Introduction
The Evangelical Fellowship of Canada (EFC) recognizes that the government, in wanting to make “sexual orientation” a part of the federal Human Rights Act, is attempting to deal with what it believes to be inequalities experienced by the homosexual community.

We would ask the government to be forthright in saying exactly what those inequalities are and to devise appropriate and specific legal arrangements that would address those issues without opening the door to a wholesale re-orientation of Canadian law and values.

However, to place “sexual orientation” within the Human Rights Act puts the government in a place where it is called to legislate and legitimize a particular conviction concerning sexual orientation. It’s our view that the government has no right to engage in such legislation of morals.

The Evangelical Fellowship of Canada then views the addition of “sexual orientation” to the Human Rights Act as unnecessary:

• First, it isn’t necessary for the protection of human rights, including the rights of homosexuals.
• Second, it has the effect of making government more intrusive than is justifiable in a free and democratic society.

Background
On April 17, 1982, the Charter of Rights and Freedoms was proclaimed as part of the Constitution of Canada. Implementation of section 15 of the Charter – which deals with the issues of equality – was delayed by three years to allow the federal and provincial governments to bring their legislation into line with the new Charter.

To conduct the study, the federal government established a Parliamentary Committee on Equality Rights chaired by MP Patrick Boyer. The committee’s report, Equality for All, made 85 recommendations in its submission of October 25, 1985.

Among these it recommended that the Canadian Human Rights Act be amended to add “sexual orientation” as a prohibited ground of discrimination. The government on March 4, 1986, in its response, Toward Equality, agreed with the committee and indicated its intent to amend the Human Rights Act accordingly.

Special Note
The federal Human Rights Act covers only areas of federal authority; that is, only those groups which come under direct federal jurisdiction. But an amendment that would include “sexual orientation” in the Canadian Human Rights Act would signal a fundamental departure in public policy and would have local and provincial ramifications. Consequently, the comments that follow are applicable to rights legislation in a general sense, be it provincial or federal.

What’s at Stake
At stake is not whether homosexuals should have the same rights as everyone else in Canada. On that we have a fundamental agreement that they should. This issue is that by including “sexual orientation” in the Canadian Human Rights Act the rights and freedoms of many individuals and groups will be threatened and the intent of the government, to provide and protect human rights, will be distorted.

For example, a volunteer agency could lose its right to define its code of conduct. The Big Brothers Association in Minneapolis is a prime example. A sexual orientation ordinance was enacted there during the seventies. In 1977, a young man applied to become a Big Brother – that is, a role model for a fatherless boy. Big Brothers noticed that his resumé mentioned homosexual affiliations; when asked, the applicant admitted to being homosexual. The interviewer explained that the mother of the boy with whom the adult
would be matched would be told of this, as well as other information on him and other applicants so she could decide on the suitability of the applicants.

The young man sued under the Minneapolis sexual orientation ordinance on the grounds of discrimination. Big Brothers countered by asserting that their policy was not discriminatory, because they gave full disclosure of relevant materials on applicants to the parents they directly involved.

The Human Rights Hearing Officer found Big Brothers guilty of discrimination. The group was required to accept the homosexual as a Big Brother without disclosure to the mother of the boy. In addition, “affirmation action” was required of Big Brothers: the organization was forced to advertise in two San Francisco newspapers, inviting homosexual partners to come to Minneapolis as Big Brothers to fatherless boys. Today the state policy in Minnesota for such cases is that the mother not be advised that the man is homosexual.

We also fear that private and religious schools could be forced to teach that homosexuality is a legitimate, normative and alternative lifestyle. And if such equal time was not provided, the school could jeopardize its right to function or be forced to defend itself in a court of law. If “sexual orientation” was made part of what a school system was forced by law to recognize, even if the religious view of that school opposed homosexuality, by law it could either be forced to violate its own beliefs or commit an “offence” and thus be indicted.

And what would happen with agencies such as group homes or social facilities who serve the public based on a religious commitment? Would they be compelled to disregard their convictions on sexual behaviour because their budget may, in part, be funded by government? Clearly, to insist that a religious social agency not entertain matters of religious belief in its hiring is to erode the very essence of that group. The law in effect would force that group to deny what it is.

