If only one parent is entitled under 6(1) Status, the children of that parent will only be entitled to 6(2) Status which means those children will not be able to pass on their Status, unless they have children with another

[5] UBCIC Resolution 2021-19 "Support for Removal of Ongoing Discrimination in the *Indian Act*".
[6] Indigenous Services Canada, Follow-up from the Standing Senate Committee on Aboriginal Peoples, June 10, 2022, Government Initiatives on S-3
https://sencanada.ca/Content/Sen/Committee/441/APPA/briefs/FollowUp_ISC_S-3June10_b.pdf

person registered under the *Indian Act*. On the other hand, if both parents held Status, their children would be entitled to 6(1) Status, and so on. This is another forced blood quantum policy and disregards familial relations. Children and families will be ousted from their home communities because of their government-mandated entitlements, which are not based on their First Nations traditional laws. It is genocidal and is an extinctions-based policy that will eventually lead to the elimination of Indian Registrants, Bands and reserve lands. In comparison, Canadian citizenship is determined on a one-parent rule basis, as well as Nunavut land claims beneficiaries. There are no other groups in Canada that relies on a two-parent rule for citizenship, membership or transmission of culture. UBCIC urgently recommends the removal of the hierarchical system of Indian Status under Section 6 and the removal of the two-parent rule to eliminated to prevent another instance of genocide.

INDIGENOUS SERVICES CANADA PROPOSED AMENDMENTS TO THE INDIAN ACT

1. ENFRANCHISMENT

Under the *Indian Act*, women and their children, were involuntarily stripped of their status (enfranchised) if their husbands/fathers were enfranchised. Indian women were also forced to "voluntarily" surrender their Indian status in order to be "permitted" to get married. The *Nicholas* case is illustrative of some of these situations. The circumstances under which men were 'voluntarily' or 'involuntarily' enfranchised were unjust and assimilationist, encouraging First Nations to forgo their inherent and treaty rights in an effort to forcibly assimilate them into the settler Canadian identity (focused on Eurocentric views about culture and civilization), in an attempt to relinquish Canada from its fiduciary responsibilities. This group of women and their descendants were overlooked during the 1985, 2010 and 2017 amendments that sought to fully correct the issue of 'marrying out'. UBCIC supports the proposed amendment to remedy the long-standing discrimination outlined in the *Nicholas* case and supports the reinstatement of status to those who:

- lost status for being out of the country for five years without permission of the Minister (section 13 just prior to Sept 4, 1951, or any former provision relating to same subject matter;
- joined certain professions or were ordained ministers (section 111 just prior to July 1, 1920, or any former provision relating to same subject-matter;
- were enfranchised through band enfranchisement (section 112 just prior to April 17, 1985, or any former provision relating to same subject matter
- "voluntary" and involuntary enfranchisement of any kinds under any provision.

2. INDIVIDUAL DEREGISTRATION

According to ISC, this proposed amendment is for Indian status registrants to have the ability to de-register themselves from the *Indian Act*. We understand that specific situations may call for individual deregistration, such as a registrant wanting to be a member of a private Métis body;

however, we find that this provision in its current form has the potential to be another case of voluntary enfranchisement and assimilation. For this proposed amendment to go forward, it must be clear that there will be no repercussions for opting out, and no repercussions or delays to opting back in, including entitlement to band membership. This provision should not exist without very specific provisions and the option to opt back into the *Indian Act*. Individual reregistration amendments must include similar provisions to those under Bill C-31 which states that anyone who registers under the Bill as a result of historic discrimination, must be added to the band list so that entitled persons can choose to register with the *Indian Act* on their own accord.

There are also consequences for entitled descendants of registrants who choose to opt out of the *Indian Act.* Similar to the enfranchisement provision prior to the 1985 amendment, children of those who voluntarily opt out/enfranchise, are disproportionately affected. Children of those who opt out should not be adversely affected by their parent(s) decision to leave the *Indian Act*. This is not a choice that should be made on children's behalf and this proposed amendment must include exceptions for children of entitled persons who opt out. Additionally, if a parent opts out, this must not change the entitlements to the children. For instance, if a section 6(2) parent opts out, and the other parent is under 6(2), rendering their children section 6(1), the child's entitlements should not change. To do so would be reprehensible, genocidal, and replicating the former provisions of assimilation and involuntary enfranchisement. UBCIC recommends that this proposed amendment not move forward at all as it is assimilative and the impacts to community have the potential to cause great and lasting negative impacts on children.

