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Language Regimes in the Provinces and Territories

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(Background Paper)

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CONTENTS

1	INTRODUCTION.....	1
2	PROVINCIAL AND TERRITORIAL LANGUAGE REGIMES	1
2.1	General Provisions.....	1
2.2	Education	2
2.3	Justice	3
2.4	Municipalities.....	3
2.5	Language Ombudsman	3
2.6	Government Services Offer	4
2.7	Parliamentary Business	5
2.8	Minority-Language Communities	5
3	INTERGOVERNMENTAL COOPERATION.....	6
3.1	Federal–Provincial Cooperation.....	6
3.2	Interprovincial Cooperation	7
3.3	National Cooperation Mechanisms.....	7
3.4	International Cooperation Mechanisms	8
APPENDIX – LANGUAGE REGIMES IN THE PROVINCES AND TERRITORIES		

LANGUAGE REGIMES IN THE PROVINCES AND TERRITORIES

1 INTRODUCTION

Canada's Constitution contains no provision relating to jurisdiction over language. In a 1988 decision, the Supreme Court of Canada affirmed, "Language is not an independent matter of legislation but is rather 'ancillary' to the exercise of jurisdiction with respect to some class of subject matter assigned to Parliament or the provincial legislatures by the *Constitution Act, 1867*."¹ The power to legislate with regard to language therefore belongs to both the federal and provincial levels of government, under their respective legislative authorities.

The provinces and territories play an important role in the protection of linguistic minorities in sectors falling under their exclusive or shared jurisdictions. Studies have highlighted the efforts made by the provinces and territories to support the development of official-language minority communities.² Practices are continually evolving, as evidenced by the coming into force in 2013 of the *Official Languages Act* and the *Inuit Language Protection Act* in Nunavut and review in recent years of the language regimes in New Brunswick and Prince Edward Island.³ With the adoption of a policy on French-language services in October 2015, Newfoundland and Labrador ceased to be the only province, along with British Columbia, that did not have a legislative, policy or regulatory framework in place for such services.⁴

This document summarizes the provincial and territorial language regimes as well as current practices in the intergovernmental collaboration sector. The infographic in the appendix provides a visual presentation of provincial and territorial legislation and governance structures dealing with official languages, and identifies the sectors in which the status of the minority language is recognized.

2 PROVINCIAL AND TERRITORIAL LANGUAGE REGIMES

2.1 GENERAL PROVISIONS

Language regimes vary significantly from one province or territory to another. Only Quebec and Manitoba were subject to linguistic obligations when they entered Confederation. In 1969, New Brunswick adopted the first *Official Languages Act*.

Today, every province and territory except British Columbia has implemented measures to recognize the official languages or the provision of French-language services.

- Three provinces have entrenched language provisions in the Constitution: New Brunswick, Quebec and Manitoba.

- Across the country, different types of legislative measures are in place. New Brunswick, Ontario, Nova Scotia and Prince Edward Island have legislation that sets out the services that must be provided in French. The legislation in New Brunswick also proclaims English and French to be the official languages of the province. Language statutes in the three territories recognize more than two official languages. In Alberta,⁵ Saskatchewan and Quebec, language legislation recognizes only one official language and restricts the use of the minority language to very specific contexts.
- In addition to existing legislation, policies have been adopted in New Brunswick, Yukon and the Northwest Territories. Policy measures alone exist in Manitoba,⁶ Saskatchewan, and Newfoundland and Labrador as frameworks for offering French-language services.
- Regulatory measures, mainly related to the provision of services to the public, have been adopted in a number of cases: Nova Scotia, New Brunswick, Prince Edward Island, Ontario and the Northwest Territories. In Alberta, a regulation related to court proceedings is in place.
- Three jurisdictions have introduced strategic plans to ensure linguistic obligations are met: New Brunswick, Nunavut and the Northwest Territories.
- A review timeframe is set out in the legislation of New Brunswick,⁷ the Northwest Territories⁸ and Nunavut.⁹
- The three territories' Acts cannot be amended, repealed or defeated without the assent of the Parliament of Canada.

In addition to these general provisions, the provinces and territories have adopted specific linguistic measures relating to such sectors as education, justice, municipal affairs, complaints management, government services offer, parliamentary business, and minority language communities.

2.2 EDUCATION

With regard to education, every province and territory has implemented legislative measures to ensure compliance with section 23 of the *Canadian Charter of Rights and Freedoms*.¹⁰ Section 23 guarantees the right of parents to have their children receive primary and secondary school instruction in the minority language, where numbers warrant. It also guarantees parents the right to manage the minority-language schools.

