

# DISHONOURABLE CONDUCT: THE CROWN IN RIGHT OF CANADA AND QUÉBEC, AND THE JAMES BAY CREE

Grand Chief Matthew Coon Come

---

For many centuries, the mandate of our Cree elders and leaders was to guide us. We Crees conserved the land, the waters, the animals, and sustained ourselves in an environment that many regard as harsh, but we regard as a paradise and which we must cherish and protect for our children. In the last few centuries, as others came to claim our resources and lands for themselves, we have had to change. One of the biggest changes is that we have had to defend our lands against environmental destruction on an unimaginable scale, and also defend and assert our fundamental rights as a people.

While the land still provides the most employment for the Crees, our environment continues to be threatened by hydro-electric development, large-scale clear-cutting of the slow-growth boreal forests, and mineral development in which there is no gain for the Crees and much loss.

Current political developments in Canada and Québec also threaten Cree rights gravely. In September, 1995 the people of Québec elected a government committed to separating from Canada and becoming an independent country. This government of Québec declared, in a law, that if a simple majority of Quebecers voted Yes in a referendum on October 30, 1995 it would act unilaterally to separate from Canada.

The referendum result, in which the No forces won, has led the Government of Québec to now turn to economic issues. Economic issues also are of concern to the Cree, and I discuss these toward the end of this essay. But the continuing threat posed by the sovereigntist forces also must continue to be addressed by the Crees. That is, for the most part, the main object of this essay. In Part One, I describe our opposition to the Québec government's proposed laws

to achieve sovereignty released in advance of the October 30, 1995 vote. In Part Two, I describe the process leading toward the near unanimous result in the Cree referendum, withholding our consent as a people to be separated from Canada. Finally in Part Three, I discuss the Cree position with respect to post-referendum developments, including the federal government's declaration that Québec constitutes a "distinct society."

## I

A unilateral declaration of independence by the government of Québec would undemocratically change or terminate our relationships with the government, Parliament and people of Canada. A unilateral declaration of independence by the government of Québec would attack our fundamental right as a people to determine our own political future; it would constitute fundamental breach and repudiation of the terms of the James Bay and Northern Agreement of 1975; and it would be in violation of fundamental principles of democracy, consent and human rights.

A few weeks prior to their referendum, the government of Québec released its "Declaration of Sovereignty," the preamble to the bill that would bring about the independence of Québec and the break-up of Canada. This document, with its long declaration, was a deep injury to the original inhabitants of this land, to *Eeyouch*, our people the Crees. Once again, it was declared in this preamble that Canada has "two founding peoples." The many First Peoples in Québec still gather, hunt, travel and are born and are buried, just as we have for thousands of years, in places that we named: Chisassibi, Mistissini, Whapmagoostui, Kanawahke, Povugnituk, Manicouagan, Kuujjuaq, Wendake. We first peoples, the Crees, the Inuit, the Mohawks, the Huron, the Innu, are here as we have

always been. And yet this myth, this terrible lie of two founding peoples, was proposed to be entrenched in the instruments of a new Québec state.

It was claimed in this preamble that the history of this place began four hundred years ago, "at the dawn of the 17th century." This is not the history we Crees have of our territory. Our Elders have taught us knowledge and history of our people that is *thousands of years old*. Our history did not begin when the Europeans arrived in our land.

Once again, it was implied in this preamble that it is these people, who have only been here some hundreds of years, have always been in this place, "from Ungava to the American border." There are Crees alive today whose grandparents never saw a white man anywhere in Ungava. We Crees are still the only permanent inhabitants, and are the majority residents, of our traditional lands. (I am not yet 40 years of age, yet even I have been in *Eeyou Astchee* longer than the government of Québec!) This shameful declaration denies our existence. This shameful declaration diminishes our status and rights — it is an outright and intentional lie, repeated in 1995 by people who should know better.

The separatists' sovereignty Bill, which would have been enacted in the event of a Yes vote, also was tabled. This Bill was as shameful as the preamble that introduced it. Once again, provisions were being proposed that would do more to diminish our rights than to recognize or advance them. Our right to self-government, our treaty rights, our right to participate in development were all mentioned in the sovereignty Bill. But they were all diminished — all made subject to Québec's ownership, jurisdiction, territorial integrity and control. This law was a fraud on Aboriginal peoples and those who support the full and meaningful recognition of our rights. Yes, the concepts were there in the text, but their actual formulation was a denial rather an affirmation of them. For Aboriginal peoples in Québec, this was a cynical law. Its provisions were a plain attempt to dominate and subjugate our societies, cultures and ways of life.

