

**IN THE SUPREME COURT OF CANADA**  
(ON APPEAL FROM THE COURT OF APPEAL FOR ONTARIO)

BETWEEN:

**RYAN ALFORD**

**APPELLANT**  
(Appellant)

-and-

**CANADA (ATTORNEY GENERAL)**

**RESPONDENT**  
(Respondent)

-and-

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COMMONS**

**INTERVENERS**

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**FACTUM OF THE INTERVENER,  
SPEAKER OF THE LEGISLATIVE ASSEMBLY OF ONTARIO**  
(Pursuant to Rule 42 of the *Rules of the Supreme Court of Canada*, S.O.R./2002-156)

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## Table of Contents

	Page
PART I – OVERVIEW AND STATEMENT OF FACTS.....	1
<b>A. Overview.....</b>	<b>1</b>
<b>B. Statement of Facts .....</b>	<b>2</b>
PART II – RESPONSE TO QUESTIONS IN ISSUE.....	4
PART III – STATEMENT OF ARGUMENT.....	4
<b>A. Privileges belong to legislative bodies, even when exercisable by their members..</b>	<b>4</b>
i. In the organizing framework for parliamentary privilege, parliament, rather than parliamentarians, is the focus .....	4
ii. Freedom of speech, while crucial, operates within the same framework as other privileges and is not categorically distinct nor immune from limitations imposed by legislative bodies .....	8
<b>B. Restrictions as to how legislative bodies exercise their privileges limit their ability to exercise their constitutional functions with dignity and efficiency.....</b>	<b>10</b>
<b>C. The vehicle by which to scope and limit privileges is a legislative body’s choice. </b>	<b>13</b>
i. Legislative bodies exercise, including through scoping and limiting, privileges by various vehicles .....	13
ii. Eliminating ordinary legislation as a vehicle by which to exercise privilege jeopardizes existing exercises of privilege beyond the federal level.....	18
PART IV – SUBMISSIONS ON COSTS .....	20
PART V – ORDER REQUESTED.....	20
PART VI – SUBMISSIONS ON PUBLICATION .....	20
PART VII – AUTHORITIES .....	21
<b>Caselaw .....</b>	<b>21</b>
<b>Secondary Sources .....</b>	<b>22</b>
<b>Statutes, Regulations, Rules, etc. ....</b>	<b>23</b>
<b>Other Sources .....</b>	<b>24</b>

## PART I – OVERVIEW AND STATEMENT OF FACTS

### A. Overview

1. In the decision below, the Court of Appeal for Ontario held that it is within federal parliament’s competence, exercising its plenary legislative authority, to limit the right to freedom of speech and debate of parliamentarians in the manner laid out in s. 12 of the *National Security and Intelligence Committee of Parliamentarians Act* [NSICPA].<sup>1</sup> The Court determined that parliamentary privilege exists to protect the legislative branch’s independence, and that the ability of federal parliament to legislate its privileges, pursuant to s. 18 of the *Constitution Act, 1867*, is “consistent with, and promotes, the independence of Parliament by recognizing Parliament’s ability to define its own powers, privileges, and immunities”.<sup>2</sup>

2. The Speaker of the Legislative Assembly of Ontario (the “**Speaker**”) is the presiding officer of the Legislative Assembly of Ontario (the “**Assembly**”), as well as the guardian of the rights, immunities, privileges, and powers of the Assembly, its committees, and its Members.<sup>3</sup> The Speaker intervenes in this Honourable Court to make the following submissions.

3. First, parliamentary privileges are constitutional in nature. Such privileges are necessary for legislative bodies to carry out their constitutional functions with dignity and efficiency. Legislative bodies exercise their constitutional functions as collectives, and parliamentary privileges belong to them as collectives, some of which are exercisable by their members. As privilege inures to the benefit of a legislative body as a whole, with the effective functioning of the body as its basis, an organization of privileges that reflects and reinforces these ideas is necessary for legislative bodies to exercise their constitutional role.

4. Second, restrictions as to how, and in what manner, a legislative body can scope and limit its authoritatively established privileges undermine its ability to carry out its constitutional functions with dignity and efficiency. An approach to the law of privilege that questions a

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<sup>1</sup> *National Security and Intelligence Committee of Parliamentarians Act*, [SC 2017, c 15](#); *Alford v Canada (Attorney General)*, [2024 ONCA 306](#) at para [13](#) [*Alford*].

<sup>2</sup> *Constitution Act, 1867* (UK), [30 & 31 Vict, c 3](#), s [18](#), reprinted in RSC 1985, Appendix II, No 5 [*Constitution Act, 1867*]; *Alford*, *supra* note 1 at paras [46-47](#).

<sup>3</sup> *Legislative Assembly Act*, [RSO 1990, c L.10](#), s [28.1](#) [*LAA*].

legislative body's decision to scope and limit its authoritatively established privileges would open the door to judicial scrutiny, and potential third-party interference, with that which this Court has repeatedly declared to be within the sole competence of these bodies — the exercise of parliamentary privilege.

5. Finally, the vehicle that a legislative body selects to implement its will in exercising its privileges does not fundamentally change the nature of the action — it remains an exercise of privilege. A legislative body's own privileges can be, and regularly are, scoped and limited by various vehicles, including through legislation. While the legislative route may be more onerous than other methods by which privileges are scoped, such as an order of the House, it is open to a legislative body to adopt a more onerous method of exercising its privileges.

## **B. Statement of Facts**

6. The Speaker takes no position on the facts or procedural history of this matter. A brief factual overview of the Assembly and the Speaker's role follows below.

7. Pursuant to section 69 of the *Constitution Act, 1867*, the Legislature for Ontario consists of the Lieutenant Governor and the Assembly.<sup>4</sup> This is the legislative branch for Ontario.

8. As a legislative body, a key function of the Assembly is the debate, amendment, and passage of legislation. All Members, except the Speaker, may initiate legislative proposals, participate in debate, and vote in proceedings. Further, the Assembly holds the government to account for the conduct of the province's business. Finally, as the grand inquest for Ontario, the Assembly provides a forum on matters related to the Province's well-being.<sup>5</sup>

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<sup>4</sup> *Constitution Act, 1867*, *supra* note 2, s [69](#).

<sup>5</sup> *Laurentian University of Sudbury*, [2022 ONSC 429](#) at paras [42-45](#), [52](#).

9. From an internal perspective, the Assembly is the master of its proceedings and has exclusive jurisdiction with respect to its internal affairs and procedures.<sup>6</sup> In general, Members of the Assembly are able to dictate and amend procedures through majority vote.<sup>7</sup>

10. The Assembly's will is implemented through legislation, orders, and resolutions, on which each Member is entitled to vote. As the democratic forum, the Assembly operates as a collective, through majority vote.<sup>8</sup>

11. On behalf of itself and its Members, the Assembly holds a set of constitutionally enshrined parliamentary privileges, without which it could not discharge its constitutional, legislative, and deliberative functions, nor its work in holding the government to account.<sup>9</sup> These privileges were inherited by the Assembly through the Preamble to the *Constitution Act, 1867*.<sup>10</sup>

12. The Speaker is the chief presiding officer of the Assembly and plays a key role in administering its business, and in exercising, and preserving, parliamentary privilege. The Speaker presides over all deliberations and debates of the Assembly and is responsible for making all procedural rulings, as well as for maintaining the orderly conduct of the business of the House.<sup>11</sup> Once elevated to the position of Speaker by the other Members, the Speaker assumes a neutral role, independent of the Government or any political parties.

