



Department of Justice
Canada

Ministère de la Justice
Canada

Prairie Regional Office
(Winnipeg)
National Litigation Sector
601-400 St. Mary Avenue
Winnipeg, MB R3C 4K5

Bureau régional des Prairies (Winnipeg)
Secteur national du contentieux
400, avenue St. Mary, pièce 601
Winnipeg (Manitoba) R3C 4K5

Telephone/
Téléphone: 204-294-5563
Fax /Télécopieur: 204-983-3636
Email/Courriel: Dayna.Anderson@justice.gc.ca

Via Titanfile

Our File Number: LEX-500219273

December 22, 2025

Canadian Human Rights Tribunal
240 Sparks Street, 6th Floor West
Ottawa, Ontario K1A 1J4

Dear Members Marchildon and Lustig:

**Re: First Nations Child and Family Caring Society of Canada et al. v.
the Attorney General of Canada et al.
Tribunal File: T1340/7008
2025 CHRT 80 – Canada’s National Plan for Long Term Reform**

In accordance with the Tribunal’s August 20, 2025 Ruling, 2025 CHRT 80, please find attached the following:

- Canada’s National Plan on Long-Term Reform and Requested Remedies Outside Ontario;
- Affidavit of Duncan Farthing Nichol, affirmed December 22, 2025;
- Affidavit of Kyle McKenzie, affirmed on December 22, 2025;
- Affidavit of Kirsten Mattison, affirmed on December 22, 2025;
- Affidavit of Richard Goodyear, affirmed on December 22, 2025; and
- Affidavit of Lisa Smylie, affirmed on December 22, 2025.

Canada’s National Plan contemplates providing the Tribunal with updated evidence in October 2026, with the matter being heard and decided before April 1, 2027. Canada is endeavouring to work with the other parties on a mutually agreeable procedural schedule towards a timely hearing. In the meantime, we suggest that a Case Management Conference Call in early January 2026 may be of assistance.

Sincerely,

Dayna Anderson
Senior General Counsel

Encls.

Canada

CC:

David Taylor and Kiana Saint-Macary
Conway Baxter Wilson LLP
400-411 Roosevelt Avenue
Ottawa, Ontario K2A 3X9
Email: dtaylor@conwaylitigation.ca
ksaintmacary@conwaylitigation.ca

Sarah Clarke and Robin McLeod
Clarke Child and Family Law
36 Toronto Street, Suite 950
Toronto, Ontario M5C 2C5
Email: sarah@childandfamilylaw.ca
robin@childandfamilylaw.ca

Maggie Wente, Sinéad Dearman, Benjamin Brookwell, Jessie Stirling-Voss, Ashley Ash, Katelyn Johnstone and Jenna Rogers
Olthuis Kleer Townshend LLP
250 University Avenue, 8th Floor
Toronto, Ontario M5H 3E5
Email: mwente@oktlaw.com
sdearman@oktlaw.com
bbrookwell@oktlaw.com
jstirling@oktlaw.com
aash@oktlaw.com
kjohnstone@oktlaw.com
jrogers@oktlaw.com

Peter N. Mantas, Gabrielle Cyr and Clive Ngan
Fasken Martineau DuMoulin LLP
55 Metcalfe Street, Suite 1300
Ottawa, Ontario K1P 6L5
Email: pmantas@fasken.com
gcyr@fasken.com
cngan@fasken.com

Anshumala Juyal and Khizer Pervez
Canadian Human Rights Commission
344 Slater Street, 8th Floor
Ottawa, Ontario K1A 1E1
Email: Anshumala.Juyal@chrc-ccdp.gc.ca
khizer.pervez@chrc-ccdp.gc.ca

Julian N. Falconer, Asha James, Shelby Percival and Meghan Daniel
Falconers LLP
10 Alcorn Avenue, Suite 204
Toronto, Ontario M4V 3A9
Email: julianf@falconers.ca
ashaj@falconers.ca
shelbyp@falconers.ca
meghand@falconers.ca

Justin Safayeni and Stephen Aylward
Stockwoods LLP
TD North Tower
77 King Street West, Suite 4130
Toronto, Ontario M5K 1H1
Email: justins@stockwoods.ca
stephenA@stockwoods.ca