The Salvation Army knows only too well what this type of legislation does to the free and open maintenance of a social program. The New York city council attempted to include with Salvation Army, Roman Catholic and Jewish agencies a clause pertaining to “sexual orientation.” The Salvation Army objected. After years of debate it was eventually solved, but at the high cost of disrupting community service and legal fees.

We are concerned about what the ultimate impact will be on marriage and adoption if this type of legislation is enacted, either federally or provincially. For if “sexual orientation” is added to human rights legislation, pressure will eventually be exerted on the courts to reinterpret the meaning of “marriage.” Not only would lesbian and homosexual marriages occur but there also could be a demand on government to provide family and health benefits to homosexual couples. This would result in the adoption of children in same-sex marriages.

**Our Specific Areas of Concern**

We are concerned:

1. that volunteer agencies dealing with children may not be free to set their own standards. In response to this, a provincial parliamentarian wrote, “Social agencies can continue to set standards for volunteers under the Code, as they do now.”

It’s true that at this moment a volunteer agency can set its own standards. But suppose it becomes illegal to “discriminate” against an admitted homosexual who applies as a volunteer in an agency. That agency could be seen as breaking the law if it refused to admit such a person on the basis of that individual’s not conforming to the sexual standards of the agency.

2. that homosexual relationships would be given the same legal recognition or benefits as marriage, such as family and welfare benefits. Governments considering sexual orientation legislation have given assurances that they will not allow the conferral of legitimacy to a homosexual marriage. We’re not satisfied with this for it appears the government has not really faced up to the issue. Ontario Premier David Peterson replied to Brian Stiller, EFC’s executive director:

> Regarding homosexual marriages, it is my understanding that “marital status” is defined in section 9(g) of the Code to include the status of being married. The definition of “marriage” that is contained in the Oxford English Dictionary is the “the condition of a man and woman legally united for the purpose of living together; the act or procedure or ceremony establishing this condition.”

> Furthermore, “spouse” is defined in section 9(j) of the Code as “the person to whom a person of the opposite sex is married…” These definitions indicate that the proposed inclusion of sexual orientation to “services” under Section 1 of the [Ontario Human Rights Code, 1981](https://www.ontario.ca/en/legislation/ontario-human-rights-code) would not enable a homosexual couple to receive the service of the solemnization of marriage.

With respect, we believe that EFC’s point has been missed. The Premier is describing the way things are now. But protecting citizens’ rights to a homosexual lifestyle would lay the groundwork for same-sex marriages; it will eventually be argued that to deny such “marriages” would be discriminatory.
Right now, as the human rights legislation does not forbid discrimination on the basis of sexual orientation, no court will find the statutes discriminatory. But under the proposed changes, the Marriage Law itself will be challenged as discriminatory and become legislatively vulnerable.

3. that the likelihood of a homosexual couple’s adopting would be substantially increased. Premier Peterson addressed these concerns by saying,

With respect to the right of homosexuals to adopt children, I should point out that adoption in Ontario is conducted under the provisions of the Child and Family Services Act, which stipulates that an adoption must be in the best interests of the child. Although many factors are taken into consideration in assessing whether a particular adoption would be in the best interests of the child, it is unlikely that a homosexual parent or parents would be deemed to be in the best interests of the child in most cases.4

Again, this reply begs the question. It is perfectly untrue that at the present time no court is likely to find that a child’s best interests would be served by being adopted by a homosexual couple. For at the present time no provincial Human Rights Code, apart from Quebec’s, forbids discrimination on the basis of sexual orientation. No one at the present time can claim that his or her human rights are violated by such finding of the courts. It is what happens after sexual orientation legislation is passed that is worrisome.

Furthermore, the Premier’s reference to “most cases” and his use of the word “unlikely” imply that exceptions are already envisioned.

Our concern is that such legislation will give rise to a trend in which the assumption will be made that it is discriminatory either to suppose or to act on the supposition that a homosexual atmosphere is undesirable for the raising of children.

In 1985 the Ontario Ministry of Community and Social Affairs issued a directive to all regional directors of children’s aid societies in Ontario. It took the position that adoption and foster care were included within the meaning of “services” in the Ontario Human Rights Code. If that policy is correct, and sexual orientation is inserted into the provincial Human Rights Code, it would become illegal for Children’s Aid Societies and other agencies to deny homosexuals the right to adopt children or to act as foster parents, even if such adoptions or placements are not considered to be in the best interests of the child.5

4. that the government has not clarified what is meant by “sexual orientation.” Although most would assume it refers to homosexuality and lesbianism, nothing indicating that has been stated.