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<sup>6</sup> J P Joseph Maingot, *Parliamentary Immunity in Canada* (Toronto: LexisNexis Canada Inc, 2016) at 166-168, Book of Authorities of the Speaker of the Legislative Assembly of Ontario dated June 25, 2025 [“**LAO BOA**”] Tab 1.

<sup>7</sup> *Constitution Act, 1867*, *supra* note 2, ss [49](#), [87](#).

<sup>8</sup> *Constitution Act, 1867*, *supra* note 2, ss [49](#), [87](#).

<sup>9</sup> *Chagnon v Syndicat de la fonction publique et parapublique du Québec*, [2018 SCC 39](#) at para [1](#) [*Chagnon*]; *Canada (House of Commons) v Vaid*, [2005 SCC 30](#) at paras [29](#), [41](#), [46](#) [*Vaid*].

<sup>10</sup> *Vaid*, *supra* note 9 at para [29\(3\)](#). For the provinces, there has been a statutory basis for parliamentary privilege since the 19<sup>th</sup> century (Charles Robert & David Taylor, “[Then and Now: Necessity, the Charter and Parliamentary Privilege in the Provincial Legislative Assemblies of Canada](#)” (2012) 80 *The Table* 17 at [19](#)).

<sup>11</sup> *LAA*, *supra* note 3, s [29\(1\)](#).

13. Per parliamentary law, custom, and the *Legislative Assembly Act [LAA]*, the Speaker is the guardian of the rights, privileges, and powers of the Assembly, its committees, and its Members.<sup>12</sup> The Speaker is duty-bound to oversee the exercise and protection of those privileges.

## **PART II – RESPONSE TO QUESTIONS IN ISSUE**

14. As an intervener, the Speaker takes no position on the questions in issue. To assist the Court in considering those questions, the Speaker provides the submissions below.

## **PART III – STATEMENT OF ARGUMENT**

### **A. Privileges belong to legislative bodies, even when exercisable by their members**

15. An approach to the law of privilege that requires a constitutional amendment to alter or “abrogate” the privileges of legislative bodies is inconsistent with established law, parliamentary practices, and conventions. Moreover, it dilutes the authority of legislative bodies to determine when and how their privileges are exercised.

*i. In the organizing framework for parliamentary privilege, parliament, rather than parliamentarians, is the focus*

16. In its *2013-2014 Report on Parliamentary Privilege*, the UK Joint Committee on Parliamentary Privilege referred to privilege as “the range of freedoms and protections each House needs to function effectively: in brief, it comprises the right of each House to control its own proceedings and precincts, and the right of those participating in parliamentary proceedings, whether or not they are Members, to speak freely without fear of legal liability or other reprisal.”<sup>13</sup> This definition properly centralizes legislative bodies as the holders of privilege, as opposed to individuals participating in parliamentary proceedings and their rights. The UK Joint Committee’s conceptualization of privilege has been echoed by this Court in *Canada (House of Commons) v Vaid [Vaid]*, where Binnie J., writing for a unanimous Court, quoted the Committee

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<sup>12</sup> *LAA*, *supra* note 3, s [28.1](#).

<sup>13</sup> United Kingdom, House of Lords, House of Commons, Joint Committee on Parliamentary Privilege, [Parliamentary Privilege: Report of Session 2013-14](#) (London: Stationery Office, 03 July 2013) at [3](#).

in stating that, “Privilege ‘does not embrace and protect activities of *individuals*, whether members or non-members, simply because they take place within the precincts of Parliament’”.<sup>14</sup>

17. It is beyond doubt that certain parliamentary privileges are generally exercisable by individual parliamentarians as opposed to legislative bodies themselves. These include not only freedom of speech, but also freedom from arrest in civil process, exemption from jury service, exemption from summons as a witness, and freedom from obstruction, interference, intimidation and molestation.<sup>15</sup> However, the basis of all of these “individual privileges” is to allow parliamentarians to attend to their parliamentary duties without disturbance so that the *legislative bodies* to which they belong may *perform their functions without disturbance and guard their autonomy*.<sup>16</sup> The Court of Appeal for Ontario, citing the Divisional Court for Ontario, has succinctly stated that privilege comprises those rights and immunities that are “recognized as being necessary to ensure that *the legislature* is *independent and able to carry out its functions*” [emphasis added].<sup>17</sup> It is for this reason that breaches of privilege are dealt with as contempts of *parliament* as opposed to contempts of *individual parliamentarians*.<sup>18</sup>

18. Parliamentarians are only afforded applicable rights, immunities, and privileges by virtue of their office — members would not require privileges facilitating their service to legislative bodies if they were not members. In reviewing the history of parliamentary privilege in the UK in *Chagnon v Syndicat de la fonction publique et parapublique du Québec*, this Court noted that, for a time, members of the House of Commons sought to use the protection of parliamentary privilege in their private lives. This Court specifically rejected the use of privilege in this way, stating, “Such an appeal to privilege is improper as the protection sought does not help preserve the separation of powers and promote the proper functioning of representative democracy.”<sup>19</sup>

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<sup>14</sup> *Vaid*, *supra* note 9 at para [29\(1\)](#).

<sup>15</sup> Maingot, *supra* note 6 at 18, LAO BOA Tab 1; [House of Commons Procedure and Practice, 3rd ed](#), by Robert Marleau and Camille Montpetit, eds (Ottawa: House of Commons, 2017) at [Chapter 3 \(Parliamentary Privilege: A Definition\)](#) [*HoC Procedure and Practice*].

<sup>16</sup> *Ibid.*

<sup>17</sup> *Ontario (Speaker of the Legislative Assembly) v Ontario (Human Rights Commission)* (2001), [54 OR \(3d\) 595](#) at para [8](#) (ONCA), *aff’g* (2000), [196 DLR \(4th\) 136](#) (Ont Div Ct) [*Legislative Prayers Case*].

<sup>18</sup> Maingot, *supra* note 6 at 18, LAO BOA Tab 1.

<sup>19</sup> *Chagnon*, *supra* note 9 at para [26](#).

This view of privilege is also demonstrated through the operation and established limits of individual privileges.

19. The basis of exemptions for parliamentarians from civil arrest, jury duty, and summons in judicial/quasi-judicial proceedings is that legislative bodies have the “pre-eminent claim to the attendance and service of [their] Members, free from restraint or intimidation”.<sup>20</sup> This is emphasized by the fact that these privileges are only exercisable while legislative bodies are in session, or shortly before/after a session, so that parliamentarians may attend to parliamentary duties.