3. NATAL BAND MEMBERSHIP

Women who were forced to leave their natal bands upon marriage to a man of a different band not only lost familial connections, but also access to their traditional territories and likely a loss of language and culture. The proposed amendment provides a new legal mechanism that would allow those women who lost the right to be a member of their natal band prior to 1985 because they were transferred to their husband's band to request to have their membership in their natal band restored. UBCIC supports the proposed amendment to create a new legal mechanism to facilitate restoring membership with their natal bands for women who were involuntarily transferred to their husbands' bands due to the patriarchal and misogynist nature of the *Indian Act*.

However, it must be noted that in the proposed amendments, ISC maintains (see ISC engagement kit) that section 10 Bands, that have adopted their own membership codes, can refuse to accept a requested transfer of a woman back to her natal Band. Similarly, for previous amendments to Indian registration, which restored, corrected or improved their Indian status, must have their associated right to band membership also specifically protected. This approach will permit section 10 bands to discriminate on the basis of sex, contrary to the *Canadian Human Rights Act*, and contrary to Articles 9, 44 and 22 of the *Universal Declaration on the*

Rights of Indigenous Peoples which guarantee the right of Indigenous women to belong to an Indigenous community or nation without discrimination.

Canada must not allow sex discrimination it created (plus the associated liabilities and costs) to be passed on to section 10 bands (own membership codes) or section 11 bands (Canada controls membership). But for the sex discrimination enacted pre-1985, these women and their descendants would have been band members, long before bands were granted the power to enact their own membership codes in 1985. Canada has the fiduciary and legal obligation to put these women and descendants in the position they would have been but for the discrimination – which includes membership in their home bands.

4. OUTDATED LANGUAGE

The proposed rephrasing of "mentally incompetent Indian" to "Dependent Person", while less offensive in language alone, is still infantilizing First Nations peoples and taking control of how we take care of our community members and families. A legally dependent person under the *Accessible Canada Act*, would already have specific provisions and laws that legislate how they may live their lives and the roles of their caretakers and asset managers. We recommend that any legislation regarding this change in language be consulted on with the Canada Human Rights Commission and First Nations to ensure that First Nations peoples with mental and physical disabilities are not being treated unjustly due to their status as an Indian Status person. First Nations people are independent, autonomous, and sovereign people with inherent rights that predate colonization. Our ability to take care of our relatives does not concern the Federal Government.

The proposed language change, while an acceptable improvement, upholds paternalistic attitudes and oppression that are innately colonial and contravene the obligations Canada must account to under its adoption of the UN Declaration.

UBCIC rejects the proposed language amendments on principle that they are a band-aid solution that do not meaningful address the innate racism upheld by the *Indian Act* or acknowledge First Nations sovereignty and jurisdiction. The protection of rights must be paramount over mere word changes.

A major policy consideration that Canada must focus on is addressing the outdated language of the "Indian" Act itself. The continued usage and assigned word 'Indian' is a result of an early explorer that was lost. This archaic and wholly wrong classification should have been abolished hundreds of years ago, yet Canada and the Crown continue to mislabel First Nations peoples. We are aware of the purposeful use of this word to continually misidentify First Nations peoples as another form of humiliation and subjugation. This land is not 'India' as previously thought. This must be amended to reflect our true identities as the First Peoples of this continent and to foster a road to reconciliation; one that is filled with immediate and meaningful action.

5. FURTHER COMMENTS

UBCIC has included a brief section on further comments outside of the scope of your requested amendment areas in recognition that there are many further issues in the *Indian Act* that require amendment for which ISC has not proposed amendments.

Compensation

Canada fails to meaningfully acknowledge the loss and harm to First Nations women and generations of descendants by barring access to reparations or compensation through the enactment of a non-liability clause. This continued discrimination speaks to a long-standing position that Canada has taken to strip First Nations women of their place in their communities and their human rights. Generations of women and their descendants have endured irreparable harm as a result of sex-based discrimination in the *Indian Act* including forcible disconnection from the land, their family, communities, cultures, language, access to education, medical care, and identities. This amounts to genocide. Indigenous people harmed by discrimination under *other* federal laws are not barred from receiving compensation has been granted for other historic harms including to:

1. First Nations, Inuit & Metis survivors of Indian residential schools;
2. First Nations, Inuit and Metis survivors of Indian day schools;
3. First Nations, Inuit and Metis survivors of the sixties scoop;
4. First Nations children in the child welfare system;
5. Inuit for dog slaughter and forced relocation
6. First Nations for lack of clean drinking water
7. First Nations for the construction of hydroelectric dams
8. First Nations for stolen lands
9. First Nations people for historic treaty entitlements, such as the Treaty 8 Agricultural Benefit action currently taking place

The clause to bar reinstates, newly entitled registrants or those with “improved” registration in bills C-31, C-3, and S-3 – including these new proposed amendments, from seeking compensation is sexist, racist and discriminatory. It fails to consider the devastating harms caused by genocidal laws and policies under the *Indian Act*. It speaks to a long-standing position that Canada has taken to strip First Nations women of their place in their communities and their human rights. Disallowing women and their descendants from claiming compensation for *Indian Act* sex discrimination and the forced systematic from their communities, which has today resulted in disproportionate experiences of poverty, violence, incarceration, and poorer health outcomes, is blatant sex discrimination. Women and children must be compensated for the things that were systematically taken from them by Canada who purposefully excluded them from their communities.