The sponsors of this legislation thus fail to define what “sexual orientation” means. The result is that the proposed legislation almost certainly will have the unintended effect of creating protection for other orientations such as sexual abuse of children or animals, or other sexual aberrations.

In Quebec the Human Rights Commission has interpreted sexual orientation to include “all tendencies or directions taken by one’s sexuality, including the behaviour generated by the tendency.”

“Consequently, heterosexuality, homosexuality, bisexuality and transsexuality are all covered by the expression.”

The Coalition for Gay Rights in Ontario urged the provincial government to define sexual orientation “Including, but not limited to, heterosexuality, homosexuality and bisexuality.”

We ask, what then does sexual orientation mean? Until there is a forthright definition, the possible protection this proposed legislation would offer to a variety of sexual orientations is beyond belief.

5. that small businesses or people who wish to rent out a part of their dwelling could be forced to defend their rights when refusing to rent to homosexuals.

Consider the following: Mrs. Murphy, who wishes to rent out room in her house, could lose the right to say “No” even if she has young children in the house and doesn’t wish her children to be affected by the influence of such homosexual activity.

6. that public and private school systems will be pressured to teach that the homosexual lifestyle is a viable and normal alternative to traditional marriage and family life. It is not unrealistic to expect, if sexual orientation legislation is passed, that a school refusing to condone other sexual orientations would be considered discriminatory by the courts. Almost certainly, schools would be pressured to teach in such a way as to imply that homosexual activity is equal to and just as desirable as marriage and family life. As well, we are concerned that the proposed legislation would jeopardize the right of Christian school systems to require that all staff at all levels maintain Christian lifestyles.

7. that Christian churches and other religious groups may not be free to teach their biblical doctrines of sexuality and that such teaching would be interpreted as being an attack on homosexuals.
In short, we see that adding sexual orientation to human rights legislation changes the purpose of the Charter. At present, laws protect morally neutral characteristics such as race or sex.

The proposed change – the addition of sexual orientation as a protected status – will serve to protect a particular lifestyle. In essence, what now serves to provide an environment of fair play for all Canadians gets caught up in the dubious task of requiring support for a particular lifestyle.

The Legal Background

The Charter of Rights and Freedoms, proclaimed on April 17, 1982, is part of the Constitution of Canada. Today, the Charter can be changed only by a complicated amending formula. Most observers see amendments to the Charter as quite unlikely. The courts are now being asked to rule on how the Charter should be interpreted. Courts can also strike down legislation which they see as inconsistent with the Charter.

For that reason the government delayed implementation of section 15 of the Charter for three years to give governments time to amend any laws that might not survive court challenges. Given that it is the stated intent of the federal and some provincial governments to include “sexual orientation” in the federal Human Rights Act and provincial codes, the question to consider is: Is there anything in the Charter that would cause the courts to find that discrimination on the basis of sexual orientation is contrary to the Charter? In our view, that’s a question for the courts to decide. It’s not a matter for legislation. For if it doesn’t violate the Constitution, then you don’t need a new law. If it does violate the Constitution, the courts will so inform the government.

Section 15

Here is where a more thorough discussion of section 15 of the Charter is very important.

Subsection 1 states: “Every individual is equal before and under the law and has the right to the equal protection and equal benefit of the law without discrimination based upon race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.”

You’ll note that sexual orientation is not mentioned. How then did it become an issue in connection with the Charter?

Sexual orientation became an issue at the federal level when the House of Commons formed a Parliamentary Committee on Equality Rights chaired by PC Patrick Boyer (1985) to provide the public with an opportunity to discuss the implications of section 15. Many Canadians who would have had a strong opinion on some of the issues raised did not realize what was happening.

Among the recommendations made by the Parliamentary Committee was a proposal that the Canadian Human Rights Act be amended to add “sexual orientation” as a prohibited ground of discrimination.

The federal government, in its response to the Boyer committee, indicated its willingness to amend the Canadian Human Rights Act by adding “sexual orientation” as a prohibited ground of discrimination. (The Canadian Human Rights Act must clearly be distinguished from the Charter of Rights and Freedoms. The Charter is part of the Constitution, but the Canadian Human Rights Act is legislation that is passed by Parliament. The Act can be amended by Parliament on its own authority by a simple vote in the House of Commons, but the Charter is beyond the reach of Parliament alone.)