20. Courts across Canada have not been consistent in expressing the temporal limitations of the individual privileges above.<sup>21</sup> In Ontario, these privileges are exercisable for a period of time before and after a session, in addition to during the session itself. Per the *LAA*, Members of Provincial Parliament (“**MPPs**”) are exempt from civil arrest and jury duty while the Assembly is in session, and in the 20 days before or after a session.<sup>22</sup> Similar temporal limitations exist through common law for exemptions from summons in judicial/quasi-judicial proceedings, whereby exemptions are only available while the Assembly is in session and for a period of 40 days before and after a session.<sup>23</sup>

21. Regardless of inconsistencies in protection outside a session, the consistent protection afforded when legislative bodies are in session underscores the basis of the immunities. It is the risk of distracting parliamentarians from their obligations *to parliament* that is intolerable.

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<sup>20</sup> *HoC Procedure and Practice*, *supra* note 15 at Chapter 3 ([Freedom from Arrest in Civil Actions, Exemption from Jury Duty, Exemption from Being Subpoenaed to Attend Court as a Witness](#)); *Erskine May’s Treatise on the Law, Privileges, Proceedings and Usage of Parliament*, 25th ed, by David Natzler and Mark Hutton, eds (London: LexisNexis, 2019) at para 14.1.

<sup>21</sup> *Ainsworth Lumber Co v Canada (AG) and Paul Martin*, [2003 BCCA 239](#) at para 45; *Samson Indian Nation and Band v Canada (FC)*, [2003 FC 975](#) at paras 42-45.

<sup>22</sup> *LAA*, *supra* note 3, ss [38](#), [40](#). Note that for federal parliament, the exemption from civil arrest extends to 40 days before/after a session (*HoC Procedure and Practice*, *supra* note 15 at [Chapter 3 \(Freedom from Arrest in Civil Actions\)](#)).

<sup>23</sup> *Telezone Inc v Canada (Attorney General)* (2004), [69 OR \(3d\) 161](#) at paras 41-44 (Ont CA); *Ontario (Premier) v Canada (Commissioner of the Public Order Emergency Commission)*, [2022 FC 1513](#) at para 38.

22. When attending to a legal obligation does not distract from parliamentary obligations, individual privileges have not been insisted on by legislative bodies. For example, in 2017, former Ontario Premier Kathleen Wynne appeared as a witness in court proceedings, regardless of the Assembly being in session, without objection by the Assembly.<sup>24</sup>

23. Similarly, freedom from obstruction, interference, intimidation, and molestation is tied to the performance of parliamentary functions. When obstruction is not in the performance of parliamentary duties and functions, privilege does not attach.<sup>25</sup> This holds true for when a parliamentarian’s reputation is unjustly attacked—such actions are only considered an obstruction protected by privilege if the parliamentarian is somehow prevented from performing his or her parliamentary functions.<sup>26</sup> Speakers have consistently held that obstruction with respect to extra-parliamentary political, partisan, or constituency-related functions does not amount to a breach of privilege.<sup>27</sup>

24. Jurisprudence in Ontario has explicitly acknowledged that “barricading the legislative buildings at Queen's Park such that Members of Provincial Parliament and essential service workers can neither enter nor exit the buildings, *thereby interrupting the work of the legislature*, constitutes a violation of parliamentary privilege, and consequently a breach of one of the fundamental tenets of our political system” [emphasis added].<sup>28</sup> This privilege extends beyond

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<sup>24</sup> Legislative Assembly of Ontario, *Official Report of Debates (Hansard)*, [41-2, No 90 \(11 September 2017\)](#) at [4816](#) (Hon Kathleen O Wynn).

<sup>25</sup> *HoC Procedure and Practice*, *supra* note 15 at [Chapter 3 \(Other Examples of Obstruction, Interference and Intimidation\)](#); *Journals of the Legislative Assembly of Ontario*, [35-2, vol 124](#) (14 July 1992) at [172-174](#); Legislative Assembly of Ontario, *Official Report of Debates (Hansard)*, [39-2, No 81 \(08 December 2010\)](#) at [4072](#) (Hon Steve Peters).

<sup>26</sup> *HoC Procedure and Practice*, *supra* note 15 at [Chapter 3 \(Other Examples of Obstruction, Interference and Intimidation\)](#); Legislative Assembly of Ontario, *Official Report of Debates (Hansard)*, [40-1, No 77 \(11 September 2012\)](#) at [3508-3509](#) (Hon Dave Levac).

<sup>27</sup> *HoC Procedure and Practice*, *supra* note 15 at [Chapter 3 \(Constituency-Related or Politically Related Instances\)](#); Legislative Assembly of Ontario, *Official Report of Debates (Hansard)*, [42-1, No 7 \(23 July 2018\)](#) at [226-227](#) (Hon Ted Arnott); Legislative Assembly of Ontario, *Official Report of Debates (Hansard)*, [40-1, No 33 \(03 April 2012\)](#) at [1459-1461](#) (Hon Dave Levac).

<sup>28</sup> *Ontario (Speaker of the Legislative Assembly) v Casselman*, [1996] OJ No 5343 at para 20 (Ont Ct J (Gen Div)) (QL) [*Casselman*], LAO BOA Tab 2.

just parliamentarians, also covering staff necessary to facilitate the functioning of legislative bodies.<sup>29</sup>

25. The development of the “individual privileges” above demonstrates that legislative bodies and their functioning, as institutions, are the basis of privileges exercisable by parliamentarians. While parliamentarians enjoy all the immunity to perform their parliamentary work, this privilege is nevertheless subject to the practices and procedures of the House.<sup>30</sup> The rights of parliamentarians are not stand-alone — they exist as a corollary to the rights of legislative bodies and are subject to the decisions of these bodies respecting their privileges. The House maintains absolute and exclusive jurisdiction over its members.<sup>31</sup>

*ii. Freedom of speech, while crucial, operates within the same framework as other privileges and is not categorically distinct nor immune from limitations imposed by legislative bodies*

26. Like all parliamentary privileges, freedom of speech is a right afforded to parliamentarians to facilitate the functioning of the legislative bodies to which they belong, rather than to assist them personally. In the leading authority on parliamentary privilege in Canada, J.P. Joseph Maingot states that:

The privilege of freedom of speech, though of a personal nature, is not so much intended to protect the Members against prosecutions for their own individual advantage, but to support the rights of the people by enabling their representatives to execute the functions of their office without fear of either civil or criminal prosecutions. [...]

The importance of this right is such that a Member of the Senate or the House of Commons may with impunity, and subject only to the rules, customs and practices of the House of Commons, make statements in Parliament that would elsewhere be an infraction of the *Official Secrets Act*.<sup>32</sup>

27. The Court of Appeal for Ontario has affirmed this position in its decision in *Roman Corp v Hudson’s Bay Oil and Gas Corp*, where it stated, in addressing freedom of speech, that, “The

<sup>29</sup> *Casselman*, *supra* note 28, LAO BOA Tab 2; Maingot, *supra* note 6 at 214, LAO BOA Tab 1.

