

Métis Rights and the Duty to Consult & Accommodate

**Workshop on Developing a Consultation Process to
Arrive at a Métis Consultation Policy**

April 2008



Purpose of this Workshop

1. To provide an update on Métis harvesting.
2. To provide an overview of the duty to consult & accommodate and the implications of this duty for Métis citizens and the Métis Nation.
3. Identify and discuss Métis-specific issues, challenges and priorities in relation to the duty to consult & accommodate in the Province of Alberta.
4. Receive input from Métis citizens on how the MNA should move forward on consulting with Alberta Métis in order to collaboratively develop and implement a Métis Consultation Policy.

The Long Battle for Métis Hunting Rights Begins in 1814

- 1814 - Governor Macdonnell issued a proclamation forbidding the hunting of buffalo from horseback because it drove the herd too far from Red River. This was the specialty of the Métis.
- There were skirmishes throughout the winter of 1814-1815 with Cuthbert Grant encouraging the Métis to continue hunting as they always had.



The New Nation

- It is at this time that the Métis began to describe themselves as the “New Nation”.
- The tensions eventually led on June 19, 1816 to the “Battle of Seven Oaks” where the Métis killed all but 4 of Governor Semple’s approximately 25 men.



1849 - The Sayer Trial



- Hudson's Bay Co. attempts to restrict trading by the Métis.
- Trial of Guillaume Sayer in Red River.
- Métis (led by Louis Riel Sr.) surround the courthouse.
- Sayer is convicted but with no penalty.
- Métis declare "*Le commerce est libre!*"
- Thereafter the HBCo monopoly was broken.

The First Hunting Legislation



- *1876 & 1879 - An Act for the protection of game in the Province of Manitoba*
- *1877 - Ordinance for the Protection of the Buffalo.*
- Did not apply to Indians within the limits of their reserves provided the game killed was for their own use and not for sale or traffic
- Also did not apply to "travellers" who required food
- QUERY? - are the Métis the "travellers"?

Developing the Regulatory Regime



- The natural resources regulatory regime at the time was largely concerned with preserving resources for non-Aboriginal access.
- Preserving Aboriginal and treaty subsistence harvesting rights was, to say the least, not a priority.
- By the 1890s the fish and wildlife regulatory regime we know today was developed.

Father Knows Best



- Policy makers in the Ontario government believed that it was in the best interests of all Aboriginal peoples that they abandon their traditional lifestyle.
- "... [government needs to teach them] that their true and permanent interests are to protect the deer and moose. By and by they will get good wages as licensed guides if they will only turn in and respect the law and help to protect these game animals. It is necessary that we should make an example of some of them ..."
- Ontario Commissioner of Crown Lands, Gibson, 1899.

Protecting Whose Interests?

- The game and fish laws were developed to protect the interests of recreational users, tourists and sportsmen.
- Sportsmen and their organizations were encouraged in *“every town and village ... to aid in molding public sentiment, the import of which is absolutely essential to a proper enforcement and observance of the law.”*
 - Annual Report of the Department of Fisheries of the Province of Ontario, (1904)
- The interests of recreational users, tourists and sportsmen were not only inseparable from government natural resource management but formed the major policy, allocation and goal of the management regime.
- The allocation was, by virtue of these policies, directed away from Aboriginal traditional resource users.

“down we forgot as up we grew”

- The Provinces’ arguments were simple – summed up in the following quote from *Rex v. Train* – *“this being our land we are entitled to say what shall be done upon it.”*
- Not surprisingly, Aboriginal access to game and fish declined as other users gained influence over the natural resources regulatory regimes across Canada.
- Throughout the 20th Century, the decline in legal protection and recognition of Aboriginal and treaty harvesting rights was incremental.
- It occurred over many decades and through dozens of policies, regulations, orders-in-council and statutes, each of which progressively and cumulatively negatively affected the legal framework for recognition and affirmation of Aboriginal harvesting rights.