Since 1970, the federal government has offered financial support to provinces and territories to cover the additional costs incurred for minority-language education and second-language instruction. A protocol signed between the Government of Canada and the Council of Ministers of Education (Canada) governs the management of funding in education. Each province and territory establishes its own action plan identifying funding commitments and performance indicators.¹¹

Nunavut's case in terms of language rights in education is unique, since the *Inuit Language Protection Act* includes provisions for instruction in the Inuit language to the territory's population.¹²

2.3 JUSTICE

Judicially, section 530 of the *Criminal Code*¹³ guarantees the right of every accused to be tried in his or her language of choice for criminal proceedings. The provinces and territories, which are obligated to meet this requirement, have, for the most part, implemented legislative provisions to that effect, and implemented other measures to clarify the language requirements in their courts.

- In some cases, provisions recognizing the right to use French before the provincial courts are part of the official languages legislation: Saskatchewan, Alberta¹⁴ and the three territories.
- In one case, separate legislation has been adopted recognizing the status of French before the provincial courts: Ontario.
- In other cases, these rights are entrenched in the Constitution: New Brunswick, Quebec and Manitoba.
- In other cases, no provisions exist on the status of French in the provincial courts: Nova Scotia, Newfoundland and Labrador, British Columbia¹⁵ and Prince Edward Island.¹⁶

2.4 MUNICIPALITIES

At the municipal level, Quebec, Ontario¹⁷ and New Brunswick have adopted language regimes that recognize official-language communities in a minority setting. Nunavut has established Inuit language rights and duties at the municipal level in its *Inuit Language Protection Act*. Under its *Official Languages Act*, Nunavut also prescribes the offer of communications and services by a municipality in English, French or Inuit where there is a significant demand. Elsewhere in Canada, certain municipalities have been given bilingual status or provide services in both official languages; this is the case in Prince Edward Island, Nova Scotia, Manitoba, Saskatchewan, Alberta and the Northwest Territories.

In some provinces, municipalities have formed associations to ensure that services in French are preserved and delivered. These include the Francophone Association of Municipalities of Ontario, the *Association francophone des municipalités du Nouveau-Brunswick* and the Association of Manitoba's Bilingual Municipalities.

2.5 LANGUAGE OMBUDSMAN

Two provinces (Ontario and New Brunswick) and two territories (Northwest Territories and Nunavut) have established a language ombudsman. The ombudsman's role is to ensure compliance both with official languages legislation and with measures regarding the provision of French-language services in a minority setting. Informal discussions between the provincial/territorial ombudsmen and the federal Commissioner of Official Languages may occur. Since March 2013, there has been a formal national cooperation structure in the form of three memoranda of understanding – between the federal commissioner and each of his counterparts in

Ontario and New Brunswick, and between the Ontario and New Brunswick commissioners.

- In Ontario, the Office of the French Language Services Commissioner was created in 2007 by an order in council. The Commissioner reported to the Minister Responsible for Francophone Affairs until the *French Language Services Amendment Act (French Language Services Commissioner), 2013* came into force; this Act allowed the Commissioner to report directly to the legislative assembly. A request for such an amendment had been presented in the Commissioner's 2011–2012 annual report.¹⁸
- In New Brunswick, the Office of the Commissioner of Official Languages was established by the 2002 *Official Languages Act*. In this province, the Commissioner is an officer of the legislative assembly and is independent of government.
- In the territories, the ombudsman positions have a longer history. Their responsibilities range from French and English to Aboriginal languages.
 - The Office of the Languages Commissioner of the Northwest Territories was created in 1990. The Commissioner is appointed by the legislative assembly and is independent of government.¹⁹
 - The Office of the Languages Commissioner of Nunavut was established when the territory was created in 1999. Here, as well, the Commissioner is an independent officer of the territory's legislative assembly. It should be noted that a separate office, the Inuit Uqausinginnik Taiguusiliuqtiit, has authority on services offered in the Inuit language.

Even though Prince Edward Island's legislation does not provide for the creation of an ombudsman office, it prescribes the appointment of a Complaints Officer accountable to the Minister Responsible for Acadian and Francophone Affairs. The complaints are first addressed by the French Language Services Co-ordinator of the government institution involved in the incident, and may be referred to the Complaints Officer when appropriate.