<sup>30</sup> Maingot, *supra* note 6 at 16, LAO BOA Tab 1.

<sup>31</sup> *Ibid* at 164-165.

<sup>32</sup> *Ibid* at 26.

object of the privilege is, of course, not to further the selfish interests of the Member of Parliament but to protect him from harassment in and out of the House in his legitimate activities in carrying on the business of the House; consideration of the interest of the public in this regard overbears the usual solicitude in our law for the private individual.”<sup>33</sup>

28. Freedom of speech has been recognized since the reign of King William III and Queen Mary II in art. 9 of the *Bill of Rights of 1689*, which states, “That the Freedom of Speech and Debates or Proceedings in Parliament ought not to be impeached or questioned in any Court or Place out of Parliament.”<sup>34</sup> It is, by the language of art. 9, tied to proceedings in parliament and intended to “protect the Members from possible deprivation by other branches of government – the Crown or executive – or indeed the courts of law.”<sup>35</sup> It is *not* intended to protect parliamentarians from possible deprivation by legislative bodies themselves, which have the authority to set standards with respect to parliamentary conduct as they see fit.<sup>36</sup> Freedom of speech is broad, and this Court has acknowledged that its necessity speaks for itself; however, it is not free from limitations and constraints imposed by the legislative body whose constitutional functions it is designed to facilitate.<sup>37</sup> This indicates that, as for all “individual privileges”, the appropriate framework is one that features legislative bodies as the ultimate holders of privilege.

29. Moreover, the fact that freedom of speech extends beyond parliamentarians to individuals who appear before the House or its committees supports the contention that freedom of speech does not belong to any one individual, but rather to legislative bodies themselves.<sup>38</sup> As for parliamentarians, the basis for affording freedom of speech to the testimony of parliamentary

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<sup>33</sup> *Roman Corp v Hudson's Bay Oil & Gas Co*, [1972] 1 OR 444 at 451 (ON CA), aff'd [1973] SCR 820 (SCC).

<sup>34</sup> *Bill of Rights, 1689* (UK), [1688] 1 Will & Mar (2nd Sess), c 2, art 9.

<sup>35</sup> Maingot, *supra* note 6 at 26, LAO BOA Tab 1.

<sup>36</sup> *Ibid* at 168-169; *Legislative Prayers Case*, *supra* note 17 at para 48; *Morin v Crawford*, 1999 CanLII 6802 at paras 66-67 (NWT SC).

<sup>37</sup> *New Brunswick Broadcasting Co v Nova Scotia (Speaker of the House of Assembly)*, [1993] 1 SCR 319 at 385-386 (SCC) [*New Brunswick Broadcasting*]; Maingot, *supra* note 6 at 35, LAO BOA Tab 2.

<sup>38</sup> *HoC Procedure and Practice*, *supra* note 15 at Chapter 3 (Importance of Freedom of Speech); *Gagliano v Canada (AG)*, 2005 FC 576 at para 67, aff'd 2006 FCA 86 [*Gagliano*]; *Canada (Deputy Commissioner, Royal Canadian Mounted Police) v Canada (Commissioner, Royal Canadian Mounted Police)*, 2007 FC 564 at para 63 [*Canada (RCMP)*].

witnesses is to encourage them to speak openly, to facilitate parliament’s function as the grand inquest of the nation (or province for provincial legislative assemblies).<sup>39</sup> Without the ability to protect witnesses by extending freedom of speech, the investigative and deliberative functions of legislative bodies would be compromised because witnesses would be less forthcoming.<sup>40</sup>

30. If parliamentary privilege is viewed as a personal right of parliamentarians that can supersede the ability of legislative bodies to manage their privileges in their sole discretion, this turns the existing framework of privilege on its head and appears to cast aside the very reason for the existence of “individual privileges” — to allow legislative bodies, as collectives, to carry out their functions with dignity and efficiency.<sup>41</sup>

31. In addition, parliamentary privilege is intended to allow legislative bodies to carry out their constitutional functions without *outside* interference.<sup>42</sup> While it is true that parliamentarians, as well as other individuals, may exercise certain privileges, these privileges belong to legislative bodies.<sup>43</sup> Any decision that removes the right of a legislative body to autonomously regulate its privileges, like requiring a constitutional amendment to enact legislated limits on freedom of speech, would represent a marked departure from the current state of the law of privilege. However, to *require*, instead of merely permit, Crown intervention in the exercise of parliamentary privilege, regardless of whether the Crown has the discretion to refuse assent, challenges the independence and dignity of legislative bodies.

**B. Restrictions as to how legislative bodies exercise their privileges limit their ability to exercise their constitutional functions with dignity and efficiency**

32. The fundamental purpose of parliamentary privilege is to provide legislative bodies with the necessary autonomy they require to carry out their functions with dignity and efficiency.<sup>44</sup> This Court has, time and time again, affirmed that the independence of legislative bodies is an

<sup>39</sup> *Gagliano*, *supra* note 38 at paras [73-88](#); *Canada (RCMP)*, *supra* note 38.

<sup>40</sup> *Canada (RCMP)*, *supra* note 38 at para [64](#); *Guergis v Novak et al*, [2022 ONSC 3829](#) at para [76](#).

<sup>41</sup> *Vaid*, *supra* note 9 at paras [41-46](#); *New Brunswick Broadcasting*, *supra* note 37 at [382-383](#).

<sup>42</sup> *Vaid*, *supra* note 9 at para [46](#); *Chagnon*, *supra* note 9 at para [29](#).

<sup>43</sup> *Ontario v Rothmans Inc*, [2014 ONSC 3382](#) at para [21](#); *HoC Procedure and Practice*, *supra* note 15 at [Chapter 3 \(Parliamentary Privilege: A Definition\)](#).

<sup>44</sup> *New Brunswick Broadcasting*, *supra* note 37 at [378-379](#); *Chagnon*, *supra* note 9 at para [1](#); *Duffy v Canada (Senate)*, [2020 ONCA 536](#) at paras [31-32](#) [*Duffy*].

important characteristic of our constitutional order and system of government.<sup>45</sup> In *Vaid*, this Court aptly instructed that, “It is a wise principle that the courts and Parliament strive to respect each other’s role in the conduct of public affairs. Parliament, for its part, refrains from commenting on matters before the courts under the *sub judice* rule. The courts, for their part, are careful not to interfere with the workings of Parliament.”<sup>46</sup>

33. Although it is still developing, the law of privilege in Canada makes certain matters clear. It is the proper role of the judiciary to review a claim to a category of privilege and determine whether the claimed privilege is so closely related to a legislative body’s ability to carry out its legislative and deliberative functions with dignity and efficiency that it attracts the extraordinary immunity provided by parliamentary privilege.<sup>47</sup> The courts undoubtedly determine categories of privilege.<sup>48</sup> However, once a category is defined, the role of the judiciary ends.