Ultimately, sex discrimination has fostered a destructive belief that First Nations women are second class persons with fewer rights and powers than their male counterparts which has persisted into the present and exacerbated the Missing and Murdered Indigenous Women, Girls, and Two-Spirit + People (MMWG2S) human rights crisis. Sex discrimination in the *Indian Act* is a root cause of the MMIWG2S crisis and a key element of the Canadian genocide against Indigenous peoples. The government continues to ignore the critical connections between sex discrimination in the *Indian Act* and the MMIWG2S crisis by failing to prioritize the restoration of status in its MMIWG2S National Action Plan. Released on June 3, 2021, the National Action Plan to end systemic racism and violence against Indigenous women, girls, and 2SLGBTQQIA people in Canada contains no detailed strategies, timelines, commitments, or new resources for the registration of the women and their descendants. Until the harmful, longstanding impacts of the *Indian Act*'s sex discrimination are redressed and those newly entitled to status are registered, First Nations women and their children will continue to bear the brunt of the discrimination and disenfranchisement that has precipitated the disappearances and murders of the MMIWG2S crisis.

Service Standards

On the service standards of obtaining new Indian status as a result of the Bill C-31, Bill C-3, and Bill S-3, new applicants are met with their applications waiting approval for up to 2 years. Indian status cards are a form of government identification and should be treated with the same due process and procedure as a passport or provincial identification. To hold entitled people hostage for years while they wait for their entitlements as the First peoples of this land is racial discrimination. Many nations across Canada are going through litigation for treaty entitlements and settlement agreements, and new members are missing out on their rights to these monies, as they should have always been entitled to Indian Status. To make matters worse, the new status cards come with a ten-year expiry date – something never imposed on First Nations men under previous registration sections. This is a new form of discrimination and must be eliminated.

Status Cards and Discrimination

Canada's laws and policies tied to the *Indian Act* have created far-reaching harm in all aspects in the lives of First Nations people beyond sex discrimination, including through the definition and identification of First Nations people through government-administered status cards.

The Government of Canada is responsible for the creation of the concept of Indian status, for the legislation defining Indian status, and for issuing associated status cards.

UBCIC commissioned a recent study *They Sigh or Give you the Look: Discrimination and Status Card Usage* which sought to better understand the implications of status card use for retail and identification purposes, specifically whether this leads to experiences of racism and discrimination, the forms such discrimination may take, and the impacts of any discrimination

experienced. The study found that discrimination in the use of status cards was almost a universal experience (>99%) amongst the survey respondents.

Discrimination was particularly acute amongst LGBTQ2S+ people already experiencing social stigma and compounding oppressions of racism and discrimination on the basis of their gender and/or sexual identity.

The government of Canada has failed their responsibility to create a safe, knowledgeable, and informed environment for status Indians to use their status cards and ultimately to navigate Canadian society and institutions as First Nations people free from discrimination, racism, or oppression.

RECOMMENDATIONS FOR CANADA

1. ISC and Justice Canada to move forward with the proposed amendments as well as further amendments to the *Indian Act* before the end of 2023;
2. Commit to the removal of all remaining gender-based discrimination in the *Indian Act,* including the repeal of section 6(2), and new amendments to confirm a one-parent form of status transmission;
3. Clarification that removal of 6(2) will remedy discrimination caused by pre and post 1985 marriage and birth cut-off dates;
4. Removal of bars to compensation for discrimination caused by the status provision of the *Indian Act*;
5. Prioritize service standards and ensure new registrants receive their government-issued identification in a timely manner which is similar to receiving a new passport or provincial government identification;
6. Ensure address information is kept up to date and provide easy mechanisms for registrants to be able to do so to ensure communication lines remain open;
7. Address discrimination that results from status card use, which is experienced at higher rates by LGBTQ2S+ individuals through implementing recommendations identified in the UBCIC report as a bare minimum.

APPENDIX

1. Union of BC Indian Chiefs. (2022) “They Sigh or Give You the Look: Discrimination and Status Card Usage”.