SCC Court File No. 38585

IN THE SUPREME COURT OF CANADA

(ON APPEAL FROM THE COURT OF APPEAL FOR ONTARIO)

B E T W E E N :

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APPELLANT
(Respondent)

- and -

G.

RESPONDENT
(Appellant)

- and -

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PART I: OVERVIEW AND POSITION ON QUESTIONS ON APPEAL

1. At the very moment the criminal law loses its authority over a person found not criminally responsible by reason of mental disorder ("NCR") of a sexual offence,[1] that individual becomes subject to the reporting requirements of the provincial Sex Offender Registry ("*Christopher's Law*"). People found NCR of designated offences—individuals with serious mental disorders who have long been stereotyped as dangerous and unpredictable—are automatically placed on the registry without any means of considering their individual circumstances. The registry provides no mechanism for exemption or removal. In circumstances like the Respondent's, the law requires compliance for life. Conversely, exit ramps for morally guilty sexual offenders are built into *Christopher's Law*. Those found guilty of sexual offences are exempt from registration if they receive a discharge under s. 730 of the *Criminal Code*, and are automatically removed from the registry's reporting requirements if they receive a pardon or a record suspension.

2. The CLA submits that the Court of Appeal properly concluded that *Christopher's Law* violates s. 15 of the *Charter* in two ways. First, by failing to provide any mechanism for the exemption or removal of NCR persons from the registry, the legislation has a harsher effect on NCR persons than offenders found guilty of designated offences. Second, the legislation fails to fulfill the promise of s. 15 for substantive equality, which demands that NCR persons be treated differently than guilty offenders in a manner that responds to their unique needs and status in the eyes of the criminal law.

3. With respect to remedy, the CLA submits that it is time to revisit when it is appropriate to combine suspended declarations of invalidity with individual relief for the successful claimant. The circumstances in which declarations of invalidity are suspended have broadened considerably since the remedy's inception. Rather than reserving individual remedies during suspended periods of invalidity for unusual cases, courts should be able to craft remedies for immediate and effective relief for successful *Charter* claimants, so long as it is not contrary to the public interest.

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[1] *Winko v. British Columbia (Forensic Psychiatric Institute)*, [1999] 2 S.C.R. 625, at para. 47.

PART II: STATEMENT OF ARGUMENT

A. *Christopher's Law* discriminates against absolutely discharged NCR persons

i) Christopher's Law *provides exemption and removal mechanisms to convicted sex offenders who receive pardons or record suspensions that are not provided to absolutely discharged NCR persons*

4. *Christopher's Law* distinguishes guilty offenders from NCR persons in a manner that perpetuates the disadvantages that face persons with mental illnesses.[2] A person found NCR of two very minor sexual offences, committed during an acute mental health crisis, is subject to the requirements of *Christopher's Law* for life.[3] A mentally well sex offender who committed nearly identical designated offences, and presents a similar risk of recidivism from a statistical point of view, will never be placed on the registry if he receives a discharge under s. 730 of the *Code*. Upon receiving a pardon or record suspension, he will automatically be exempt from the reporting conditions in *Christopher's Law*.[4] The end result of the legislation is that NCR persons are left worse off, and subject to longer monitoring under *Christopher's Law*, by virtue of their mental disorders.

5. The Appellant relies on the "empirical fact" that persons found NCR for sexual offences are at a greater risk to commit another sexual offence *as compared to persons with no history of offending behaviour*.[5] But persons with no history of offending behaviour are not at risk of being placed on the provincial sex offender registry. The relevant comparison for s. 15 purposes must be to convicted sex offenders. The fact that the risk of recidivism is statistically similar for convicted and NCR persons, and cannot be determined with certainty on an individual basis, does not explain the differential treatment between these two groups.[6] If both groups present with an equivalent risk of recidivism by virtue of having committed a designated offence, s. 15 demands that restrictions on liberty and administrative burdens intended to protect the public be applied equitably to both groups. They are not.