34. Once a category of privilege is defined, a legislative body’s role begins in determining how and when to exercise its privilege. This Court has succinctly stated that, “within categories of privilege, Parliament is the judge of the occasion and manner of its exercise and such exercise is not reviewable by the courts”.<sup>49</sup> It has also cautioned that, “Judicial review of the exercise of parliamentary privilege, even for *Charter* compliance, would effectively nullify the necessary immunity this doctrine is meant to afford the legislature”.<sup>50</sup> In effect, once the judiciary has defined the outer limits of a privilege, it is for legislative bodies to decide what happens within these limits.

35. In the case of freedom of speech, the judiciary has firmly established its existence as a category of privilege.<sup>51</sup> It has delineated its scope and outer limits. The judicial branch’s role is at its end. What now happens within the limits defined by the courts, or how freedom of speech is

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<sup>45</sup> *Canada (Attorney General) v Power*, [2024 SCC 26](#) at paras [48](#), [51](#); *Chagnon*, *supra* note 9 at paras [20-24](#); *Vaid*, *supra* note 9 at paras [20-21](#); *New Brunswick Broadcasting*, *supra* note 37 at [377](#), [384-385](#); *British Columbia (Attorney General) v Provincial Court Judges’ Association of British Columbia*, [2020 SCC 20](#), at paras [65-66](#).

<sup>46</sup> *Vaid*, *supra* note 9 at para [20](#).

<sup>47</sup> *Ibid* at para [29\(11\)](#); *Chagnon*, *supra* note 9 at para [32](#).

<sup>48</sup> *Ibid*.

<sup>49</sup> *Vaid*, *supra* note 9 at para [29\(9\)](#).

<sup>50</sup> *Chagnon*, *supra* note 9 at para [24](#).

<sup>51</sup> *Vaid*, *supra* note 9 at paras [29\(10\)](#), [39](#); *Duffy*, *supra* note 44 at paras [62-63](#).

applied and augmented to suit a legislative body’s needs, is up to the collective will of legislators.<sup>52</sup>

36. The notion that legislative bodies do not have the capacity to scope and limit established privileges (within the outer limits defined by the courts) except through constitutional amendment unacceptably undermines that which parliamentary privilege is designed to protect — parliament’s autonomy.<sup>53</sup> To be clear, this is distinct from a scenario where a legislative body attempts to expand its privileges. Such attempts would push the boundaries of jurisdiction between the legislative and judicial branches and be unconstitutional if they did not meet the necessity test. However, there is nothing unconstitutional about legislative bodies exercising their judgement regarding when their privileges apply — even through legislation. As discussed further below, the use of legislation is merely one vehicle by which a legislative body may choose to exercise its privileges. The form of exercise does not fundamentally alter the action itself — legislating limits on established privileges is a matter of the “occasion and manner” of the exercise of a legislative body’s privileges.<sup>54</sup>

37. A finding that constitutional amendment, regardless of the applicable amending formula, is required for legislative bodies to scope and limit their established privileges would open the door to inappropriate judicial and Crown intrusion into the legislative sphere. Such a decision would, in effect, require the courts to dictate to legislative bodies the manner in which they can exercise privileges by limiting their options for implementing *their judgement* within *their jurisdiction*. The judicial intrusion is contrary to established law and would render the protections of parliamentary privilege nugatory, as cautioned by McLachlin, J. (as she then was) in *New Brunswick Broadcasting Co v Nova Scotia (Speaker of the House of Assembly)* [*New Brunswick Broadcasting*]:

Were the courts to examine the content of particular exercises of valid privilege, and hold some of these exercises invalid, they would trump the exclusive jurisdiction of the legislative body, after having admitted that the privilege in issue falls within the exclusive jurisdiction of the legislative body. The only area for court review is at the initial

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<sup>52</sup> *Harvey v New Brunswick (Attorney General)*, [1996] 2 SCR 876 at para 60 (SCC), McLachlin J [*Harvey*].

<sup>53</sup> *Vaid*, *supra* note 9 at para 29(7); *Duffy*, *supra* note 44 at para 32.

<sup>54</sup> *Vaid*, *supra* note 9 at para 29(9).

jurisdictional level: is the privilege claimed one of those privileges necessary to the capacity of the legislature to function? A particular exercise of a necessary privilege cannot then be reviewed, unless the deference and the conclusion reached at the initial stage be rendered nugatory.<sup>55</sup>

38. Further, by requiring constitutional amendment, the courts would mandate legislative bodies to seek Crown consent in the exercise of their privileges, representing additional intrusion. This is distinct from a situation where a legislative body, in its judgement, opts to use legislation and thereby invites Crown involvement in the exercise of its privileges. As discussed in Part C below, the latter cannot logically be considered an intrusion while the former is. Additionally, if it is determined that the general constitutional amending formula is required for the federal parliament to legislatively limit and scope its own privileges within the confines established by the judiciary, this opens the door to further outside interference into matters within the legislative sphere. The autonomy of each legislative body to manage its own affairs would be set aside in favour of collaboration with external parties. Local matters would no longer be treated as local. Increased risk of “delays, disruption, uncertainties and costs which would hold up the nation’s business” would invariably result.<sup>56</sup> While Binnie J. raised these risks in *Vaid* with reference to judicial intervention into parliamentary proceedings, the same apply when requiring other outside interference into decisions respecting the exercise of a legislative body’s privileges. These are the very risks that parliamentary privilege, as a constitutional principle, is intended to guard against.

### **C. The vehicle by which to scope and limit privileges is a legislative body’s choice**

#### *i. Legislative bodies exercise, including through scoping and limiting, privileges by various vehicles*

39. A legislative body’s own privileges can be, and in fact regularly are, scoped and limited by various vehicles. These include, for example, resolutions or orders of the House, whether *ad hoc* orders in response to distinct situations or more permanent orders like the Standing Orders, and legislation. The vehicle that a legislative body selects to implement its will in exercising its

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<sup>55</sup> *New Brunswick Broadcasting*, *supra* note 37 at [384](#).

<sup>56</sup> *Vaid*, *supra* note 9 at para [20](#).

privileges does not fundamentally change the nature of the action. As above, an exercise of privilege is an exercise of privilege, whether it occurs by order/resolution or legislation.

40. The Assembly has seen fit to scope and limit its own privileges, within the outer bounds determined by the judiciary, by both resolution and legislation. With respect to freedom of speech, the Assembly has set limits by the following vehicles:

- a. Per Standing Order 25, a Member may be called to order, and subject to discipline, while participating in proceedings for various reasons including: unnecessary repetition; anticipating any matter on the Order Paper for consideration; reflecting on previous votes unless intending to move to rescind them; referring to any matter *sub judice*, that is, any matter pending before a judge or quasi-judicial body for determination where the reference would unduly prejudice the judicial or quasi-judicial proceedings; making allegations against another Member; imputing false motives to another Member; charging another Member with uttering a deliberate falsehood; using abusive or insulting language of a nature likely to create disorder; speaking disrespectfully of His Majesty or any of the Royal Family, or the Governor General, or the Administrator of Canada, or the Lieutenant Governor, or the Administrator of the Province; or introducing any matter in debate that in the opinion of the Speaker offends the practices and precedents of the House;<sup>57</sup>
- b. Members have been censured by order of the House for making comments or engaging in conduct seen by the House to be offensive. For example, former MPPs Jama and Hillier were censured in 2023 and 2022 respectively for comments made on social media; and<sup>58</sup>

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<sup>57</sup> [Standing Orders of the Legislative Assembly of Ontario](#) (January 2025), ss 25(c), (e)-(m).