In Quebec, the role of the Office québécois de la langue française is distinctive, in that it promotes French as the language of the majority.

2.6 GOVERNMENT SERVICES OFFER

The majority of the provinces (seven out of 10) and all the territories have taken measures for government services offer in the minority language. However, the extent to which those services must be provided vary from place to place.

- Measures have been taken in Prince Edward Island, New Brunswick, Ontario, Manitoba, Saskatchewan, Yukon and Nunavut to provide for active offer of services.
- The concept of comparable quality of services offered is also part of the legislation in three cases: Prince Edward Island, Yukon and Nunavut.

- For both New Brunswick and Ontario, the requirement for services offered in the minority language includes third parties providing services on behalf of the provincial government.
- In three cases, government institutions are designated by regulations to offer services in the minority language: Prince Edward Island, Nova Scotia and the Northwest Territories.
- The concept of designated areas is used in Ontario²⁰ and Manitoba,²¹ while legislation in the three territories refers to the concepts of significant demand and nature of the office.
- In Saskatchewan, communications with the public and service delivery are provided in the two official languages where appropriate.
- In Nunavut, a separate Act provides for service delivery in the Inuit language.
- In Newfoundland and Labrador, the current policy calls upon the provincial government departments to utilize the services offered by the Office of French Services, including French language training for employees, translation services, and other linguistic support or community liaison services.

2.7 PARLIAMENTARY BUSINESS

The use of a minority language is permitted in the course of proceedings in nine legislative assemblies.

- In Quebec, Manitoba and New Brunswick, the obligations are entrenched in the Constitution.
- In the three territories,²² as well as in Ontario, Saskatchewan and Alberta, the provisions are under the jurisdictions' respective legislation. However, in the two latter instances, the use of French is allowed for debates only.²³

The use of minority language is also permitted for the printing and publication of Acts in eight cases:

- In Quebec, Manitoba and New Brunswick, the obligations are entrenched in the Constitution.
- In the three territories²⁴ and in Ontario, the provisions are under the jurisdictions' respective legislation.
- In Saskatchewan, the legislation provides that the province's Acts and regulations may be enacted, printed and published in English only or in English and French. No such provision exists in Alberta.²⁵

2.8 MINORITY-LANGUAGE COMMUNITIES

Some provincial and territorial Acts and policies contain provisions with regard to the development of official-language minority communities:

- The preamble of the Nunavut's *Official Languages Act* recognizes the heritage, cultural contribution and value of all three official language communities.

- In Saskatchewan, provisions have been made in the provincial policy for consultations with the francophone community. An advisory committee on francophone affairs helps to implement the policy. In June 2012, it recommended that the government and the community review the policy every three years.²⁶
- In New Brunswick, the equal status, rights and privileges of the French and English linguistic communities are recognized in an Act and guaranteed under the Constitution.
- In Prince Edward Island, the *French Language Services Act* broadly defines the Acadian and francophone community as including “people within the province who have a common knowledge and understanding of the French language.” An advisory committee has the mandate to provide advice to the Minister on any matters concerning this community.
- In Nova Scotia, the development of the Acadian and francophone community is encouraged in the Act. The Minister of Communities, Culture and Heritage ensures that the government, departments and agencies consider the needs of this community when developing policies, programs and services.

3 INTERGOVERNMENTAL COOPERATION

3.1 FEDERAL–PROVINCIAL COOPERATION

Beginning in the mid-1990s, the federal government signed cooperative agreements to promote French-language services in the provinces and territories.²⁷ The goal of these agreements was to increase the capacity of the provincial and territorial governments to develop, improve and provide services, including municipal services, in the language of the minority population.

The funds allocated enable the implementation of initiatives such as the *Official Languages Act* in New Brunswick and the *French-language Services Act* in Nova Scotia. They are also used to promote the delivery of services in all areas (other than education) deemed essential to the development of official-language communities in a minority setting (e.g., justice, health, youth and the arts). Each province and territory establishes a strategic plan describing planned actions and expected results.

