



Brief

A Provincial Police Service that Responds to the Rights, Safety, and Needs of Alberta's Francophonie

submitted to the Ministry of Justice and Solicitor General

March 30, 2022

Introduction

1) The *Association canadienne-française de l'Alberta* ("ACFA") is submitting a brief to the Government of Alberta's Ministry of Justice and Solicitor General as part of its community stakeholder engagement following the Alberta Provincial Police Service Transition Study by PricewaterhouseCoopers' ("PwC"). The ACFA would like to bring forward specific considerations for Alberta's Francophonie. It should be noted that Alberta's Francophonie is an official language community in Canada.

1) The ACFA was founded in 1926 and is the spokesperson organization for Alberta's Francophonie. The Government of Alberta passed legislation in 1964 to incorporate the ACFA. Its incorporating act gave it the following mission:

(a) conserver les souvenirs des premiers habitants, missionnaires, commerçants de fourrures, explorateurs et colons d'origine française de l'Alberta ;
(b) promouvoir le bien-être intellectuel, moral, social et matériel des Canadiens d'origine française en Alberta ;
(c) promouvoir l'étude de la langue française et la formation de groupes d'éducation des adultes ;
(d) parrainer des programmes radiophoniques en français ;
(e) promouvoir la bonne volonté, l'harmonie et la coopération entre ses membres ;

(a) to rescue from oblivion the memories of the early inhabitants, missionaries, fur traders, explorers and settlers in Alberta of French origin
(b) to promote the intellectual, moral, social and material welfare of the Canadians of French origin in Alberta,
(c) to promote the study of the French language and the formation of adult education groups,
(d) to sponsor radio programmes in French,
(e) to promote goodwill, harmony and cooperation among its members,

(f) promouvoir une meilleure compréhension parmi les Canadiens d'origines raciales différentes dans la province. [Traduction officielle]

(f) to promote better understanding among Canadians of different racial origin in the Province¹.

- 2) The ACFA rallies key stakeholders to protect the accomplishments of Alberta's francophone communities, as well as to improve their rights and enhance their vitality. The ACFA played a central role in major cases on the status of French: *Mercure*², *Mahé*³, and *Caron*⁴. Its mandate is to represent Alberta's francophones; promote their physical, intellectual, economic, cultural, and social well-being; and encourage, facilitate, and promote French-language learning and Alberta's Francophonie at large. In addition, the ACFA promotes the inclusion of French speakers of all origins in Alberta within a diverse francophone environment.
- 2) To produce this brief, the ACFA relies on the community stakeholder engagement session that took place on January 5, 2022, between the ministry and Alberta's Francophonie stakeholders regarding the transition to a provincial police service, as a follow-up to PwC's final report. In addition, the ACFA, in partnership with *Alliance Jeunesse-Famille de l'Alberta Society*, had also presented to the ministry on May 5, 2021, a follow-up note to a stakeholder engagement session for the Police Act Review; some considerations and recommendations presented in that note are included in this brief.
- 3) In this brief, the ACFA presents the following:
 - a) The **status of French in Alberta** by providing a demographic portrait of Alberta's French-speaking population and by highlighting two pieces of legislation that provide a framework for language status in the province;
 - b) A portrait of the **current state of French-language police services** in Alberta;
 - c) **Ontario's case** to illustrate the provision of French-language services within another provincial police service;
 - d) **Elements to consider** to understand the specific needs of members of the French-speaking community, including issues raised during the engagement session held on January 5, 2022, and **recommendations** to ensure that resources that meet the real needs of the French-speaking community are accessible, that they are of comparable quality to those available in English, and that they ensure the continued delivery of currently available French-language police services.

¹ An Act to Incorporate l'Association canadienne française de l'Alberta, [SA 1964, c 107](#).

² *R c Mercure*, [\[1988\] 1 RCS 234](#) (concernant le bilinguisme judiciaire et statutaire).

³ *Mahé c Alberta*, [\[1990\] 1 RCS 342](#) (concernant le droit à l'instruction dans la langue de la minorité, notamment le droit de gestion et de contrôle de celle-ci).

⁴ *Caron c Alberta*, [2015 CSC 56](#) (concernant le bilinguisme judiciaire et statutaire).