<sup>58</sup> Legislative Assembly of Ontario, [Votes and Proceedings, 43-1, No 100 \(23 October 2023\)](#) at 3-4; Legislative Assembly of Ontario, [Votes and Proceedings, 42-2, No 33 \(22 February 2022\)](#) at 8. See also *Jama v The Speaker*, [2024 ONSC 1264](#), leave to appeal to ONCA refused, COA-24-OM-0169 (15 November 2024) [*Jama*], LAO BOA Tab 3, where the Divisional Court for Ontario upheld the censure of Ms. Jama as an exercise of parliamentary privilege.

- c. Per s. 41 of the *LAA*, “No member of the Assembly shall knowingly accept or receive, either directly or indirectly, any fee, compensation or reward for or in respect of the drafting, advising upon, revising, *promoting or opposing any bill, resolution, matter or thing submitted or intended to be submitted to the Assembly or a committee thereof.*”<sup>59</sup> [emphasis added].

Section 41 is an express exception to s. 53 of the *LAA*, which states that “Except so far as is provided by section 41, nothing in this Act shall be construed to deprive the Assembly or a committee or member thereof of any right, immunity, privilege or power that the Assembly, committee or member might otherwise have been entitled to exercise or enjoy.”<sup>60</sup> As such, s. 41 is a legislated limitation on the privileges of the Assembly exercisable by Members.

Anyone in contravention of s. 41 of the *LAA* “is liable to a penalty equal to the amount or value of the fee, compensation or reward the person accepted or received and the sum of \$500.”<sup>61</sup>

41. Each example above merely represents a different implementation of the Assembly’s same intention: to manage its deliberative proceedings according to the Members’ collective will by setting boundaries on freedom of speech agreed to by the majority. In *Ontario (Speaker of the Legislative Assembly) v Ontario (Human Rights Commission)* [*Legislative Prayers Case*], the Court of Appeal for Ontario confirmed that the Assembly’s ability to make rules for its proper functioning through the Standing Orders is protected by parliamentary privilege. The Court stated that:

I consider it well established that the Assembly must be afforded privilege over its own internal affairs and day-to-day proceedings and that this privilege includes the setting of rules such as the Standing Orders to provide for the proper functioning of the Assembly. That is, matters relating to the internal workings of the House must be subject to the exclusive jurisdiction of the House, since control over such matters is necessary to the independent existence of the House. The House must be absolutely free to set its own

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<sup>59</sup> *LAA*, *supra* note 3, [s 41](#).

<sup>60</sup> *Ibid*, [s 53](#).

<sup>61</sup> *Ibid*, [s 43](#).

guidelines for how its legislative sessions will be carried out and the Standing Orders that detail the operation of parliamentary procedure must be considered privileged and insulated from outside review.<sup>62</sup>

42. In the same vein, the Divisional Court for Ontario recently upheld the Assembly's right to censure Members for statements deemed offensive to the House by way of resolution as an exercise of its disciplinary authority and control over its proceedings.<sup>63</sup> It would be a peculiar result for the law to acknowledge and protect Standing Orders and orders/resolutions of the House as exercises of parliamentary privilege, while requiring constitutional amendment for legislation that serves the same purpose. Surely, a difference in the mere manner and form by which a legislative body chooses to regulate matters within its jurisdiction cannot be the determining factor that attracts judicial interference.

43. In her concurring opinion in *Harvey v New Brunswick (Attorney General)* [*Harvey*], McLachlin J. (as she then was) was alive to the fact that legislative bodies have options with respect to the manner in which they exercise privileges. In speaking of legislative bodies' inherent authority to discipline or exclude members, she noted that:

Expulsion and disqualification for corruption could be left to be dealt with as the need arises. However, the Canadian Parliament and the legislatures of Canada have thought it better to set out rules in legislative form. They have passed statutes like the *New Brunswick Elections Act* which spell out what will happen if, for example, a candidate is convicted of corrupt electoral practices. These statutes impose sanctions not only of expulsion, but also of disqualification so as to preclude the ejected member from sterilizing the disciplinary process by immediately standing for re-election and re-entering the legislative assembly.<sup>64</sup>

44. The circumstances in *Harvey* were similar to those in the case at bar in that the Legislative Assembly of New Brunswick opted to exercise its privilege over disciplinary authority of members engaging in corrupt conduct through legislation as opposed to *ad hoc* resolutions or orders. McLachlin J. concluded that s. 119(c) of the *New Brunswick Elections Act* was valid legislation and that the disqualification of the member in question was a legitimate

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<sup>62</sup> *Legislative Prayers Case*, *supra* note 17 at para [48](#).

<sup>63</sup> *Jama*, *supra* note 58 at para [64-65](#).

<sup>64</sup> *Harvey*, *supra* note 52 at para [63](#).

exercise of parliamentary privilege.<sup>65</sup> In doing so, McLachlin J. appeared to accept that the form of the Legislative Assembly of New Brunswick's exercise of its privilege did not change the character of its action. Further, in examining whether the necessity test ought to apply given that the privilege was legislated in *Harvey*, McLachlin J. stated that, "There is much to recommend such an extension of the necessity doctrine in Canada, and little to justify a distinction between privilege claimed by resolution and privilege claimed by legislation."<sup>66</sup> Justice McLachlin's statement acknowledges that there is little functional difference between the vehicles by which legislative bodies manage their privileges — whether by resolution or legislation, an exercise of privilege does not lose its essential character.

45. The Court of Appeal for Ontario has espoused a similar view. In discussing the establishment of procedures for the appropriate functioning of the Assembly in the *Legislative Prayers Case*, the Court of Appeal stated that, "Accordingly, if rules of order are determined to be necessary to the capacity of the Legislature to function, ***their form and content are solely matters within the exclusive and absolute jurisdiction of the Legislature*** [emphasis added]."<sup>67</sup> The approaches of McLachlin J. and the Court of Appeal, which favour substance over form, acknowledge that a legislative body's will may be implemented by various methods. This is the appropriate framework to apply when examining exercises of parliamentary privilege to give full effect to legislative bodies' autonomy over matters necessary to their ability to exercise their constitutional functions with dignity and efficiency.

46. It is true that legislation is distinct from resolutions and orders of the House in that the latter are exercisable by a legislative body acting alone while the former requires Crown involvement to effect Royal Assent (or that of the other House in the case of the federal parliament). As such, arguments can be made that the enactment of legislation involves the kind of outside interference that parliamentary privilege is intended to guard against. However, this fails to account for the fact that it is open to a legislative body to elect to use more onerous vehicles in managing its privileges when it determines, in its judgment, that the circumstances so require. For example, the Assembly may, for certain matters, opt to pursue legislation to exercise

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<sup>65</sup> *Harvey*, *supra* note 52 at paras [88-89](#).