The provisions of this Bill with respect to our rights were a fraud on the Aboriginal peoples and on those in the international and national communities who are concerned about our rights. These provisions did not guarantee, enhance or affirm our rights. On the contrary, they diminished and denied the status and rights of all Aboriginal peoples in Québec. What is proposed to be done to the Aboriginal peoples by

the separatists would never be accepted by Québec if it were attempted by Canada.

I ask: how can people who claim these rights deny these same rights to us? Where is the logic? So how is it that this critical debate is being conducted as though the Aboriginal Peoples do not exist? How is it that in 1995 — after years of oppression, after the 1969 White Paper, after 1982, after all of the constitutional conferences, after Meech, Oka and Charlottetown — that our fundamental rights can be so easily disposed of?

Is this the hidden agenda: to forcibly incorporate us into an independent Québec state, and to severely diminish our rights, such as they are, for once and for all? I wish someone would tell us we are wrong, but they cannot — the preamble and the sovereignty Bill are there for anyone to read. We ask: "How can this be?" In 1670, King Charles of England gave much of Canada — all the land that sheds water into Hudson Bay — to the Hudson's Bay Company. He named this land Rupert's Land after his cousin Rupert. Nobody advised or requested the consent of the real owners of these lands, which included *Eeyouch*, our people the Crees.

In 1870 another Royal colonial grant was made. This time Rupert's Land was granted to Canada, a country that was just three years old. Again no one spoke to us or told us. Then again in 1898 and 1912, Rupert's Land was transferred once more, this time by Parliament to a number of provinces including Québec. Again nobody thought to inform, let alone consult us. Interestingly, a binding condition was attached to the 1898 and 1912 transfers, including the transfers to Québec. It was stipulated that the rights of the aboriginal peoples affected by the transfers be recognized by Québec, and surrenders obtained with the approval of the Governor-in-Council. The lands Québec claims to have brought into Canada never included *Eeyou Astchee* — the Cree Territory. It can be seen that our lands were never historically a part of the entity called New France or Québec.

No one spoke to us for another sixty or so years, until 1970, when once again they came to flood our land, and still they did not speak to us. This was when we learned that as far as governments and the courts were concerned, our rights had been disposed of by a king in England in 1670! Judging from the present Québec independence debate, everyone assumes — just as they have for hundreds of years — that we can

be passed along from Crown to Republic just like before.

In 1975, under circumstances of oppression and duress, we entered into an Agreement with Canada and Québec, along with the Inuit. In the present context, it is important to point out that this Agreement gives rise to a number of treaty rights pursuant to section 35 of the *Constitution Act, 1982*. The Agreement states that it can only be amended with the consent of all of the parties including Canada and the Crees; that the Crees shall have the rights of Canadian citizens, and shall have access to all benefits, programs and services as are made available to Indians and to other Canadian citizens by the federal government. The Agreement provides for ongoing federal involvement in Northern Québec in such areas as the environment, programs and services, education, and justice; yet it has no termination clause, and is therefore perpetual and permanent unless amended with the consent of all of the parties. The Agreement was ratified by laws passed by both the Parliament of Canada and the National Assembly of Québec, led by then Premier of Québec René Lévesque, in 1976. The Parti Québécois is therefore in no position to claim that this was the work of another party, one which tricked Quebecers into a federalist trap.

The treaty comprises a division of powers between three orders of government in a federal system — federal, provincial and Aboriginal. Under this system we have access to the Supreme Court of Canada, a special relationship with Parliament and the government of Canada, and we have a historical fiduciary relationship with the federal Crown. No matter what it claims, Québec could never assume these obligations and powers with regard to our rights.

Is this treaty perfect? Far from it. It is inequitable, and few of its provisions treat us justly. It has been interpreted in a narrow and mean-spirited way, rather than according to its spirit and intent as we understood it. We are forced to wait decades for its promises to materialize. We have to go to court endlessly to enforce its terms. But a treaty it is, nevertheless. The rights we gained are all treaty rights under the Canadian constitution, which is still the supreme law of the land, binding upon Québec, and binding upon Canada. Or is it only Indians who must respect the rule of law?