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[2] *Kahkewistahaw First Nation v. Taypotat*, 2015 SCC 30, at paras. 19-20; *Withler v. Canada (Attorney General)*, 2011 SCC 12, at para. 30; *Winko*, *supra*, at paras. 77-80.
[3] *Christopher's Law (Sex Offender Registry)*, 2000, S.O. 2000, c. 1, s. 7(1).
[4] *Ibid*, ss. 3, 7(4).
[5] See Appellant's Factum, at paras. 3, 20-23, 57-58.
[6] See Appellant's Factum, at paras. 2-3, 20-25, 58.

6. The only legally relevant distinction between those convicted of sexual offences and those found NCR is that those in the latter group "suffer from a mental disorder that rendered them incapable of appreciating the nature and quality of their acts, or knowing that those acts were wrong."[7] The differential treatment widens the gap between NCR persons and the rest of society, by perpetuating the stereotype that persons with mental illnesses are inherently, and indefinitely, dangerous.[8]

ii) Section 15's promise of substantive equality requires providing absolutely discharged NCR persons access to individualized assessment

7. The second way in which *Christopher's Law* is discriminatory is perhaps less obvious, but more fundamental. Section 15 guarantees *substantive* equality. This guarantee recognizes that "identical treatment may frequently produce serious inequality"[9] and differential treatment may be required to "ameliorate the actual situation of the claimant group."[10] The Court of Appeal properly concluded that substantive equality requires providing NCR persons who have been absolutely discharged access to some form of individualized assessment as a precondition to their placement or maintenance on a sex offender registry.[11]

8. The s. 15 complaint here is not that those found NCR are not treated *"in exactly the same way"* as those found guilty of sexual offences, as the Appellant suggests.[12] Rather, the claim is that the legislation fails to respond to the unique needs and circumstances of people found NCR and therefore fails to fulfill s. 15's promise for equitable treatment. There is nothing novel about compliance with s. 15 requiring an individualized approach to a claimant group. To the contrary, individualized treatment that responds to a claimant group's actual situation is the hallmark of substantive equality and the "antithesis of the logic of stereotype."[13] When legislation fails to take into account a claimant group's actual needs and circumstances, it is more vulnerable to a

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[7] *G. v. Ontario (Attorney General)*, 2019 ONCA 264, at para. 115.
[8] *Ibid* at para. 122; *Quebec (Attorney General) v. A.*, 2013 SCC 5, at para. 332.
[9] *Taypotat*, *supra*, at para. 17.
[10] *Withler*, *supra*, at para. 39.
[11] *G.*, *supra*, at para. 127.
[12] See Appellant's Factum, at paras. 55-57.
[13] *Winko*, *supra*, at para. 88.

s. 15 challenge.[14] As Justice Sopinka held, "[i]t is recognition of the actual characteristics, and reasonable accommodation of these characteristics, which is the central purpose of s. 15(1)."[15]

9. This is one reason why the Appellant's argument that if the exemption for pardoned offenders "were truly a constitutional flaw in *Christopher's Law*, it could be cured by removing that exemption," must fail. Treating sex offenders and NCR persons in the exact same way would be inequitable. Categorical intrusions on liberty interests based on statistical data—with no allowance for an individualized assessment—discriminate against those found NCR in a way they do not against sexual offenders. They perpetuate the stereotype that mentally disordered people are inherently dangerous, and thereby exacerbate the disadvantages they face in society.

10. The belief that individuals with mental disorders should be subject to ongoing state monitoring to protect the public from the perceived danger they pose is inconsistent with this Court's holding in *Winko v. British Columbia* that "the threshold triggering the preventive jurisdiction of criminal law over the NCR accused is the existence of a threat to the safety of the public."[16] The analysis in *Winko* concerning the special place that NCR persons occupy in the criminal law sheds light on what is required to achieve substantive equality. The fact the registry presents a more modest impact on liberty than the orders of a provincial review board does not render *Winko* inapplicable.[17] The Appellant's submission in this regard fails to acknowledge the differential impact of registration and reporting on mentally disordered offenders.[18] In any event, modest burdens must be distributed as equitably as severe incursions into liberty.