Pre-1982



- By the late 1970s, Aboriginal peoples were being charged for practicing their traditional way of life on the land.
- Aboriginal rights generally were not recognized and harvesting rights protected by treaties or the *Natural Resources Transfer Agreements* could be ignored or overridden by either level of government through laws of general application.

Political Action

- In reaction to the failure of the law to recognize and protect their Aboriginal and treaty rights, when discussions about patriating the Constitution began, Aboriginal peoples lobbied to ensure their rights were addressed within any proposed constitutional amendments.
- By the fall of 1980, Aboriginal organizations had been successful in obtaining public support for the idea of entrenching Aboriginal and treaty rights in the Constitution.
- The Canadian Bar Association, the Pepin-Robarts Task Force on Canadian Unity, a Joint Senate-House of Commons Committee on the Constitution, and church groups all called for a constitutional provision that would provide protection for Aboriginal rights.

Métis Fight for Protection of Aboriginal Rights in the Constitution of 1982



- Métis across the Homeland fight and lobby for inclusion of Métis in *Constitution Act, 1982*
- Harry Daniels, Elmer Ghostkeeper, Tony Belcourt, and, many others

Métis Rights Recognized and Affirmed: Section 35 of the *Constitution Act, 1982*

At the time, in the House of Commons and Senate, s. 35 was described as:

- “a turning point in the status of native peoples in this country”,
- “a renewal of our commitment to the native peoples”,
- an “historic recommendation of equality of constitutional standing of the Aboriginal peoples with other communities in Canada”,
- “a political watershed in the lives of the Aboriginal people in Canada”; and
- a “reconciliation of old and difficult grievances.”

The Lost Years: 1982-1990

- The First Minister's meetings produced no results.
- Métis had to take government to court to be included in these meetings.
- Métis National Council was created.
- Government was supposed to change its legal regime to bring it in line with the new Constitution.
- Government did nothing so aboriginal people were forced to litigate.



R. v. Sparrow

- 1990 - the first aboriginal harvesting rights case - *R. v. Sparrow*.
- Resulted in policies across Canada that ceased charging Indians for hunting & fishing for food.
- These policies were not applied to the Métis.



Métis Harvesting Cases 6 Wins

- *R. v. McPherson* - 1994 Manitoba
- *R. v. Morin & Daigneault* - 1998 Saskatchewan
- *R. v. Powley* - 2003 Ontario – Supreme Court
- *R. v. Maurice & Gardiner* - 2002 Saskatchewan
- *R. v. Laviolette* - 2005 Saskatchewan
- *R. v. Belhumeur* - 2007 Saskatchewan

Métis Harvesting Cases 12 Losses

- *R. v. Howse* – 2002 - BC
- *R. v. Blais* – 2003 - Manitoba – Supreme Court
- *R. v. Grumbo* – 2003 - Saskatchewan
- *R. v. Nunn* – 2003 - BC
- *R. v. Norton & Samuelson* – 2005 - Saskatchewan
- *R. v. Burns* – 2005 - Ontario
- *R. v. Gary M. Smith* – 2005 - Saskatchewan
- *R. v. Willison* - 2006 - BC
- *Ontario (Ministry of Natural Resources) v. Guay* – 2006 - Ontario
- *R. v. Beaudry* - 2006 - Ontario
- *Ontario (Ministry of Natural Resources) v. Fortin* – 2006 - Ontario
- *R. v. Gagnon* – 2006 - Ontario

R. v. Powley

- *R. v. Powley* - first affirmation of Métis rights by the Supreme Court of Canada;
- The case confirmed Métis are a full-fledged rights-bearing people; and
- Set out a 10 part test for the recognition of Métis communities and their food harvesting rights.