All provincial and territorial governments have set up offices responsible for francophone affairs. Most of the time, those offices are under the responsibility of the minister responsible for francophone affairs; in some cases, they come under another ministerial portfolio (e.g., a provincial secretariat or intergovernmental affairs). It is interesting to note that the management of affairs connected with the English-speaking population in Quebec does not come under a particular ministerial portfolio.²⁸

In the *Roadmap for Canada’s Linguistic Duality*, released in June 2008, the federal departments had pledged to “extend and enhance service delivery in both official languages in the provinces and territories.”²⁹ In the *Roadmap for Canada’s Official*

Languages released in March 2013, the Government of Canada restated its desire to work with other orders of government to strengthen Canada's linguistic duality.³⁰

3.2 INTERPROVINCIAL COOPERATION

Since the late 1980s, the Government of Quebec has signed cooperative agreements with the governments of other provinces and territories in order to improve the provision of services in French.³¹ The prioritized sectors include culture, communications, education, economic development and health. Help is also provided in other sectors, such as early childhood education, youth, immigration, justice, sustainable development and information technologies.

The *Politique du Québec en matière de francophonie canadienne*³² was updated in 2006. When the new policy was announced, the Quebec Secrétariat aux affaires intergouvernementales canadiennes explained the rationale behind it in this way:

The policy became necessary to better convey the Quebec government's desire to resume its leadership role within the Canadian federation and fully assume its historical and specific responsibility to Francophones in all regions of Canada. It was also important to reinforce solidarity between Francophones in Quebec and Francophones elsewhere in Canada, and strengthen our position in light of the risks and opportunities created by globalization for the future of the French language. Finally, it was necessary to consider changes concerning equity with regard to language rights in Canada.³³

In concrete terms, this commitment has involved activities such as the creation of the *Comité interministériel québécois sur la francophonie canadienne*, the management of financial support programs, the introduction of a Canadian Francophonie Day in Quebec and the implementation of the *Centre de la francophonie des Amériques*. Other activities will take place by 2017 to strengthen ties between francophones in Quebec and those across Canada, as set out in the action plan released by the Quebec government in May 2012.³⁴

3.3 NATIONAL COOPERATION MECHANISMS

Since 1994, the provinces and territories have participated annually in the Ministerial Conference on the Canadian Francophonie.³⁵ This body is committed to strengthening intergovernmental cooperation on issues relating to francophone affairs in Canada. It also works to improve the coordination of provincial and territorial actions with those of the federal government. Each province and territory is represented at the conferences by a minister responsible for francophone affairs. The federal government has been represented since 2005. In a consultation report published in 2006, the Canadian Francophonie leaders said that they were relying on the conference to:

- [c]ontribute to the articulation of a mobilizing vision statement and directions that would garner the support of the entire Canadian Francophonie;
- [a]ctively promote the Canadian Francophonie and communicate its current and future relevance at high-media events;

- [e]xercise leadership in matters of youth and immigration, through large-scale, concrete projects with multiple spinoff effects.³⁶

At their most recent annual meetings, provincial and territorial ministers examined various issues, including francophone immigration, CBC/Radio-Canada funding, the provision of services in French, and early childhood and economic development.

3.4 INTERNATIONAL COOPERATION MECHANISMS

Two provincial governments (Quebec and New Brunswick) have the status of participating governments at the *Organisation internationale de la Francophonie*. Their participation gives the two provinces the political leverage to influence a number of international issues related to the Francophonie. The other provinces and territories are represented by the federal government, which has the status of Member State.³⁷

Some Quebec municipalities and the *Association francophone des Municipalités du Nouveau-Brunswick* sit on the *Association Internationale des Maires Francophones*, an international network of locally elected representatives from countries where the place of French is formally recognized. Furthermore, the Francophone and Francophile Cities Network, created in 2015, brings together close to 100 municipalities across Canada, the United States and the Caribbean that wish to contribute to the promotion of America's francophone communities.³⁸

NOTES

1. [Devine v. Quebec \(Attorney General\)](#), [1988] 2 S.C.R. 790.
2. See Daniel Bourgeois et al., [Provincial and Territorial Government Contributions to the Development of Francophone Minority Communities: Assessment and Projections](#), Prepared for the Ministerial Conference on the Canadian Francophonie, Moncton, July 2007; Ministerial Conference on the Canadian Francophonie, [The Canadian Francophonie: An Overview of Government Initiatives](#), September 2008; Ministerial Conference on the Canadian Francophonie, [Newsletter – Special Edition](#), 2015; and Office of the Commissioner of Official Languages, [Official languages in the provinces and territories](#).
3. The New Brunswick *Official Languages Act*, as amended in 2002, provided for a review of this Act before 31 December 2012. After two years of work and consultation, the provincial government tabled a bill on 14 June 2013 to amend the *Official Languages Act*. *An Act Respecting Official Languages* was enacted one week later. See Government of New Brunswick, Office of the Premier, "[Provincial government proposes amendments to Official Languages Act](#)," News release, 14 June 2013.