<sup>66</sup> *Ibid* at para [73](#).

<sup>67</sup> *Legislative Prayers Case*, *supra* note 17 at para [26](#).

its privileges because it is procedurally more difficult to amend a statute (which requires three readings and Royal Assent) as opposed to an Order of the House (which only requires notice and a majority vote). As the Court of Appeal for Ontario alluded to in the decision below, there is a fundamental difference between efforts by outside parties seeking to limit the scope of an asserted privilege and a legislative body doing the same for itself, with or without outside assistance—only the former can logically be classified as interference.<sup>68</sup>

*ii. Eliminating ordinary legislation as a vehicle by which to exercise privilege jeopardizes existing exercises of privilege beyond the federal level*

47. A determination by this Court that constitutional amendment is required for federal parliament to scope and limit its established privileges by legislation has broad implications and calls into question existing enactments by the Assembly.

48. Although the constitutional status of inherent versus legislated privileges is a settled matter, with this Court confirming that both are of a constitutional nature, it bears note that all of the Assembly’s privileges, as well as those of all provincial legislatures, are inherent, flowing through the *Constitution Act, 1867*.<sup>69</sup>

49. While an assertion that inherent privileges can only be scoped by constitutional amendment may not implicate all of federal parliament’s privileges, given federal parliament’s express authority to legislate its privileges by virtue of s. 18 of the *Constitution Act, 1867*, it does implicate all of the Assembly’s privileges. A determination by this Court that constitutional amendment is required to scope and limit established privileges by legislation calls into question all of the Assembly’s legislative enactments in respect of its privileges.

50. Such a determination, first and foremost, raises questions about the validity of s. 41 of the LAA above. However, other enactments may be implicated. For example, in *Marin v Office of the Ombudsman*, the Ontario Superior Court of Justice confirmed that the Assembly’s “hiring of, management of and decision not to reappoint a parliamentary officer whose role relates to the Assembly’s work in holding government to account for the conduct of the province’s business”

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<sup>68</sup> *Alford*, *supra* note 1 at para [48](#).

<sup>69</sup> *Vaid*, *supra* note 9 at paras [29\(3\)](#), [33-34](#); *New Brunswick Broadcasting*, *supra* note 37 at [375](#); *Chagnon*, *supra* note 9 at para [18](#).

was protected by parliamentary privilege.<sup>70</sup> This means that these matters are part of the Assembly’s inherent privileges. However, through ss. 2 – 7.4 of the *Ombudsman Act*, the Assembly has legislated standards with respect to the appointment and dismissal of the Ombudsman.<sup>71</sup> It has, in effect, scoped and limited its privileges by setting limits to the term of appointment for the Ombudsman and permitting removal of the Ombudsman only for cause.<sup>72</sup> The same situation exists for all of the statutory parliamentary officers that assist the Assembly in holding the government to account — the Information and Privacy Commissioner, Auditor General, Financial Accountability Officer, Chief Electoral Officer, and Integrity Commissioner.<sup>73</sup> The outcome of this case may raise questions as to the validity of the relevant provisions of the governing statutes for each of the Assembly’s statutory parliamentary officers.

51. In *Roberts v Northwest Territories (Commissioner)*, the Supreme Court of the Northwest Territories held that the Legislative Assembly of the Northwest Territories (the “**NWT Assembly**”) bound itself when it codified matters related to the appointment and dismissal of a statutory parliamentary officer in statute.<sup>74</sup> The Court stated, “The Legislative Assembly imposed on itself, through the statute, limitations on interference with the tenure of the Conflict Commissioner. Regardless of whether the members have confidence in the person holding the office, the only basis for removal is cause or incapacity.”<sup>75</sup> It concluded that the decision of the NWT Assembly to remove the Conflict Commissioner not in accordance with statute was not covered by parliamentary privilege.<sup>76</sup> The NWT Assembly circumscribed its privileges by statute and was bound by this decision. No question was raised as to the validity of the circumscribing

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<sup>70</sup> *Marin v Office of the Ombudsman*, [2017 ONSC 1687](#) at para [72](#).

<sup>71</sup> *Ombudsman Act*, [RSO 1990, c O.6](#), ss [2](#) (appointment), [3](#) (term), [4](#) (suspension/removal), [5](#) (salary/benefits), [6](#) (designation for absence); [7](#) (temporary Ombudsman), [7.1](#) (subsequent appointment), [7.2](#) (restrictions re other work), [7.3](#) (oath of office/secretcy), [7.4](#) (nature of office-fixed term).

<sup>72</sup> *Ibid*, ss [3-4](#).

<sup>73</sup> *Freedom of Information and Protection of Privacy Act*, [RSO 1990, c F.31](#), ss [4-7.6](#); *Auditor General Act*, [RSO 1990, c A.35](#), ss [2, 4-5.7](#); *Financial Accountability Officer Act, 2013*, [SO 2013, c 4](#), ss [2-4.7](#); *Election Act*, [RSO 1990, c E.6](#), ss [3.1, 3.3-3.11](#); *Members' Integrity Act, 1994*, [SO 1994, c 38](#), ss [23-23.9](#).

<sup>74</sup> *Roberts v Northwest Territories (Commissioner)*, [2002 NWTSC 68](#).

<sup>75</sup> *Ibid* at para [64](#).

<sup>76</sup> *Ibid* at para [8](#).

legislation, just as no question has yet been raised regarding the validity of the Assembly's enactments above circumscribing its own privileges.

52. Provincial assemblies have, thus far, been able to exercise their privileges in any manner, and using any form, as deemed fit. A determination by this Court that constitutional amendment is required to legislatively scope and limit established privileges will call into question legislative enactments like the Assembly's above, as well as raise concerns as to the validity of vehicles like the Standing Orders and resolutions that achieve the same goals as legislation and are currently protected by privilege. This is because little distinguishes an exercise of privilege through order/resolution versus legislation in substance. From the Speaker's perspective, such a drastic shift in the law would cause uncertainty that would negatively impact the Assembly's ability to carry out its functions, as doubt would be cast on the instruments governing its procedures. Such implications should be considered by this Court when deciding the issues in this case.