Post *Powley* in Alberta negotiating the IMHA

- MNA negotiated an *Interim Métis Harvesting Agreement* with the Alberta Government.
- The IMHA did not duplicate the *Powley* test. It was not intended to.
- The IMHA was intended to anticipate that Métis throughout the Province would be able to prove harvesting rights.
- The IMHA reflected the fact that Métis are highly mobile and have a tradition of harvesting throughout Alberta.
- The IMHA was an accommodation agreement.

IMHA - Victim of Political Whim

- Unfortunately, political tide changed.
- During the election to replace the leader of the provincial conservative party, the IMHA became part of the political election campaign of one of the candidates - Ted Morton - who promised to cancel the IMHA if elected.
- Mr. Morton was unsuccessful in his bid for leadership. However, he is now the current Minister for Sustainable Resources Development.
- Shortly after Mr. Morton took office the IMHA was terminated.
- This repeats the events in Ontario of the late 1990s where Mike Harris campaigned for the leadership of the Ontario provincial conservative party. One of his campaign promises was to cancel harvesting agreements with some First Nations in Ontario. On being successfully elected he implemented his promise and cancelled the agreements.

R. v. Kelley

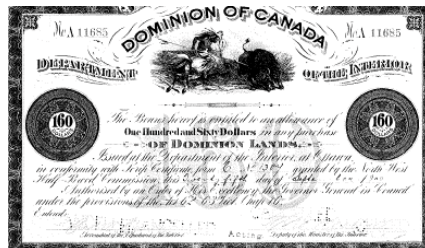
- The Alberta government charged Mr. Kelley for trapping squirrels.
- Mr. Kelley was trapping under the IMHA.
- The trial judge said the IMHA was unlawful because it overstepped the *Powley* test by providing for Métis harvesting rights throughout the Province.
- The trial judge also said the IMHA was unlawful because it had no legal foundation - and the government could not, by contract or agreement with a specific group, violate the law.

Kelley Appeal

- On Appeal the judge acquitted Mr. Kelley and said he had a right to rely on the IMHA.
- The judge said that the IMHA was legally unenforceable because it was not given the force of law by regulation, order in council or statute.
- The judge said that this finding did not relieve the Alberta government of its constitutional imperative to accommodate Métis harvesting rights.



Alberta Métis Harvesting Policy



- Following the termination of the IMHA and the *Kelley* appeal, the Ministry unilaterally implemented its own Métis Harvesting Policy.
- The Alberta Métis Harvesting Policy recognizes 17 Métis communities north of Edmonton and permits recognized Métis to harvest within a 170 km radius of their communities.
- In this way Alberta conservation officers are determining where Métis communities are; who is Métis; who is recognized as a member of a Métis community; who can harvest and where.

What is MNA doing about this?

- In 2007, the MNA Annual General Assembly unanimously rejected Alberta's 'Métis Harvesting Policy' and adopted a MNA Harvesting Action Plan and MNA Harvesting Policy.
- Métis harvesters continue to harvest in defiance of Alberta's arbitrary and unilateral policy.
- MNA organized traditional hunts across the province.
- 15 charges now pending plus increasing daily.
- MNA is now defending Métis harvesters who have been charged and 'test cases' are moving forward to challenge the policy and Alberta's unconstitutional hunting laws.

Test Case Being Litigated

- The first test case will likely be in Lethbridge beginning in late 2008 or early 2009.
- Bundling cases together.
- This case will deal with the issue of defining the Métis community.
- This case will attack the Alberta Métis Policy - 17 communities, 170 km harvesting radius.
- No more cases needed - no more public hunts necessary.



Consultation & Accommodation A New Framework to Protect Rights

- In 2004, the Supreme Court of Canada released two landmark Aboriginal rights decisions: *Haida Nation v. British Columbia* and *Taku River Tlingit v. British Columbia*.
- *Haida & Taku* set out a new legal framework – the duty to consult and accommodate – which flows from the honour of the Crown and s. 35 of the *Constitution Act, 1982*.
- These cases rejected longstanding government positions that Aboriginal peoples first had to go to court to prove they had a right before a government had any obligation to recognize, protect or accommodate Aboriginal rights and interests
- *Haida & Taku* affirm that s. 35 is not an ‘empty box’ or just a right for Aboriginal people to go to court.