The response to the recommendations on sexual orientation was, “The government recognizes that the issue of sexual orientation addresses some of the most difficult moral and religious concerns of Canadians.”

This statement does not explain why, in that case, the issue was raised, or why these “most difficult” concerns were not addressed at all! What, after all, does the federal government think the concerns are? It is fine for the government to observe that these concerns are indeed difficult. But is their response to be a mere passing acknowledgement of these unidentified concerns? Or does it have some other concerns in mind, raised perhaps by other groups? Will it address these difficulties, or ignore them, or trample over them?

The government went on to say, “Though fully cognizant of the social dilemmas that the issue raises, the Government is committed to the principle that all Canadians have an equal opportunity to participate as fully as they can in our society; no one should be denied opportunities for reasons which are arbitrary or irrelevant.”

We couldn’t agree more. No one should be denied equal opportunities for reasons that are arbitrary or irrelevant – that’s the point of establishing human rights legislation. But nothing so fundamental as human sexuality should be considered irrelevant. And the widespread disapproval of certain sexual lifestyles, regarded by many as sexual disorientation, should not be automatically labelled “arbitrary.” If the issues really are difficult, then it is patronizing double talk to label a position as “arbitrary.”
To judge that religious convictions are arbitrary or irrelevant is to misunderstand the very nature of religious faith. It seems the writers of this legislation think that by the stroke of a pen, differences that come out of deeply held beliefs can be discounted. Indeed, it is our common goal to find equality for all. But the question remains, by whose standards?

Is it in the Charter?

In order to explain its decision to add “sexual orientation” to the Canadian Human Rights Act, the federal government has expressed the opinion that “the courts will find that sexual orientation is encompassed by the guarantees in section 15 of the Charter.” How valid is this opinion?

The word “sex”, as used in section 15 of the Charter, cannot be defined so as to include “sexual orientation.” “Sex” in the Charter of Rights and Freedoms refers only to gender, not to any sexual preference or activity. A Canadian court case makes this abundantly clear. The Board of Governors of the University of Saskatchewan was sued by a gay liberation activist. The graduate student, who also was a sessional lecturer at the College of Education, was a member of the Gay Liberation Movement and promoter of the Academic Gay Association. The University decided not to allow him to continue to supervise the practice teaching being done by students of the college in public schools in Regina. He complained to the Saskatchewan Human Rights Commission of discrimination on the basis of a bias against his sexual orientation.

Mr. Justice Johnson found that the Saskatchewan Human Rights Commission lacked jurisdiction to proceed with the case because “the section in question prohibits discrimination on the basis of his race, his religion, his sex, etc., and not on the basis of his sexual activities, his sexual propensity or his sexual orientation.” He further observed, “If the legislature had intended the word ‘sex’ as it appears in s.3 of the Fair Employment Practices Act to cover homosexuality or lesbianism, it ought to have said so in express language, and its failure to do so confirms my view that it did not so intend.” It is likely that most courts would come to the same conclusion, determining that “sex” in such legislation means “gender” and not “sexual lifestyles.” In our view, the legal precedent has been set.

Those who argue for including sexual orientation in the federal Human Rights Act or a provincial Human Rights Code do so because they interpret the words “and, in particular” in section 15 as meaning the right to special protection for a homosexual lifestyle already exists in the Charter. Thus, the argument goes, protection for the homosexual lifestyle is assumed and should be enshrined in the Canadian Human Rights Act. But this argument surely invites a question such as, “Should we not also, within the Human Rights Act, identify and give special protection to those who are obese?” If the Charter protects obese people from discrimination, which we believe it does, then should they not also be given mention in the Act? Of course not. That’s why the Charter exists.

It is sufficiently general to include all without forcing the federal Human Rights Act or a provincial Human Rights Code to single out any group, be they obese or homosexual.

Should we amend our laws to include all possible forms of discrimination not mentioned in section 15 on the grounds that they are (or might be) included in section 15? That would be absurd. In any case, even if sexual orientation is seen by the courts as to be included in the Charter, then this is something for them to decide.

What did the writers of the Charter intend?