We understand these rights to mean that we have a permanent connection with two other levels of government, the federal government, and the govern-

ment of the Province of Québec within Canada. We invite the separatists' scholars and thinkers to join our debate. So far, we have not heard a single argument against our case that is not standing on a foundation of double standards and colonial misconceptions about our rights. We hope that the separatists have the honesty and courage to discuss these issues with us, but to date they have not.

I do not mean to praise the federalists with silence on their policies and actions. The federal government's apparatus for dealing with Indians and the policies it pursues across this country are to this day destructive and discriminatory against Aboriginal peoples. The Crees are clear on this point: there is an urgent need for fundamental change. But the fundamental changes currently under way are being undertaken without our consent as a Nation and as a People. And we will not easily exchange our treaty relationship with two other orders of government, federal and provincial, for a precarious relationship with a unitary state whose first official Act is a massive denial of Aboriginal and treaty rights.

Our fundamental rights are simply not for sale. And they are not for the taking — in October 1995, or ever.

## II

My people, *Eeyouch*, the James Bay Crees, voted on October 24, 1996 not to be separated from Canada. We spoke clearly. We will not be separated from Canada. We withheld our consent. The message was clear: We Won't Go.

Let me state at the outset, though, that we Crees understand the aspirations of Quebecers. We fully respect their right to hold consultative referendums and determine their future. But I must also state that this cannot, and will not, be done at the expense of our rights, or of the rights of other peoples in Canada. We Cree have the self-same right to our aspirations and to determine *our* future.

Let me explain the circumstances under which this choice was made. In October, it is already winter in James Bay. It is already snowing in James Bay, and the hunting season is under way. In James Bay, from September to spring, we Crees are out hunting on the land. Our communities are often ghost-towns at this time of year. On October 24, 1995, things were different. From hundreds of kilometres away, people made their way back to our communities. In

Mistassini, in Chisassibi, in Whapmagoostui and in Wemindji, they made their way to our polling stations in our schools and our meeting-halls. There were line-ups, and some people waited an hour or two to vote.

This referendum was different — no one was left out. There were voting stations in every community. There were voting stations outside of our territory, in Montreal, in Val d'Or, in Senneterre, in Ottawa, and even in North Bay in Ontario, where our post-secondary students are studying. And this referendum was even more different than that. There were Cree families in their hunting camps that were too far away in the bush to get back to the communities. Our territory is not covered by a network of roads and telephone services. These families were each contacted by radio. They were asked to provide their coordinates and to stay in their camps between Friday the 20th of October and Tuesday the 24th. And in order to ensure that every Cree had a chance to vote, we chartered three helicopters, which flew thousands of kilometres across our territory.

Imagine the challenge Mr. Parizeau would have faced if he had called a referendum to be held at the end of July. We were forced to do the equivalent: our referendum could not have been held at a more difficult time. And yet, under these conditions, over 77 per cent of eligible Crees participated in our vote. More importantly, they made their choice abundantly clear.

The Cree people were almost unanimous: over 96 per cent of my people stated their choice: "We Won't Go." What does this mean? The separatists say that our Cree referendum is all very well, but it does not count. We Crees and our lands, they say, are to be forcibly included in any future Yes majority vote. And then, they state calmly, we Crees and our territory are to be forcibly included, if necessary by force, in a sovereign Québec. Well let me say calmly in reply that the James Bay Crees spoke clearly: "We Will Not Go."

A few days prior to the vote, the Parti Québécois chief spokesman on Aboriginal issues, Mr. Cliche, said that the Crees would be violating the law, violating international law, if we resisted our inclusion in his independent Québec. I find this truly ironic. Here we have a separatist government of a province contemplating an illegal and unconstitutional secession. The Superior Court of Québec ruled that the P.Q.'s Bill 1 is illegal and unconstitutional and that its plans are a grave threat to the rights and freedoms of Québec citizens.<sup>1</sup>

My people have spoken. We are no longer prepared to be treated like cattle in a field. We are no longer prepared to be treated like a second-class people, with second-class rights. We showed at Meech, and we showed at Charlottetown, that the politics of exclusion and the politics of denial are no longer acceptable. My people expressed their will. We will no longer allow decisions to be made by others that are ours, and only ours, to make.