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Duty to Consult & Accommodate Applies to the Métis



- The duty to consult and accommodate applies to Métis because the duty flows from s. 35 and the Honour of the Crown
- Métis have existing Aboriginal rights protected in s. 35 and the Crown has the same constitutional “Honour” to all Aboriginal peoples.

Applying the Duty to Consult to the Métis

- Courts have applied the duty to consult to the Métis in three cases - *in R. v. Kelley; R. v. Laurin*, and *Labrador Métis Nation v. Newfoundland and Labrador*.
- Most governments say that they accept that the duty applies to Métis, but whether that actually means anything varies from province to province:
 - **Ontario** has provided funds to support Métis participation in province-wide consultations to develop an Ontario Métis Consultation Framework.
 - **Manitoba** has recently issued a 'Provincial Policy for Crown Consultations with Aboriginal Peoples', which states Métis are included.
 - **Saskatchewan** has issued 'Guidelines for Consultation with First Nation and Métis' and is actively engaging Métis on developing a Métis-specific consultation policy.
 - **Alberta** states it intends to develop a 'Métis Consultation Policy' and is engaged in a "pre-policy initiative" stage.
 - **Canada** has published its "Aboriginal Consultation and Accommodation: Interim Guidelines for Federal Officials to Fulfill the Legal Duty to Consult" (Feb 2008)

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What Is The Duty To Consult And Accommodate?

- The duty requires the Crown to consult with, and, where appropriate, accommodate Métis rights and interests when it considers initiating conduct that might adversely affect Métis rights, interests, way of life or the sustainability of lands Métis rely on.
- The duty is triggered when the Crown has real or constructive knowledge of the potential existence of credible Métis rights claims and it contemplates conduct that might adversely affected those rights.
- The duty requires appropriate consultation and possibly accommodation with the affected Métis community, with a view to substantially addressing Métis concerns or finding workable solutions in order to protect Métis rights and interests.

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What Is Consultation?



- It is helpful to think of consultation as an ongoing dialogue or conversation.
- Consultation is a process of give and take, and, it is a process that takes time.
- A good consultation process results in informed decision making in a manner that furthers everyone's interests (i.e. Métis, government, industry, public-at-large, etc.).

What Is Accommodation?

- Accommodation flows from consultation. Accommodations are meant to achieve a balancing of Métis rights and interests with government, industry and non-Aboriginal interests.
- Accommodations are also meant to further the reconciliation process that is mandated by s. 35 of the *Constitution Act, 1982* and the honour of the Crown.
- An accommodation may take many forms:
 - It could be a modification of a project to minimize harm to Métis traditional harvesting areas (eg: changing the route of a road)
 - It could be a protocol to involve Métis in the project's development, implementation and monitoring.
 - It could be an impacts and benefits agreement that provides, among other things, compensation for the loss of traditional practices.
 - It could be other innovative initiatives that minimize the negative affects of the project on the rights, interests and way of life of the Métis community.
 - It could be a combination of all or some of the above items.

How Can Métis Participate in Consultation and Accommodation?



- The ultimate purpose of consultation and accommodation is to protect Métis rights, interests and way of life. In order to do this, Métis need facts:
 - about what the project is.
 - where the Métis rights and interests are on the land.
 - about sites and locations that are important to Métis culture.
 - about whether the project will actually affect Métis rights, interests and way of life.