A starting question the courts will ask in determining what the legislation means is: What did the framers of the Charter actually intend it to mean? Since the legislation is of recent composition, it’s relatively easy to discover what they intended.

It is evident that the Special Joint Committee of the Senate and the House of Commons did not intend to include “sexual orientation” in section 15(1). On January 29, 1981, MP Svend Robinson’s motion to include “sexual orientation” was defeated by a vote of 22 to 2. Later the House of Commons, on June 19, 1981 and again on May 11, 1983, turned down similar amendments to the Human Rights Act.

Alistair MacBain, Parliamentary Secretary of Justice, told the House:

Let us now consider sexual orientation in the context of the Canadian Human Rights Act. When the House considered the Act in 1977, the question of adding sexual orientation to the list of prohibited grounds of discrimination was raised before the Standing Committee on Justice and Legal Affairs. The Committee rejected the amendment at that time. I would consider it obvious it was not the intention of Parliament at that time to prohibit discrimination on the basis of sexual orientation … For the most part, it was decided that the negative implications outweighed its advantages …

It seems it would be difficult for the courts to rule that “sexual orientation” was the intention of the legislators, who have made their views abundantly clear by these votes in the House of Commons.
**Pluralism**

We fully understand that our society is pluralistic: A society in which a plurality of competing views of morality informs the conscience of the culture. We agree that it is not appropriate for a religious belief, even though shared by a substantial number of religious people, to be imposed on others. However, what we do object to is the government showing such insensitivity to the bona fide religious and moral convictions of a substantial community in this country.

Further, pluralism not only allows people to think as they like but it provides freedom for people to act according to their beliefs and to do so in association with others, given that those actions do not violate the legitimate rights of others. Section 27 of the Charter makes it clear: “This Charter shall be interpreted in a manner consistent with the preservation and enhancement of the multicultural heritage of Canadians.” Judge Rosalie Silberman Abella, speaking on equality, said:

> Sometimes equality means treating people the same way, despite their differences, and sometimes it means treating them as equals by accommodating their differences. Formerly, we thought that equality meant sameness and that treating persons as equals meant treating everyone the same. We now know that to treat everyone the same way may be to offend the notion of equality. Ignoring differences may mean ignoring legitimate needs … Ignoring differences and refusing to accommodate them is a denial of equal access and opportunity. It is discrimination …

Our concern is that what many religious communities and other Canadian groups would consider to be relevant and legitimate, the government would consider to be irrelevant and arbitrary. And if the government identifies one’s convictions on sexuality as being arbitrary, then it is its responsibility to state why.

Moreover, the EFC believes that the federal government is unaware of the social dilemmas it is blundering into by trying to add “sexual orientation” to the Canadian Human Rights Act.

**The Balance of Freedom and Equality**

It’s vital to point out that legal attempts to underwrite and promote equality will result at times in some loss of freedom. In some cases this is mandated by overriding public interest. Take, for example, laws that prohibit racial discrimination in a multicultural society such as ours. The establishment of quotas to ensure racial minorities admission into medical schools may well circumscribe the freedom of racial majorities. It is important to realize that in a free and democratic society, a very serious threat must be perceived before people’s freedom of association is infringed. There is a very real danger that sexual orientation legislation, in protecting a particular lifestyle, will create an ever-expanding list of specially protected groups, thus curbing the legitimate freedoms of the rest of society.

**Sailing Into Uncharted Waters**

An important question is: Do we know where this legislation is leading us?

The legislators who are attempting to push the legislation through often appear not to know what will happen when it is passed. Peterson’s response is such an example: “Since the provision regarding sexual orientation would be a new one, such a provision has never been tested by a Board of Inquiry or court in Ontario. It is therefore not possible to respond to your questions in any conclusive or definitive way.”

However, Ontario MPP Evelyn Gigantes, sponsor of Bill 7, appears to know. She wrote in a recent letter: “Sexual orientation has a very concrete legal meaning. Without citing cases in a detailed fashion, I can indicate that it means the difference between homo- and hetero-sexuality.”

Readers will find it instructive to compare Gigantes’ assurances with Peterson’s response. Doubtless, in her mind, Gigantes understands what she means, but the courts will have to decide what her legislation means, if it passes.