I am always asked (so I may as well answer the question here), "Will the Crees become violent?" We are not a violent people. We oppose the use of force, and have always found other means of resolving our differences. The use of violence and force is against our most fundamental beliefs. We Crees are committed to working together with Québécois and other Canadians, to building a country that is responsive to all of our aspirations and priorities, and fully respectful of *all* of our rights. But we will not be passive in any strategies of inequality and unilateral action. We know our rights. We know we will receive the support of many Quebecers, and the support of other Canadians. We will not be forcibly included into a sovereign Québec. Our traditional territory, *Eeyou Astchee*, will not be forcibly removed from Canada and included in a sovereign Québec. Our human rights will be upheld.

### III

The arguments in this debate are now reaching surprising heights. I learned that representatives of the government of Québec are now stating internationally that certain of the Aboriginal peoples in Québec are not indigenous to that land, that they came from other foreign places, such as Ontario. Also, it appears that the government of Québec simply has stopped referring to the region in which we live as "James Bay," using instead the name "Radissonie."

It is clear that by suddenly renaming our lands after a French explorer, the government of Québec is hoping to avoid and obscure questions about the status of our lands in a future independent Québec. And by saying that some of the First Nations in Québec are from somewhere else, they are clearly hoping to export this thorny problem of our Aboriginal status and rights.

I would like to inform the government of Québec that we Crees did not come from anywhere else. Actually, we do not refer to ourselves as the Crees, but rather as *Eenouch*, the People. The Creator placed

us where we have always been, in *Eenou Astchee*. This is the real name of our land. Not Nouveau Québec, not Radissonie, not even James Bay, but rather *Eeyou Astchee*.

Matters of self-determination can no longer be decided or imposed. These changes cannot be made without our free and informed consent. Now we are reminding the world that since time immemorial *Eenouch* — the James Bay Crees — have lived in *Eenou Astchee*. We are reminding the world that our status as a people has always been, and is, self-evident to us. We are pointing out that this status is recognized in the Canadian constitution, and in constitutional instruments such as the Royal Proclamation of 1763. We are reminding the world that according to fundamental precepts of human rights, we have the right as a people to determine our own destiny, and the right to choose to continue our treaty relationship with Canada.

In a moment of panic during the October 1995 referendum campaign, Prime Minister Chrétien made three promises to the people of Québec. He promised that he would divest the federal government of jurisdiction over labour market training. He promised he would confer a constitutional veto on Québec. And he promised to recognize Québec as a distinct society. With respect to labour market training, we understand the provinces' desire for far greater control over what goes on in their own backyards. These are arguments that we have been making for years with respect to our inherent right to self-government.

We examined the veto bill that was passed in such a rush over the New Year after the referendum, in which British Columbia ended up with a veto it did not want. We were very concerned and therefore proposed an amendment that would have preserved the right of the federal government to propose constitutional amendments in such core areas as the Charter, the territorial integrity of Canada, and Aboriginal and treaty rights. The Crees' and other constitutional authorities in government and in the universities judged that this was a sensible amendment to propose, given that the present government of Québec, to which the veto was being given, has the goal of separating from Canada. The federal government refused to consider our amendment.

With respect to the resolution recognizing Québec as a distinct society, we had similar fundamental problems. As I have mentioned, we Crees are not opposed to further constructive recognition of Québec's unique

role and place in Confederation. But we Crees and other Aboriginal peoples in Québec cannot allow ourselves to become subject to a distinct society clause in the Canadian Constitution.

When the government of Québec first passed its language legislation in the 1970's, Aboriginal peoples in Québec were made subject to its terms. Suddenly, after thousands of years of being Cree or Inuit societies in Northern Québec, we were to be French societies, and the riot police were sent to Aboriginal communities in the north to enforce what seemed to us to be a distinctly unacceptable law. Only after it became an international embarrassment, did Premier René Lévesque back down and exempt Aboriginal peoples from the terms of his French language laws.

Since then, Aboriginal peoples in Québec have experienced many other attempts by successive separatist governments to subjugate our status and rights to the legal, economic, social and cultural approaches of the Québec distinct society. For this reason, we fought for and obtained clauses in the Meech Lake and Charlottetown Accords that would have ensured that any recognition of Québec as a distinct society would not be at the expense of our Aboriginal and treaty rights.