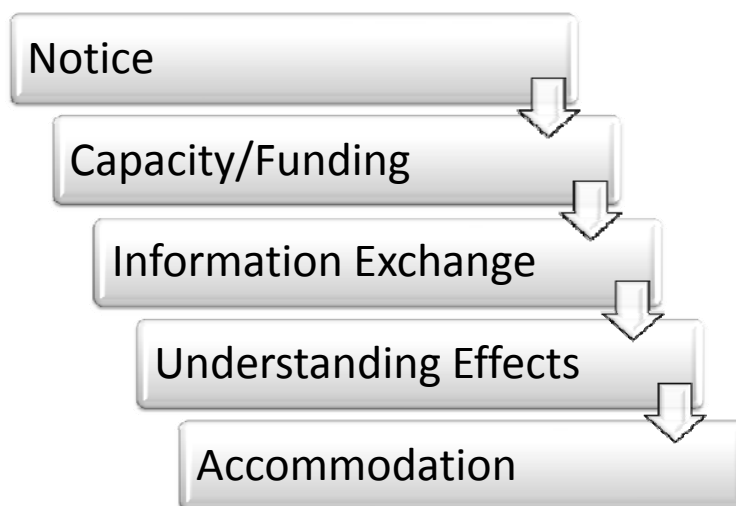
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What Is The Purpose Of Consultation And Accommodation?

- Before you demand or negotiate an accommodation focus on establishing a relationship with the government and the proponent in order.
- This will enable a process to get underway that will make it possible to get the facts that are needed (i.e. funding to undertake necessary fact gathering work, research, etc.).
- Once Métis get the facts, there is usually a need to engage an expert to assess the impacts of the project on Métis rights, interests and way of life.
- At that time, Métis can negotiate an accommodation that hopefully minimizes the impacts of the project.
- This type of principled approach may protect Métis rights, interests and way of life in the short and longer term.

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What Does An Effective Consultation And Accommodation Process Look Like?



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STEP #1: Notice

- Governments informs the public and Aboriginal peoples (including Métis) about a development project that is being planned in areas that could affect them.
- Public notices are usually an ad in the newspaper or a letter to municipalities or 'stakeholders'. A public notice does not satisfy the government's obligation to notify Aboriginal peoples.
- Notice must be sent to the appropriate representatives of the rights-bearing Métis community. As such, notice may be sent to the Métis Nation's local, regional and provincial governance structures, since a regional rights-bearing Métis community is usually not represented by just one Local and may span several MNA regions.
- Notice to a municipality (whose mayor may be Métis) does not constitute notice to the Métis community. Notice to an individual Métis trapper does not constitute notice to the Métis community.

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STEP #2: Funding /Capacity

- Consultation and accommodation processes costs money. The Métis community cannot be expected to participate without some financial and capacity support. Governments and proponents must provide funding to the Métis community in order to ensure effective Métis participation.
- The Métis community should propose a budget to the government and/or proponent. The funding request should be based on the size and scope of the work that needs to be done. (facts need to be gathered, traditional land use study, biologist report, meetings with government and/or proponent, legal advice, community engagement, etc.)
- A Métis community may not be able to fully determine what needs to be done. Establishing a formal and ongoing relationship with the government and/or proponent to facilitate consultation may be helpful. This type of relationship may be established through a negotiated protocol or agreement. These arrangements often include some level of initial financial support to get the Métis community engaged, but also may include provisions for additional funding as the parties determine what needs to be done.

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STEP #3: Information Exchange

- This is the longest part of the process. The government and developer as well as Métis have different obligations:
 - (1) the government and developer must provide the Métis community with all relevant information they have on the project (i.e. detailed overview of project, an Environmental Impact Statement, etc)
 - (2) the Métis community must inform the government and developer about Métis rights, interests and way of life in the area. This will require research and mapping studies.
- Since most Métis communities have never done research or mapping studies, the funding should be used to commission experts to undertake this work.
- The larger rights-bearing Métis community must be consulted in order to get a true picture of Métis interests and land use in a specific region. Interviews with specific individuals or one Métis Local may not give you a complete picture of what needs to be protected. For example, even though a few Métis rights-holders may live next to the proposed area to be developed, other Métis rights-holders living throughout the regional community may extensively harvest in area that is to be developed. While the Métis living next to the proposed development may have unique interests to be considered, the potential effects on other Métis rights-holders throughout the region should not be ignored or minimized. As such, maps showing the aggregated land use by the entire Métis community are essential.