On 8 May 2013, the government of Prince Edward Island passed a new *French Services Act*. Its proclamation on 14 December 2013 repealed the previous statute passed in 1988. See Office of the Premier of Prince Edward Island, "[French Language Services Act proclaimed on December 14](#)," News release, 12 December 2013.
4. See Government of Newfoundland and Labrador, "[Office of French Services](#)," *Human Resource Secretariat*.

5. With respect to Alberta and Saskatchewan, the Supreme Court of Canada examined the legality of language provisions in force in Alberta and rendered a split decision in November 2015 saying that the province was not required to enact its laws in both English and French. For details on this case, see [Caron v. Alberta](#), 2015 SCC 56 [*Caron*]. See also Office of the Commissioner of Official Languages, [Language Rights 2009–2011](#), particularly section 2.1, “Legislative and judicial bilingualism in Alberta”; and Marie-Ève Hudon, “[Language Rights of Francophones in Western Canada to Be Heard by the Supreme Court ... Today](#),” *HillNotes*, Library of Parliament, 13 February 2015.
6. In November 2015, Manitoba Premier Greg Selinger tabled Bill 6: The Francophone Community Enhancement and Support Act. See Government of Manitoba, “[Manitoba Government introduces proposed legislation that would support francophone community](#),” News release, 24 November 2015.
7. In New Brunswick, the next review of the *Official Languages Act* should take place no later than 31 December 2021.
8. The Northwest Territories’ *Official Languages Act* provides for a review of the Act after five years. The Standing Committee on Government Operations tabled the findings of its first review in May 2009, followed in March 2015 by the findings of its second review. In its most recent report, the committee expressed concerns about the lack of follow-up and transparency from the territorial government with regard to review of the Act. See Northwest Territories, Standing Committee on Government Operations, *Report on the 2014 Review of the Official Languages Act*, 17th Legislative Assembly, 11 March 2015.
9. In Nunavut, the *Official Languages Act* sets out a five-year term review conducted either by the legislative assembly or one of its committees.
10. Educational measures, commonly referred to as “Education Act” or “School Act,” were adopted by each province and territory in the 1990s.
11. See Canadian Heritage, “[Federal-Provincial-Territorial Agreements in Education](#),” *Education*. Agreements have been signed with all provinces and territories for the period 2013–2014 to 2017–2018, but these have not been posted on Canadian Heritage’s website.
12. Section 8(1) of the *Inuit Language Protection Act* states:

Every parent whose child is enrolled in the education program in Nunavut, including a child for whom an individual student support plan exists or is being developed, has the right to have his or her child receive Inuit Language instruction.
13. [Criminal Code](#), R.S.C., 1985, c. C-46.
14. In Saskatchewan and Alberta, the right to use French or English is recognized before certain courts only. This right is restricted by the fact that individuals have no guarantee that they will be understood or that the statutes of the two provinces will be available in French. In Alberta, unlike in Saskatchewan, a regulation defines the use of French in court proceedings.
15. A Supreme Court ruling in the summer of 2013 upheld an 18th-century statute requiring that English be used in the province’s courts. In a split decision (4 to 3) the Court ruled that constitutional rights did not apply to the tendering of documents and that it was the responsibility of the British Columbia government to pass a legislative or policy framework allowing French to be used before the provincial courts. See [Conseil scolaire francophone de la Colombie-Britannique v. British Columbia](#), 2013 SCC 42.
16. Prince Edward Island’s new [French Language Services Act](#) does not directly address the issue of French services in the province’s courts. However, the Act makes clear that the legislative intent was not to restrict the use of French in cases not covered by the Act.