**What does it mean?**

An unanswered question is what is really meant by “sexual orientation”? Psychiatric literature on adults describes various sexual orientations including tendencies towards animals, small children, inanimate objects, and even corpses. Just because most people would assume these behaviours to be aberrant and wrong does not mean that they are not sexual orientations. And given that there is no definition of sexual orientation in the legislation, what would eventually be permitted under such a rubric?

The government could make it clear that for legal purposes “sexual orientation” will mean only what Evelyn Gigantes had in mind. The fact that it hadn’t occurred to anyone to make such a distinction much earlier in the discussion is disquieting. It strengthens the impression that the legislators do not know where this legislation is taking society.

It is our view that the concept of a human rights act or code is being changed by the introduction of sexual orientation. Previously, these acts or codes sought to protect people from discrimination based on unchangeable, morally neutral
characteristics such as race, colour, nationality or sex. If such legislation is enacted, with the purpose of protecting people who practice a particular lifestyle or engage in certain sexual practices, legislation will become much more intrusive in the lives of people and organizations.

**Is Such Legislation Necessary?**

A crucial question is: Is it necessary to add “sexual orientation” to the federal act or a provincial code in order to protect the rights of homosexuals?

Homosexual activity between consenting adults is not a criminal offence in Canada. Homosexuals have the same legal and constitutional rights as do all Canadians. They are protected by the *Charter of Rights* and existing human rights codes and enjoy the same equal protection and benefit of all statutory and common law rights and remedies.

For example, a homosexual man who is dismissed from his job for no other reason than that his employer discovers that he is a homosexual can sue for wrongful dismissal. He can sue for damages in the same courts and in the same manner as anyone else who is wrongfully dismissed. If he is covered by a collective agreement, he can file a grievance through the union. If it’s determined that he was wrongfully dismissed, he can be reinstated.

But those who wish to add “sexual orientation” to the human rights code refuse the term “equal rights.” Instead they ask that homosexuals receive special status as a specially protected group.

Homosexuals are already protected both by the *Canadian Human Rights Act* and provincial Human Rights Codes. What they want is special recognition of their lifestyle and sexual preference.

Already, when a case of complaint is brought before the Human Rights Commission, the accused person is called on to prove that his or she is innocent of discrimination. The onus on that person to prove innocence would be even heavier if human rights legislation provided special protection to a particular lifestyle.

**Conclusions**

The Evangelical Fellowship of Canada affirms the rights of all Canadians, including homosexuals, to share equally in the privileges of a free and democratic society.

We uphold the view that the Scriptures teach that homosexual practice is unacceptable. At the same time, we call on Christians to affirm justice and equality to all people.

We oppose the addition of the words “sexual orientation” to the federal *Human Rights Act* or to a provincial Human Rights Code. For the creation of a special category, protecting a particular lifestyle, changes the purpose of the Act or a code.

**Such an amendment:**

- Ends up making legislation more intrusive than is necessary, and than is intended.
- Has the potential of “criminalizing” the behaviour of ordinary people who are applying the ordinary standards of prudence and moral judgment.
- May support attempts to force through the legal system changes in the definitions of such fundamentals as marriage and adoption, changes that most citizens would disapprove of but would be powerless to erase.

If this kind of legislation were to be passed as a “human rights” measure, it would be difficult indeed to recall. We therefore call on the governments concerned to withdraw this legislation and, if necessary, to work through their own considerable existing resources to combat victimization of homosexuals and other citizens.

For further reading see,


The Evangelical Fellowship of Canada is a national association of 22 evangelical denominations, churches, mission agencies, educational institutions and individuals across Canada. The EFC serves its membership by representing concerns to national government, debating in public media, publishing reports, briefs and the news/feature magazine Faith Today, as well as giving leadership in special projects. The national office is located in the Toronto area. It is estimated that there are two million evangelicals in Canada.
Endnotes
2 M.P.P. Evelyn Gigantes, who sponsored Ontario’s Bill Seven, indicated in a letter, July 18, 1986, to Pastor William B. Lippman of the Fifth Avenue Free Methodist Church in Ottawa.
3 July 18, 1986
4 Ibid.
5 Directive 1-85, Ontario’s Community and Social Affairs Signed by A.F. Daniels.
8 Ibid., p.13.
9 Ibid., p.13.
10 1976, 66 D.L.R. (3rd.) 561 Q.B.
11 Commons Debates, 32nd Parl., 1st Sess., p.25372
13 July 18, 1986
14 Gigantes, Ibid.