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STEP #4: Understanding Effects

- A Métis community will combine its research and map studies with the information provided by the government and/or developer in order to see where and how the project will affect Métis rights, interest and way of life.
- An expert is required in order to undertake this type of assessment properly. Based on this analysis, the Métis community will begin to understand whether or not there is the potential for significant impacts from the project.
- If the potential impact is minimal or if there will be no impact, the consultation process has been effectively completed and the Métis community should be updated if there are changes in proposed project.
- If the potential impact is not minimal, then the government and developer have an obligation to work with the Métis community to minimize or lessen the impact (i.e. arriving at an accommodation). The expert's report prepared in this stage should also outline each potential impact and provide suggestions on how these could be minimized.

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STEP# 5: Accommodation

- After the expert report prepared for Step #4 is provided to the government and developer, the parties need to sit down to discuss potential accommodations.
- To date, history has shown there are very few projects that get stopped entirely. However, projects have been changed to lessen land use impacts (i.e. re-alignment of roads, setting up protected areas, etc.). As well, accommodations are often negotiated to address other impacts (i.e. cultural, economic, etc.).
- The research, map studies and expert reports commissioned by the Métis community in Steps #3 and #4 should inform the types of accommodations requested. As well, it is essential that the community has been engaged and updated throughout this process and that they understand and support the accommodations being requested.
- The ultimate goal of accommodation is to ensure the affected Métis community is not damaged or as little as possible. Innovative accommodations may need to be developed in order to minimize or limit the potential damage.

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Who Has the Duty to Consult?

- The duty to consult and accommodate rests with the Crown (i.e. government).
- The Crown can delegate the work to third parties (i.e. industry, Crown agencies, etc.)
- Industry, proponents, Crown agencies and third parties can assist in ensuring consultation and accommodation has taken place, but, at the end of the day, it is the Crown that must ensure that the duty has been fulfilled appropriately.



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Consulting with the Métis Community

- Métis rights are collective rights. Because it is the Métis community that holds right, it is the community that needs to be consulted with respect to the potential impacts on Métis rights and interests. The duty to consult and accommodate is not fulfilled by government or proponents talking to individual Métis citizens or individual Métis Elders or harvesters. There is a need to consult the Métis community.
- As such, the representative governance structures of the rights-bearing Métis community need to be engaged. Since rights-bearing Métis communities are regional in nature and can be quite large and expansive, several components of contemporary Métis government structures may need to be involved in order to ensure the entire community is consulted (e.g., several Métis Locals, multiple MNA Regions, MNA as a whole when all Alberta Métis may be effected, etc.).
- In order to effectively consult with the rights-bearing Métis community various parts of Métis government - Locals, Regions and MNA provincial body – will need to work together. As well, some projects may require engagement with other provincial Métis governments when project crosses provincial boundaries (i.e. a pipeline).