Status of French in Alberta

Demographic Portrait

- 1) In addition to being one of Canada's two official languages, French was the first European language spoken on the land that became Alberta. The first French presence in Alberta dates back to the 18th century, over 200 years ago.
- 2) According to the 2016 Census, approximately 418,000 Albertans (10.5%) have French or French-Canadian origins.⁵ 88,220 Albertans (2.2%) have French as their mother tongue, and 268,605 Albertans (6.7%) report knowing French.⁶
- 3) Among Albertans with French as their mother tongue, 25% were born in Alberta, while 50% came from elsewhere in Canada and 24% from elsewhere in the world, mainly from Africa.⁷
- 4) French is the third most common mother tongue in Alberta after English ranked first (3,080,875) and Tagalog ranked second (99,035). However, when we consider language knowledge, French ranked second behind English.⁸
- 5) Alberta is the province with the highest French-speaking population growth. The number of Albertans with French as their mother tongue has increased by 31.4% over 15 years (2001-2016)⁹ and by over 50% since 1991¹⁰. French-English bilingualism increased by 30.5% between 2001 and 2016.¹¹ Factors such as immigration, interprovincial migration, and the increase in French first language and French immersion education programs have contributed to this growth.¹²
- 6) Alberta has the fourth-largest French-speaking population in Canada, after Quebec, Ontario, and New Brunswick. According to Statistics Canada projections, it is the province that will experience the most significant growth in its French-speaking population by 2036.¹³
- 7) In Alberta, the French-speaking population is scattered across the territory, unlike other French-speaking populations in Canada. Specifically, approximately one-third lives in Calgary, one-third in Edmonton, and the remaining third is

⁵ Government of Alberta. 2021. *Francophone heritage in Alberta*. <https://www.alberta.ca/francophone-heritage.aspx>

⁶ Statistics Canada. 2019. *The French language in Alberta, 2001 to 2016: facts and figures*. http://publications.gc.ca/collections/collection_2019/statcan/89-657-x/89-657-x2019016-eng.pdf

⁷ Government of Alberta. 2018. *The Francophonie in Alberta: strong and vibrant*. <https://open.alberta.ca/dataset/56de91f7-c69e-4fac-8e82-a3b8c9025f25/resource/f4bf7d7f-cda2-4910-9b8e-daeb496553e9/download/albertasfrancophonecommunitiesstrongandvibrant.pdf>

⁸ Statistics Canada. *Census Profile, 2016 Census, Alberta*.

⁹ Statistics Canada. 2019. *The French language in Alberta, 2001 to 2016: facts and figures*.

¹⁰ Statistics Canada. *Focus on Geography Series, 2016 Census*. <https://www12.statcan.gc.ca/census-recensement/2016/as-sa/fogs-spg/Facts-pr-eng.cfm?LANG=Eng&GK=PR&GC=48&TOPIC=5>

¹¹ Statistics Canada. 2019. *The French language in Alberta, 2001 to 2016: facts and figures*.

¹² Kadio, Danielle. « Les francophones augmentent plus vite en Alberta qu'ailleurs au Canada. » *Radio-Canada*, December 11, 2019, <https://ici.radio-canada.ca/nouvelle/1427525/francophonie-alberta-francais-canada>.

¹³ Government of Alberta. 2017. *French Policy*. <https://open.alberta.ca/publications/french-policy>

scattered throughout the province in medium-sized cities (Grande Prairie, Fort McMurray, Red Deer, Lethbridge), towns and cities with federal services (Jasper, Banff, and Canmore (National Parks); Wainwright and Cold Lake (Military Bases)), more traditional rural communities (Peace River area (St. Isidore, Guy, Marie-Reine, ...), St. Paul, Bonnyville, Legal, Morinville, Beaumont, etc.), and newer communities (Calgary and Edmonton suburbs, Brooks, etc.).

- 8) Alberta has four municipalities (Beaumont, Legal, Falher, and Plamondon) that declared themselves officially bilingual. These municipalities are among the twenty or so members of the Alberta Bilingual Municipalities Association (e.g., Bonnyville, Donnelly, Grande Prairie, Girouxville, Lac La Biche, Morinville, McLennan, Saint Paul, Smoky Lake).¹⁴
- 9) To serve this population, the ACFA has set up regional offices in 14 regions, and there are more than 40 Francophone schools in 28 Alberta communities, managed by four Francophone school boards.