Unfortunately, Prime Minister Chrétien chose to ignore these precedents in the distinct society resolution that he rushed through Parliament early in the New Year. This distinct society resolution would result, if it was constitutionalized, in the creation of two classes of Aboriginal peoples in Canada: those Aboriginal peoples who are subject to the distinct society provisions in Québec, and those outside of Québec who are not. This would leave Québec in a position to argue in court that its language laws, or our rights to our lands, or the legal characterization of Aboriginal peoples as peoples, are an obstacle to the preservation of its distinct society. This is a situation that would diminish our rights, and is obviously unacceptable to us.

But the impact of any distinct society initiative on Aboriginal rights is clearly connected to the broader "national interest." We Crees have been stating since 1991 that if Québec secedes from Canada, we Crees have the right not to be forcibly included into a sovereign Québec, that we have the legal and constitutional right to remain in Canada, with our ancestral lands. For more than three years before the 1995 referendum we called upon the federal government to declare that if Quebecers have a right to determine their future,

then certainly so do the James Bay Crees. We undertook a poll, and discovered that if the federal government would declare that it would defend our right to choose to remain in Canada, up to a quarter of the Yes voters in Québec would change their minds or become undecided. But for some reason the federal government refused to declare that it would uphold the Crees' treaty rights and the Constitution of Canada.

Actually, someone in Ottawa went so far as to leak an unsigned Privy Council memo to the press, on the same day last September when we released our study on our rights.<sup>2</sup> This memo, which could just as well have been written by the separatist government of Québec, stated that the best policy would be for the federal government to stand at the border if Québec secedes, and wave the Crees goodbye. It took the near-death experience of October 30, 1995 to change the federal government's mind, and so, in the New Year, we suddenly saw Mr. Chrétien and Mr. Dion and Mr. Irwin saying that the Crees have the right to choose to remain in Canada with our ancestral lands.

We Crees did not go looking for this debate or these problems. We are not trying to secede from anyone. But we now understand that we and our lands are perhaps a cornerstone of this country. Our Aboriginal and treaty rights will be diminished if a distinct society provision fails to exclude our rights from its scope. Our Aboriginal and treaty rights will be diminished if they are not elaborated and recognized at the very same time as any constitutional provisions are enacted to meet the perceived needs of Québec.

If our Aboriginal and treaty rights are diminished in this way, our ability to retain and strengthen our links with Canada will also be diminished. There is an irony that the separatists, who are threatening to leave, are being recognized as a founding people, while Aboriginal peoples, who are threatening to stay, are being denied the status of founding peoples. I defy anyone to say that we are not among the founding peoples of Canada.

The recent veto legislation enacted in favour of the Parti Québécois government of Québec will make constitutional amendments to preserve national unity more difficult than ever. For this reason, the existing Aboriginal and treaty rights of the Crees on our ancestral lands have become critically important to national unity. I believe it would be negligent in the present secessionist context, if a distinct society clause were put in the Constitution without ensuring that

Aboriginal and treaty rights are not in any way diminished or curtailed.

We were not able to achieve this goal in the veto legislation and distinct society resolution passed in Parliament in December and January. But this was only symbolic legislation. A failure to do so in the next constitutional round will not only harm the Crees, it could well harm all Canadians who are in favour of national unity and of fundamental rights.

Regardless of which scenario may eventually take place in Canada, the James Bay Cree People — *Eenouch* — take the firm position that it will determine its own future. Neither Canada nor Québec has the legal or moral authority to forcibly subjugate the Crees or other indigenous peoples to a new sovereign power. The Crees and other Aboriginal peoples have rights of self-determination that cannot and must not be denied.

Neither Canada nor Québec has behaved honourably to Aboriginal peoples. Nevertheless, we Crees feel that our rights and interests will be best protected if we remain within Canada, in the context of a broadly-based, multicultural federal state. This decision is based on realism. This decision is based on unease about being included into a unitary state that was built on a foundation of ethnic nationalism and the denial of our political, cultural and other rights. It is also based on the provisions of the treaty we entered into in 1975.

You will surely understand when we Crees state that we have never given up or surrendered the dignity, or the sovereignty, that is the gift of the Creator to every people. These rights cannot be extinguished or taken away. They mean that a people cannot be simply passed with the land.