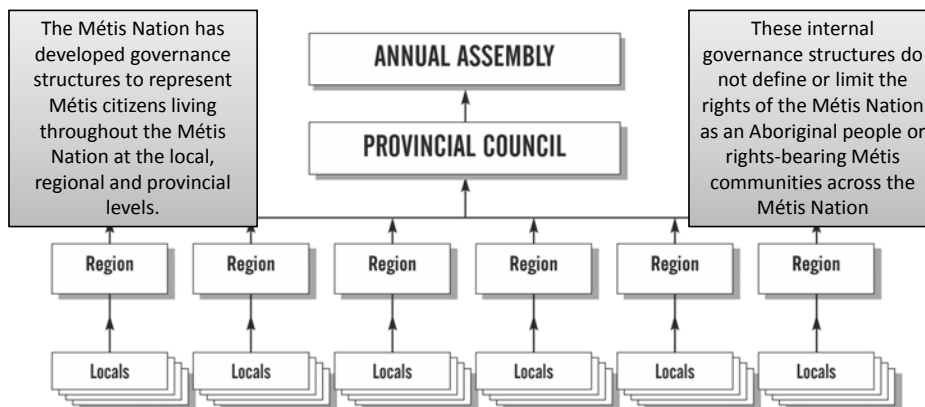
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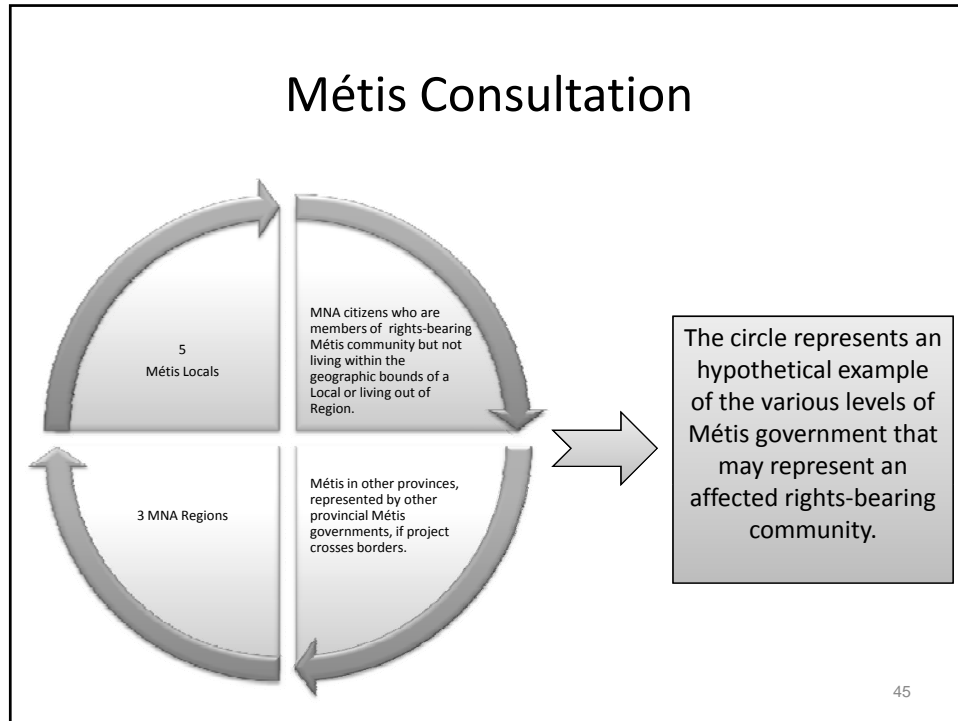
What is the Métis Community?

Case	Description of Contemporary Community	Geographic Scope of Contemporary Community	Approx. km ²
<i>Powley</i>	"... communities and areas surrounding Sault Ste Marie including Batchewana, Goulais Bay, Garden River, Bruce Mines, Desbarates, Bar River, St. Joseph's Island, Sugar Island and into Northern Michigan." <i>Powley (Trial Judgment)</i> , <i>supra</i> , at par. 70	The area described covers over 100 kms to the north and west of Sault Ste. Marie (Batchewana, Goulais Bay) and 100 kms to the south and east of Sault Ste. Marie (St. Joseph Island, Bruce Mines). The Court does not describe how far into Northern Michigan the community extends.	20,000 km ² +unknown km ² into Northern Michigan
<i>Lavolette</i>	"I find that the contemporary rights-bearing community is best described as the Métis community that now lives and uses Northwestern Saskatchewan and includes the settlements of Green Lake and Meadow Lake." <i>Lavolette</i> , <i>supra</i> , at par. 35.	The area described covers approximately 200 kms from east to west (Green Lake to Saskatchewan/Alberta border) and over 220 kms from south to north (Meadow Lake to Ile la Crosse)	44,000 km ²
<i>Belhumeur</i>	"I am satisfied that the evidence shows that the 'regional community' is the Qu'Appelle Valley and environs which extend to the City of Regina." <i>Belhumeur</i> , <i>supra</i> , at par. 206.	The Qu'Appelle Valley runs approximately 350 kms from west to east across southern Saskatchewan (Elbow, Saskatchewan to just over the Saskatchewan/Manitoba border at St. Lazare). The Court did not describe how far the Qu'Appelle Valley's 'environs' extend from north to south, but it definitely includes Regina which is around 90 kms southwest of the Valley.	31,500 km ²