#### **PART IV – SUBMISSIONS ON COSTS**

53. The Speaker does not seek costs and asks that costs not be awarded against her.

#### **PART V – ORDER REQUESTED**

54. The Speaker takes no position on the disposition of the appeal.

#### **PART VI – SUBMISSIONS ON PUBLICATION**

55. N/A.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 25th day of June, 2025.

Per:

*William Wong Gabriela Dedelli*

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**Wai Lam (William) Wong**

**Gabriela Dedelli**

Counsels for the Intervener,  
Speaker of the Legislative Assembly of  
Ontario

## PART VII – AUTHORITIES

### Caselaw

No.	Authority	Paragraph Reference
1.	<i>Ainsworth Lumber Co v Canada (AG) and Paul Martin</i> , <a href="#">2003 BCCA 239</a>	20
2.	<i>Alford v Canada (Attorney General)</i> , <a href="#">2024 ONCA 306</a>	1, 46
3.	<i>British Columbia (Attorney General) v Provincial Court Judges' Association of British Columbia</i> , <a href="#">2020 SCC 20</a>	32
4.	<i>Canada (Attorney General) v Power</i> , <a href="#">2024 SCC 26</a>	32
5.	<i>Canada (Deputy Commissioner, Royal Canadian Mounted Police) v Canada (Commissioner, Royal Canadian Mounted Police)</i> , <a href="#">2007 FC 564</a>	29
6.	<i>Canada (House of Commons) v Vaid</i> , <a href="#">2005 SCC 30</a>	11, 16, 30, 31, 32, 33, 34, 35, 36, 38, 48
7.	<i>Chagnon v Syndicat de la fonction publique et parapublique du Québec</i> , <a href="#">2018 SCC 39</a>	11, 18, 31, 32, 33, 34, 48
8.	<i>Duffy v Canada (Senate)</i> , <a href="#">2020 ONCA 536</a>	32, 35, 36
9.	<i>Gagliano v Canada (AG)</i> , <a href="#">2005 FC 576</a> , aff'd <a href="#">2006 FCA 86</a>	29
10.	<i>Guergis v Novak et al</i> , <a href="#">2022 ONSC 3829</a>	29
11.	<i>Harvey v New Brunswick (Attorney General)</i> , <a href="#">[1996] 2 SCR 876</a>	35, 43, 44
12.	<i>Jama v The Speaker</i> , <a href="#">2024 ONSC 1264</a> , leave to appeal to the ONCA refused, COA-24-OM-0169 (15 November 2024)	40, 42
13.	<i>Laurentian University of Sudbury</i> , <a href="#">2022 ONSC 429</a>	8
14.	<i>Marin v Office of the Ombudsman</i> , <a href="#">2017 ONSC 1687</a>	50
15.	<i>Morin v Crawford</i> , <a href="#">1999 CanLII 6802</a>	28
16.	<i>New Brunswick Broadcasting Co v Nova Scotia (Speaker of the House of Assembly)</i> , <a href="#">[1993] 1 SCR 319</a>	28, 30, 32, 37, 48

No.	Authority	Paragraph Reference
17.	<i>Ontario (Premier) v Canada (Commissioner of the Public Order Emergency Commission)</i> , <a href="#">2022 FC 1513</a>	20
18.	<i>Ontario (Speaker of the Legislative Assembly) v Casselman</i> , [1996] OJ No 5343	24
19.	<i>Ontario (Speaker of the Legislative Assembly) v Ontario (Human Rights Commission)</i> (2001), <a href="#">54 OR (3d) 595</a> , aff'd (2000), <a href="#">196 DLR (4th) 136</a>	17, 28, 41, 45
20.	<i>Ontario v Rothmans Inc.</i> , <a href="#">2014 ONSC 3382</a>	31
21.	<i>Roberts v Northwest Territories (Commissioner)</i> , <a href="#">2002 NWTSC 68</a>	51
22.	<i>Roman Corp v Hudson's Bay Oil &amp; Gas Co.</i> , <a href="#">[1972] 1 OR 444</a> , aff'd <a href="#">[1973] SCR 820</a>	27
23.	<i>Samson Indian Nation and Band v Canada (FC)</i> , <a href="#">2003 FC 975</a>	20
24.	<i>Telezone Inc v Canada (Attorney General)</i> (2004), <a href="#">69 OR (3d) 161</a>	20

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No.	Secondary Source	Paragraph Reference
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2.	<a href="#">Erskine May's Treatise on the Law, Privileges, Proceedings and Usage of Parliament, 25th ed</a> , by David Natzler and Mark Hutton, eds (London: LexisNexis, 2019)	19
3.	<a href="#">House of Commons Procedure and Practice, 3rd ed</a> , by Robert Marleau and Camille Montpetit, eds (Ottawa: House of Commons, 2017)	17, 19, 20, 23, 29, 31
4.	J P Joseph Maingot, <i>Parliamentary Immunity in Canada</i> (Toronto: LexisNexis Canada Inc, 2016)	9, 17, 24, 25, 26, 28

No.	Secondary Source	Paragraph Reference
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No.	Statute, Regulation, Rule, etc.	Paragraph Reference
1.	<i>Auditor General Act</i> , <a href="#">RSO 1990, c A.35</a>	50
	<i>vérificateur général (Loi sur le)</i> , <a href="#">LRO 1990, chap A.35</a>	50
2.	<i>Bill of Rights, 1689</i> (UK), <a href="#">[1688] 1 Will &amp; Mar (2nd Sess), c 2</a>	28
3.	<i>Constitution Act, 1867</i> (UK), <a href="#">30 &amp; 31 Vict, c 3</a>	1, 7, 9, 10
	<i>Loi constitutionnelle de 1867</i> , <a href="#">30 &amp; 31 Victoria, c 3</a>	1, 7, 9, 10
4.	<i>Election Act</i> , <a href="#">RSO 1990, c E.6</a>	50
	<i>électorale (Loi)</i> , <a href="#">LRO 1990, chap E.6</a>	50
5.	<i>Financial Accountability Officer Act, 2013</i> , <a href="#">SO 2013, c 4</a>	50
	<i>directeur de la responsabilité financière (Loi de 2013 sur le)</i> , <a href="#">LO 2013, chap 4</a>	50
6.	<i>Freedom of Information and Protection of Privacy Act</i> , <a href="#">RSO 1990, c F.31</a>	50
	<i>accès à l'information et la protection de la vie privée (Loi sur l')</i> , <a href="#">LRO 1990, chap F.31</a>	50
7.	<i>Legislative Assembly Act</i> , <a href="#">RSO 1990, c L.10</a>	2, 12, 13, 20, 40
	<i>Assemblée législative (Loi sur l')</i> , <a href="#">LRO 1990, chap L.10</a>	2, 12, 13, 20, 40
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	<i>intégrité des députés (Loi de 1994 sur l')</i> , <a href="#">LO 1994, chap 38</a>	50

No.	Statute, Regulation, Rule, etc.	Paragraph Reference
9.	<i>National Security and Intelligence Committee of Parliamentarians Act</i> , <a href="#">SC 2017, c 15</a>	1
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10.	<i>Ombudsman Act</i> , <a href="#">RSO 1990, c O.6</a>	50
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3.	Legislative Assembly of Ontario, <i>Official Report of Debates (Hansard)</i> , <a href="#">40-1, No 33 (03 April 2012)</a>	23
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7.	Legislative Assembly of Ontario, <i>Votes and Proceedings</i> , <a href="#">42-2, No 33 (22 February 2022)</a>	40
8.	Legislative Assembly of Ontario, <i>Votes and Proceedings</i> , <a href="#">43-1, No 100 (23 October 2023)</a>	40
9.	<i>Standing Orders of the Legislative Assembly of Ontario</i> (January 2025)	40