Legislative Framework

- 10) Laws and policies govern the provision of French-language services in Canada. In Alberta, these laws and policies include (1) the *Official Languages Act* at the federal level and (2) the *French Policy* at the provincial level.
- 11) The *Official Languages Act*, adopted in 1969, recognizes French as one of the country's two official languages. This Act guarantees access to services in French in federal institutions.
- 12) The federal government amended the *Official Languages Act* was amended in 1988, 2005, and 2018 to include provisions to reflect better the needs of linguistic communities, such as taking positive measures to enhance the vitality of Francophone minority communities and advance the equality of English and French in Canada.
- 13) The *Official Languages Act* is currently under review; the federal government should modernize the Act in the coming year. In February 2021, the Government of Canada released a language reform document entitled *English and French: Towards a Substantive Equality of Official Languages in Canada*. In preparation for the upcoming modernization, this document proposes several elements to enhance the status of French across Canada and to ensure more services are available in French.¹⁵ On March 1st, 2022, the Minister of Official Languages, the Honourable Ginette Petitpas Taylor, introduced in the House of Commons of Canada Bill C-13, *An Act to amend the Official Languages Act, to enact the Use*

¹⁴ Alberta Bilingual Municipalities Association. <https://lecdea.ca/abma-en/?lang=en>

¹⁵ Government of Canada. 2021. *English and French: Towards a substantive equality of official languages in Canada*. <https://www.canada.ca/en/canadian-heritage/corporate/publications/general-publications/equality-official-languages.html>

*of French in Federally Regulated Private Businesses Act and to make related amendments to other Acts.*¹⁶

- 14) Regarding the *French Policy*, the Government of Alberta adopted this policy in 2017. It “applies to all Government of Alberta departments, agencies, boards and commissions.”¹⁷ Therefore, the provincial government has specific commitments regarding the French language.
- 15) Through the *French Policy*, the “Government of Alberta acknowledges the past, present and continued social, cultural and economic contributions of the province’s significant and diverse French-speaking population. Through meaningful engagement, dialogue, and collaboration, the government is committed to enhancing services in French to support the vitality of the Francophonie in Alberta in a targeted and sustainable manner as resources allow.”¹⁸
- 16) The current *French Policy* commits the province of Alberta to providing more services in French and that these be of “comparable quality” to those offered in English.¹⁹

¹⁶ Bill C-13, *An Act to amend the Official Languages Act, to enact the Use of French in Federally Regulated Private Businesses Act and to make related amendments to other Acts*, 1st Session, 44th Parliament, Canada, 2022. <https://www.parl.ca/DocumentViewer/en/44-1/bill/C-13/first-reading>

¹⁷ Government of Alberta. 2017. *French Policy*, p. 4.

¹⁸ Government of Alberta. 2017. *French Policy*, p. 2.

¹⁹ Government of Alberta. 2017. *French Policy*, p. 3.

Current state of French-language police services in Alberta

- 4) Since 1932, 90 years ago, the Royal Canadian Mounted Police ("RCMP") has been serving Alberta, both as provincial police and as municipal police outside of major cities like Calgary, Edmonton, and Lethbridge.
- 5) Of the 113 current RCMP detachments in Alberta, about 30 provide services in French or nearly 27%. Thus, French-speaking Albertans have access to services in French in the following municipalities: Airdrie, Bonnyville, Canmore, Chestermere, Cold Lake, Elk Point, Fort Chipewyan, Fort McMurray, Grande Prairie, Jasper, Lac La Biche, McLennan, Red Deer, St. Albert, and St. Paul.
- 6) Through these detachments designated bilingual, the federal government provides many services in both official languages, English and French.
- 7) Notably, within the RCMP's detachments designated bilingual, there are a number of bilingual positions, all of which are staffed by employees who can speak both English and French. As well, these same detachments provide guides and information explaining their employees' obligations under Part IV of the *Official Languages Act*.
- 8) The RCMP also offers an online course on the active offer of services in French that is available to all its employees to inform them of their obligations and how to handle requests in the minority language if employees cannot provide services themselves.
- 9) The RCMP's French-language services include an active offer in detachments designated bilingual, an online crime reporting website, and French language communications to the public, including social media posts. A bilingual mobile application, including a criminal record check for volunteers, a complaint filing system, and a map showing the distribution of crimes in the province, is also available.
- 10) The RCMP also provides several services in French to Francophone school communities, which supports equivalent education within Francophone schools. In particular, the RCMP provides French-language presentations in these schools and school liaison services by designating Francophone officers who are "on-call" and provide "community policing" type services to the community.
- 11) In addition to offering these services to the public, the RCMP is committed to consulting the Francophone community on its services in French in Alberta. To this end, there is an advisory committee with representatives from the RCMP and the Francophone community that meets at least twice a year.
- 12) With the creation of a provincial police force, it would be possible to see a decline in the provision of services in French since federal legislation is more restrictive in this area. It could also exacerbate certain problems already observed within the RCMP.