Who Needs To Be Consulted?

MODEL GOVERNING MEMBER GOVERNANCE STRUCTURE





Developing a MNA Consultation Framework

- Currently, many MNA Locals, MNA Regions and the MNA Head Office have limited capacity to respond to the influx of letters from government and industry on policies, proposed developments, environmental assessments, etc. As a result, some important initiatives and opportunities are 'falling through the cracks' and the lack of Métis response is taken as a lack of interest in these issues (which is definitely not the case) and could be used against Métis in the future. A Consultation Framework would address this.
- Rather than having governments and industry develop their own policies or 'ad hoc' approaches to consult the Métis people, a Consultation Framework would provide clarity on how the Métis Nation would like to be engaged and consulted.
- Many Métis elected representatives at the local, regional and provincial levels have stated they want to do the right thing for the Métis community, but they don't know where to begin and don't want to make mistakes that could harm the community in the longer term. A Consultation Framework would allow Métis Nation to develop expertise in responding to and participating in consultation and accommodation processes in order to alleviate these concerns.

Towards A MNA Consultation Framework

- There is a need to build sustained capacity at the local, regional and provincial levels in the MNA in order to effectively deal with consultation and accommodation issues in a sophisticated manner. Project-by-project and year-to-year funding does not accomplish this. A Consultation Framework would focus on building sustained, long-term capacity in this area.
- Métis do not want to fall into challenges faced by other Aboriginal peoples where one local Indian Act Band sees itself as distinct from its neighboring Band. Métis have always believed they are one people, one nation. A Consultation Framework that reflects a nationalist aspiration would be appropriate.
- Métis are mobile. A Consultation Framework should not penalize Métis for moving throughout province or inter-provincially.
- A Consultation Framework would provide opportunities for efficiencies in managing consultation and accommodation processes (i.e. build a clearinghouse of research and maps, development best practices, using established Métis communication tools, etc.).

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What would be Inside an MNA Consultation Framework?

- A Consultation Framework would set out the Métis Nation's principles and values for consultation and accommodation in order to guide relationships with government and proponents.
- A Consultation Framework would set out a process for government and industry to follow when engaging and consulting with the Métis in Alberta. For example, rather than 'reinventing the wheel' every time an MNA Local or MNA Region receives notice from the government and/or a proponent, a mutually agreeable MNA process would be triggered to effectively respond to and assess the information in a timely manner.
- A Consultation Framework would set out a step-by-step internal MNA process on how consultation with the affected Métis rights-bearing community or communities would occur (i.e. how MNA Locals, MNA Regions and MNA Head Office could work together, how information would be provided to potentially affected Métis citizens, how information would be assessed in order to determine research and mapping needs for consultation process, etc.).

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Next Steps



- Decide how to engage Métis citizens from across the province on the duty to consult and accommodate and a Consultation Framework.
- Undertake province-wide community consultations on the duty to consult and accommodate and a Consultation Framework.
- Develop a draft Consultation Framework based on input from consultations.
- Circulate draft Consultation Framework to MNA citizens, MNA Locals, MNA Regions, MNA Provincial Council for review and comment.
- Adoption of MNA Consultation Framework by Métis Nation of Alberta Annual General Assembly.

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