17. In Ontario, the *French Language Services Act* allows for, but does not impose, the passing of by-laws providing that the administration of a municipality shall be conducted in both English and French. Some municipalities in that province have adopted such regulatory measures.
18. Ontario, Office of the French Language Services Commissioner, [2011–2012 Annual Report: Straight Forward](#), 2012, p. 4.
19. The Northwest Territories Commissioner's office has been more or less active in recent months. The [Northwest Territories Language Commissioner's website](#) is no longer available in French and Aboriginal languages. The complaints procedure has experienced delays (See Alyssa Mosher, "[N.W.T. language complaints backlogged for 10 months](#)," *CBC News – North*, 26 September 2014). The Commissioner in office resigned in spring 2015 (See "[Snookie Catholique resigns as N.W.T. languages commissioner](#)," *CBCNews – North*, 13 March 2015). The position was filled in October 2015, but the choice does not have unanimous agreement (See "[N.W.T.'s languages commissioner should be aboriginal, says educator](#)," *CBCNews – North*, 22 October 2015).
20. In Ontario, services in French are provided in 26 designated areas where the concentration of francophones is at least 10% or represents at least 5,000 people. The agencies required to provide services in French are designated by regulation.
21. In Manitoba, services in French are provided in a number of designated areas where the French-speaking population is concentrated. French-language services are actively offered by fully or partially bilingual service centres.
22. Existing Acts in the three territories allow for the use of English, French or an Aboriginal language in the debates and other proceedings of the legislative assembly.
23. In Alberta and Saskatchewan, all documents of the legislative assembly are made, printed and published in English only.
24. In the three territories, Acts are made, printed and published in English and French, and both versions are equally authoritative.
25. The recent Supreme Court decision in *Caron* provides for the status quo.
26. Saskatchewan, Advisory Committee on Francophone Affairs, [Report of the Advisory Committee on Francophone Affairs To the Government of Saskatchewan: Government of Saskatchewan French-language Services Policy](#), June 2012. In August 2015, the advisory committee stated new recommendations with regard to the implementation of the provincial policy. See Saskatchewan, Advisory Committee on Francophone Affairs, [Report of the Advisory Committee on Francophone Affairs To the Government of Saskatchewan: Government of Saskatchewan French-language Services Policy](#), August 2015.
27. The first cooperation agreement was concluded in 1984 between the Government of Canada and the Government of the Northwest Territories. Other agreements were signed at the end of the 1980s, and such agreements became standard by the middle of the 1990s.
28. In September 2012, the Government of Quebec for the first time gave one of its ministers the mandate to connect with the English-speaking community, asking him to act as a designated contact person. This practice has not been renewed since then. See Guillaume Bourgault-Côté, "[Pas de privilèges pour les anglophones](#)," *Le Devoir*, 19 April 2014 [Available in French only]; and "[Québec doit faire plus pour la minorité anglophone, selon Graham Fraser](#)," *IciRadio-Canada.ca*, 18 January 2015 [Available in French only].
29. Canadian Heritage, [Roadmap for Canada's Linguistic Duality 2008–2013: Acting for the Future](#).

30. Canadian Heritage, [Roadmap for Canada's Official Languages 2013–2018: Education, Immigration, Communities](#).
31. The first interprovincial agreement for cooperation and trading was concluded in June 1969 between the Government of Ontario and the Government of Quebec. This agreement still exists and has been updated since then. See Government of Quebec, Secrétariat aux affaires intergouvernementales canadiennes, [Coopération intergouvernementale](#) [Available in French only].
32. Government of Quebec, Secrétariat aux affaires intergouvernementales canadiennes, [L'avenir en français : Politique du Québec en matière de francophonie canadienne](#), 2006 [Available in French only].
33. Government of Quebec, Secrétariat aux affaires intergouvernementales canadiennes, "Nouvelle Politique du Québec en matière de francophonie canadienne: Le Québec s'engage auprès des francophones du Canada," News release, 7 November 2006 [Translation].
34. Government of Quebec, Secrétariat aux affaires intergouvernementales canadiennes, [La francophonie @ cœur : Politique du Québec en matière de francophonie canadienne – Actions à l'appui](#), 2nd ed., 2012 [Available in French only].
35. See the [Ministerial Conference on the Canadian Francophonie website](#).
36. Ministerial Conference on the Canadian Francophonie, [Canadian Francophonie: Issues, Challenges and Future Directions](#), October 2006, p. iv.
37. Ontario would like to obtain the same status as its Quebec and New Brunswick counterparts. See Philippe Orfali, "[L'Ontario veut adhérer à l'OIF, mais Ottawa lui bloque la voie](#)," *Le Devoir*, 21 July 2015; and Jean-François Dugas, "[OIF : l'Ontario reçoit l'appui du Québec](#)," *Le Droit*, 25 September 2015.
38. See the [Réseau des villes francophones et francophiles d'Amérique](#). The City of Ottawa also joined the network in early 2016. See "[Ottawa rejoint le Réseau des Villes francophones et francophiles de l'Amérique](#)" *IciRadio-Canada.ca*, 6 January 2016 [Available in French only].

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