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B A R R I S T E R S A N D S O L I C I T O R S

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May 8, 2025

Sent via E-mail

Canadian Human Rights Tribunal
240 Sparks Street, 6th Floor West
Ottawa, ON K1A 1J4
Attention: Ms. Judy Dubois, Registry Officer

Dear Ms. Dubois:

Re: FNCFCS and AFN v. AGC
Your File No. T1340/7009

We write on behalf of Chiefs of Ontario (“COO”) regarding the motion for Interested Party status made jointly by Chippewas of Georgina Island First Nation (“CGI”) and Taykwa Tagamou Nation (“TTN”). This correspondence is intended to satisfy the Panel’s April 24, 2025, direction to parties to file submissions on the joint motion aspect of the Interested Party status motions they support by May 8, 2025.

COO acknowledges that, as First Nations in Ontario, CGI and TTN stand to be affected by the adoption and approval of the Ontario Final Agreement (the “OFA”). Ultimately, it is for the Tribunal to assess the merit of their application for Interested Party status, considering several key factors, including the assistance the applicants could provide to the Tribunal in making its decision on the joint OFA approval motion, the distinct perspectives the applicants offer, and any impacts on procedural efficiency.

Should the Tribunal grant Interested Party status to CGI and TTN, COO will leave it for the Tribunal to decide the level of participation that should be afforded to them as Interested Parties, subject to the following qualifications. COO submits that if granted Interested Party status, CGI and TTN should not be permitted to supplement the record on the merit of the proceeding; delay the hearing of the joint OFA approval motion in any way, including because of party or counsel availability; nor duplicate the submissions of any other party. Further, COO submits that their participation should be required to conform to reasonable time limits and page limits as set by the Tribunal.

Lastly, COO also asks that, should the Tribunal grant Interested Party status to CGI and TTN, COO be allowed additional pages in its written submissions or provided with a separate opportunity to reply to any submissions the parties make.

If there are any questions about COO's position, please advise and we will do our best to address them.

Yours truly,
Olthuis, Kleer, Townshend LLP



MAGGIE WENTE
PARTNER

MW/slz

- c. Julian Falconer, Meaghan Daniel, Jordan Tully – *Counsel for Nishnawbe Aski Nation*
Dayna Anderson, Kevin Staska, Sarah-Dawn Norris, Meg Jones, Samantha Gergely, Cara Verhaeghe, Paul Vickery - *Counsel for Canada*
Anushumala Juyal and Khizer Pervez - *Counsel for CHRC*
David Taylor, Sarah Clarke, Kiana Saint Macary - *Counsel for FNCFCs*
Peter Mantas, Gabrielle Cyr - *Counsel for AFN*
Justin Safayeni and Stephen Aylward - *Counsel for Amnesty International*