- 13) Indeed, despite the current provision of French-language services by the RCMP, media reports and recent Court of Queen's Bench of Alberta decisions have highlighted language bias and, consequently, a lack of respect for the rights of French-speaking Albertans in emergencies.
- 14) On April 14, 2021, a Radio-Canada article published in the context of the Police Act Review raised complaints of anti-French comments made by police officers in Alberta.²⁰
- 15) On June 10, 2021, the Court of Queen's Bench of Alberta rendered a decision in *Dubé v. RCMP*, 2021 ABQB 451. This case demonstrated that there was discrimination against Francophones within the police force. In summary, Franco-Albertan Mario Dubé was assaulted in 2006 by members of the Edmonton Police Service and the RCMP, who used excessive force. One of the language-related observations was that one of the officers was "irritated by Mr. Dubé speaking loudly in French," and officers took no steps to facilitate communication in French.²¹
- 16) On January 14, 2022, the Court of Queen's Bench of Alberta issued a judgment in *R c Benoit*, 2022 ABQB 46. The judge excluded the voluntary statement of a French-speaking accused from evidence because his constitutional rights under section 10(b) had been violated. The police did not take reasonable steps to ensure that the accused understood how to exercise his right to counsel of his choice, given his apparent language difficulties.²² According to a Radio-Canada article, the violation of constitutional rights under section 10 occurs "often" for French-speaking accused persons.²³
- 17) Furthermore, the Commissioner of Official Languages of Canada released a report in 2020 on the use of official languages in emergency situations, considering that several emergency situations have marked the last decade.²⁴ In this report, he highlights the importance of communicating in both official languages: "It is absolutely essential that provincial and territorial agencies—and all those who are responsible for the well-being of Canadians in emergencies—understand that there is a vast difference between using one's second official language to navigate daily life, social situations and the workplace and using that same language when one is injured, intimidated, or afraid for the safety of a loved one... Individual bilingualism is not absolute, and in emergency situations,

²⁰ Kado, Danielle. "Écouter les francophones pour mieux réformer la police en Alberta." *Radio-Canada*, April 14, 2021. <https://ici.radio-canada.ca/nouvelle/1784635/police-reforme-alberta-francophone-racisme-diversite?fbclid=IwAR2Y7N-lwGJmPBiuE705bKdwRHVul8EhQQ1obvB3zCtE95yqN0NE9weg8KI>

²¹ *Dubé v. RCMP*, 2021 ABQB 451. https://albertacourts.ca/docs/default-source/gb/judgments/dub%C3%A9-c-grc-2021-abqb-451---motifs-du-jugement.pdf?sfvrsn=89697283_5

²² *R c Benoit*, 2022 ABQB 46. <https://www.canlii.org/fr/ab/abqb/doc/2022/2022abqb46/2022abqb46.html>

²³ Rousseau, Stéphanie. "Un accusé francophone a été privé d'un droit constitutionnel, dit une juge albertaine." *Radio-Canada*, January 27, 2022. <https://ici.radio-canada.ca/nouvelle/1857847/alberta-loi-justice-avocat-francophonie-droit-linguistique>

²⁴ Office of the Commissioner of Official Languages. 2020. *A Matter of Respect and Safety: The Impact of Emergency Situations on Official Languages*. https://publications.gc.ca/collections/collection_2020/clo-ocol/SF31-147-2020-eng.pdf

it is only natural that Canadians revert to the instant ease and reassurance of their first official language."²⁵

