

The NCCC Submissions to Canada in February 2025 (suggested direction from the Commission)

1. Collapse all proposed committees in the FSA into a National Body comprised of the Rights Holders
2. National technical secretariat, which includes NAC and EAC, to provide to support to the National Body (many of these entities already exist - these do the actual implementation work)
3. Regional technical secretariats to support work of National technical secretariat
4. Clarification that the funding responsibility does not disappear at the 10 year mark. Canada's obligation is to ensure the discrimination is eliminated and does not reoccur.
5. Use of IFSD's measuring-to-thrive framework (see report) as a starting point: needs-based funding approaches that prioritize substantive equality, and which address any adverse effects related to per capita funding approaches consistent with the CHRT's funding principles, including substantive equality, best interests of the child, culturally appropriate, distinct community circumstances. Creation of pools of funding for regional approaches and capacity building.
6. For First Nations and Agencies with surpluses there should be a provision to use for capacity building based on a workplan and then they can become eligible for the capacity building fund as well. This will reduce the exposure for Canada and ensure dispensed funds are able to be put to use Funding must be sufficient to meet the principles of the Agreement and other legislative and regulatory requirements that are consistent with the principles of this Agreement (e.g., the language Act).
7. First Nations and Agencies provide services to children and families wherever they reside (as per C-92 minimum standards). IRS does not capture the entire population served. Funding must not rely solely on the per capita formulas, especially those tied to the IRS. Parties must work towards a population framework, such as a First Nations led census, to estimate the actual population served.