The separatists have warned that if the right of the Crees to choose to remain in Canada is affirmed, then Aboriginal peoples elsewhere will also have a right to secede. But it should be clear by now that we Crees are not secessionists. Along with all other Aboriginal peoples in Canada, we are seeking to improve and strengthen our relationship with this country and with the province in which we live on the basis of fairness, equity, and a real partnership. This is an argument raised by the separatists to draw attention away from the real threat to Canada, which is posed by them.

I have mentioned above our treaty with Canada and with Québec, now twenty years old. When it was signed, it was hailed by all involved as the first modern land claims agreement in Canada. This Agreement brought the Crees certain benefits, and many of its features have been incorporated into and improved upon in more recent treaties. However, our treaty contains certain provisions, over which we had no control, that bring dishonour upon the Crown. And we have learned that, when the signing is done but before the ink is dry, the implementing and upholding of treaty promises is full of difficulty. In our case, we met our side of the bargain, by sharing our lands and resources. But the other parties have failed to do so, according to their own judges', and commissions', and auditor-generals' reports. And now it is proposed that the treaty provisions that are to Québec's advantage will survive, while those that are to ours, namely our relationship with Canada, will not, if Québec secedes.

I have mentioned our efforts to preserve our lands and waters in the face of destructive development. Mainstream Quebecers and Québec business people are now relieved that the Crees prevented Hydro-Québec from building a 15 to 20 billion dollar megaproject, using borrowed funds, to produce electricity for which there will be no market for decades to come. The environmental questions we were raising made economic sense, as they so very often do.

The economies of the non-native communities in which the Crees' small airline lands and in which we Crees do business would be in poor shape without our participation. Still, too many Crees are unemployed and without adequate housing or services, because the approach is mostly one of government hand-outs and not genuine partnership. If governments and non-native communities would only be expansive in their approach to sharing resources and sharing the land, then the economies of the provinces and the country as a whole would feel the benefit many times over.

The James Bay Crees need one thousand housing units, just to deal with our backlog, and we will need many more as our population expands. If we are left appealing to the government of Canada for funds, these units will never be built. But if we had only a small share of the resource revenues flowing from our lands, flowing mostly out of the country, the Québec economy would experience a small boom.

Canadian companies go halfway around the world in search of development and market opportunities. Aboriginal peoples in Québec, the Maritimes, Ontario,

the prairies, the West and in the North, constitute a province of China right in Canada's backyard. Give us the resources and tools, and we will need your products and services to become full participants in the benefits of living in this land.

In 1992, the High Court of Australia did the unthinkable, and ruled in the *Mabo* case that: "the fiction by which the rights and interests of indigenous inhabitants in land were treated as non-existent was justified by a policy which has no place in the contemporary law of this country."<sup>3</sup> In one stroke, the legal foundation for non-Aboriginal title to Australia was gone. And yet the Aborigines did not try, or even want to "take it all." They wanted honourable negotiations, and a rational process of sharing and coexistence.

In the end, it is clear to me, to paraphrase the words of the president of General Motors, that what is good for the Aboriginal peoples in Canada will be good for Canada. This is especially true in the context of Québec and questions of national unity, where the ongoing failure of the federal government to uphold the Crees and Inuits' Aboriginal and treaty rights almost cost it the country. These policies with respect to our rights are still very much alive, as Ottawa insiders tinker with the constitution in ill-advised ways.

But this is also true in Ontario, Saskatchewan, British Columbia, in the North, and elsewhere. I know that all Aboriginal peoples feel the way we Crees do when we say, to Quebecers and other Canadians alike: "Walk honourably with us. Share honourably with us. Deal honourably with us. And this will be good for us all. □"

### Matthew Coon Come

Grand Chief of the Council of the Crees (of Eeyou Astchee) and Chairman of the Cree Regional Authority.

This essay draws on a submission made to the Cree Eeyou Astchee Sovereignty Commission (21 September, 1995), remarks made at a press conference announcing the results of the Cree Referendum (25 October, 1995), and a presentation made to the First Nations Summit and the Laurier Institution in Vancouver, B.C. (26 March 1996).

#### Endnotes

1. *Bertrand v. Quebec (P.G.)* (1995), 127 D.L.R. (4th) 408.
2. The study is: *Sovereign Injustice: Forcible Inclusion of the James Bay Crees and Cree Territory into a Sovereign Québec* (Nemaska: Grand Council of the Crees, 1995).
3. *Mabo et al. v. State of Queensland* (1992), 107 A.L.R. 1 at 28-29 (H.C.).