Ontario's Case: Ontario Provincial Police

- 18) During the engagement session, the ministry mentioned that it wanted to draw inspiration from the practices in other Canadian provinces regarding their provincial police. By observing the situation in these provinces, particularly Ontario where there are provincial police services and an official language minority community, it is possible to identify certain elements.
- 19) Therefore, the ACFA contacted its Ontario counterpart, the Assemblée de la francophonie de l'Ontario, which drew up a portrait, presented below, of the French-language services available within the Ontario Provincial Police ("OPP").
- 20) The OPP is subject to the *French Language Services Act* of Ontario as it is a division of the Ministry of the Solicitor General. Therefore, the *French Language Services Act* recognizes the OPP as a government agency within the meaning of the Act. Thus, in the 27 regions of Ontario designated under the *French Language Services Act*, the OPP has an obligation to serve people in French.
- 21) In Ontario, the OPP headquarters and local/regional stations in the 27 designated areas have an obligation to provide services in French, which includes having bilingual tickets. In the event of an arrest, a citizen can request that service be offered in French. This offer can mean going to the police station to receive service in the language of their choice or waiting for a French-speaking police officer to arrive at the scene. If the service cannot be provided in French, it may result in legal proceedings.

²⁵ Office of the Commissioner of Official Languages. 2020. *A Matter of Respect and Safety: The Impact of Emergency Situations on Official Languages*, p.8.

Éléments à prendre en considération et recommandations

- 22) Since Alberta's Francophonie currently has access to French-language services from the RCMP, the ACFA expects these services to continue if the government decides to move forward with the creation of an Alberta Provincial Police Service ("APPS") to replace the RCMP.
- 23) However, the high transition and management costs that the province will incur in the transition are an additional concern and an increased risk of setbacks for French-speaking Albertans; the French aspect may be perceived as additional costs.
- 24) Furthermore, the new APPS would not be subject to the same legal requirements as the RCMP to ensure the provision of services in French to the French-speaking population of Alberta. The Commissioner of Official Languages of Canada sent a letter to the Minister of Justice and the Solicitor General of Alberta on January 20, 2022, to express the consequences of the APPS no longer being subject to the *Official Languages Act*.²⁶
- 25) Therefore, the ACFA is concerned that creating an APPS to replace the RCMP would be to the detriment of Alberta's Francophonie and humbly submits to you some elements to consider and some recommendations should the Government of Alberta go ahead with this decision.

Governance

- 26) The Government of Alberta's *French Policy* states that, "ministries will consider Francophonie perspectives and opportunities to improve services in French when new Government of Alberta programs and services are being developed."²⁷ To meet this requirement, the government must consult the French-speaking Alberta community on how the new provincial policing service offering is developed.
- 27) The APPS model proposed by PwC includes a Provincial Police Commission that will be comprised of representatives from various groups, such as members representing rural communities, urban communities, aboriginal communities, and the ministry.²⁸ The Government of Alberta should also include representation from the francophone community on this commission to ensure accountability to Alberta's Francophonie and implement the *French Policy*.
- 28) The Ministry of Justice and Solicitor General should also include stakeholders from Alberta's Francophonie (e.g., ACFA, Association des juristes d'expression française de l'Alberta (AJEFA), Alliance jeunesse famille de l'Alberta Society

²⁶ Black, Matthew. "Official languages watchdog concerned over future of French language policing if Alberta drops RCMP." *CTV News*, March 11, 2022. <https://edmonton.ctvnews.ca/official-languages-watchdog-concerned-over-future-of-french-language-policing-if-alberta-drops-rcmp-1.5815446>

²⁷ Government of Alberta. 2017. *French Policy*, p. 6.

²⁸ PWC. 2021. *APPS Transition Study Final Report*, p.13.

(AJFAS), or others) as community partners in the operations model proposed in the PwC report.

Human Resources: Training and Recruitment

- 29) As mentioned earlier, several communities in Alberta are officially bilingual (e.g., Falher, Plamondon, Beaumont, and Legal) or are part of the Alberta Bilingual Municipalities Association. Some APPS recruits from these communities would speak French and, therefore, be able to serve their communities in both official languages.
- 30) As is proposed in the case of visible minorities and to meet the guiding principles of the PwC report, such as the need to "incorporate the unique characteristics of Alberta and serve the province's pluralistic, multiracial and multicultural communities,"²⁹ the APPS should establish quotas to ensure the hiring of French-speaking human resources.
- 31) Currently, the RCMP encourages inter-provincial mobility of its officers. This reality facilitates the recruitment of French-speaking officers in Alberta. In the event the Government of Alberta establishes an APPS, it should plan to develop a recruitment program to promote the hiring of French-speaking officers in Alberta in consultation with Alberta's Francophonie stakeholders.
- 32) To establish a recruitment program for an APPS, as suggested in the PwC report, the Government of Alberta could mobilize Alberta's French-language post-secondary institutions, Campus Saint-Jean and the Centre collégial de l'Alberta. The use of French-language post-secondary institutions would make it possible to include a French component in the training of provincial police officers and other personnel required for the proper functioning of an APPS to "deploy a capable workforce that reflects the communities they serve."³⁰

Mental Health

- 33) Under the model proposed by PwC, an APPS would establish teams of mental health professionals to expand the reach of these services throughout the province. Considering that both the Ministry of Health and Alberta Health Services recognize that language is a determinant of health, the government should "adopt a citizen centred approach that is responsive to the needs of individuals and communities"³¹ and consider the specificities of Alberta's Francophonie in the designation of these specialized services, the hiring of French-speaking human resources, and the deployment of French-language mental health support services.

Deployment

- 34) In pursuit of the goal of community-based policing, the government should include a French-language service offer that allows rural French-speaking

²⁹ PWC. 2021. *APPS Transition Study Final Report*, p.10.

³⁰ PWC. 2021. *APPS Transition Study Final Report*, p.10.

³¹ PWC. 2021. *APPS Transition Study Final Report*, p.10.

Albertans to access services that would otherwise only be available in urban areas, within the network model proposed by PwC.

Service Delivery

- 35) The model proposed by PwC indicates that an APPS would have at least the same number of detachments as the RCMP. PwC also proposes that an APPS would retain some resources (e.g., employees) from these detachments. Thus, there would theoretically be about 30 detachments that would have the capacity to provide services in French.
- 36) To adhere to the guiding principles of the PwC report, which include adopting a citizen-centered approach that responds to the needs of individuals, deploying a workforce that reflects the communities, and incorporating the unique characteristics of Alberta³², the government should commit to continuing to offer French-language services from the RCMP and to consulting with the Francophone community. This commitment would avoid the loss of French-language services already available in areas with bilingual detachments and amplify the problems experienced by French-speaking Albertans when police services are offered in English only.
- 37) To facilitate the provision of French-language services when requested, the government should require the official identification of bilingual personnel within an APPS.
- 38) When putting in place resources (e.g., signage, documents, etc.) for the new provincial police service, the government should already plan for an English-French translation based on what is already available from the RCMP. This step would avoid the additional cost of translation at a later date.
- 39) To maintain the school liaison services offered by the RCMP, the Government of Alberta should commit, in the eventual development of an SPPA, to consulting with Alberta's Francophonie stakeholders to develop this offer of services that are essential to the health and safety of Alberta's French-speaking children and youth and to ensure that the government offers an equivalent experience in Francophone schools.

Integration

- 40) Since the PwC model suggests the development of training standards within the APPS, the government should ensure that a collaborative, learning, and citizen-centered provincial police service is formed³³ by including, as suggested in the case of Aboriginal communities, the history, culture, and plural Francophone experiences within this training. This action would implement the *French Policy* with concerning the recognition and visibility of Alberta's Francophonie by the Government of Alberta.³⁴

³² PwC. 2021. *APPS Transition Study Final Report*, p.10.

³³ PwC. 2021. *APPS Transition Study Final Report*, p.9-10.

³⁴ Government of Alberta. 2017. *French Policy*, p. 4.

Costs and Funding

- 41) Given the estimated costs of \$734 to \$748 million for the creation of a provincial police force, the Government of Alberta should consider joining the *Contraventions Act Fund*. Signing on to this Act would allow Alberta to obtain funding to support a series of measures including the hiring of bilingual personnel, language training, interpretation services, as well as bilingual signage and documentation.³⁵
- 42) Alberta is also not receiving its fair share from the federal government under the *Canada-Alberta Agreement on French-Language Services*. By ensuring the provision of French-language services in the creation and implementation of an APPS, the government could use the *French Policy* in the negotiation of federal-provincial agreements to increase funding for the provision of French language services.³⁶

³⁵ Government of Canada. 2021. *Contraventions Act Fund*. <https://www.justice.gc.ca/eng/fund-fina/gov-gouv/contraventions.html>

³⁶ Government of Alberta. 2017. *French Policy*, p. 6.