11. To be applied fairly, the criminal law, including ancillary orders like sex offender registries, must be responsive to the lack of culpability of NCR persons, the deeply embedded

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[14] See *Law v. Canada (Minister of Employment and Immigration)*, [1999] 1 S.C.R. 497, at para. 70. The converse is also true: when legislation does take into account a claimant's or claimant group's individual needs and circumstances, establishing a s. 15 violation will be more difficult: *Thompson and Empowerment Council v. Ontario*, 2013 ONSC 5392, at para. 125 (aff'd: 2016 ONCA 676, see paras. 66-67).

[15] *Eaton v. Brant County Board of Education*, [1997] 1 S.C.R. 241, at para. 67

[16] *Winko*, *supra*, at para. 103.

[17] See Appellant's Factum, at para. 48.

[18] *G.*, *supra*, at paras. 134-135.

societal prejudices they face, and the ultimate goals of their treatment and reintegration. The mandatory inclusion on the provincial sex offender registry of those found NCR, without the possibility of removal *even where lack of risk can be established* fails to fulfill the mandate of s. 15 for substantive equality. Instead, the legislation perpetuates the stereotype that all mentally ill persons are inherently dangerous—forever.

B. The discriminatory effect of *Christopher's Law* is a result of legislative decision-making

12. The discriminatory effect of *Christopher's Law* is the result of a legislative choice, not the inevitable consequence of the language the *Criminal Records Act* or s. 730 of the *Criminal Code.* To be sure, the unavailability of a s. 730 discharge for those found NCR is the result of never being found guilty of an offence. And the unavailability of a pardon for NCR persons is a result of the *Criminal Records Act*, or more accurately, a function of not having been convicted of an offence. But the unavailability of any process for NCR persons to apply for an exemption or removal from the registry and its reporting requirements is the result of the provisions of *Christopher's Law*.

13. The provincial government chose to create exemption and removal mechanisms for morally culpable sex offenders and to link those mechanisms to s. 730 discharges, and pardons and record suspensions under the *Criminal Records Act*. The law makers also decided that no comparable mechanism would be available to those found NCR of sexual offences.

14. Moreover, the legislative decision not to place morally culpable sex offenders on the registry when they are discharged, and to remove them from the reporting requirements when they receive a pardon or record suspension, is not based on "informed statistical generalization[s]".[19] There does not appear to have been any evidence on the risk of recidivism of those discharged under s. 730 of the *Code* and research on the connection between pardons

[19] See Appellant's Factum, at paras. 43, 48.

and record suspensions and risk level is thin.[20] Nevertheless, the provincial government decided that for some sexual offenders, there is insufficient public interest to place them on the registry in the first place, and that sexual offenders who obtain a pardon or record suspension need no longer report. The provision of exit ramps to convicted sex offenders, but not to NCR persons who have been absolutely discharged, sends a clear discriminatory message: NCR persons are inherently dangerous and incapable of rehabilitation.

15. The Appellant's claim that *Christopher's Law* exempts convicted sex offenders who have received pardons or record suspensions from the registry to avoid any potential conflict with federal legislation must fail for two reasons.[21] First, the wording of the *Criminal Records Act* makes clear that pardons and record suspensions are intended to remove obligations imposed by federal—not provincial—legislation.[22] This helps to explain why Ontario's *Highway Traffic Act* includes a provision that the *Act* and its regulations apply to those who have received a pardon in the same manner as if they had not received a pardon.[23]

16. Second, assuming there is a real concern about conflict, the Province is not entitled or required to protect against a challenge by pardoned sexual offenders by treating NCR persons in a discriminatory manner. Avoiding potential conflict with federal legislation does not relieve the province of its duty to ensure its legislation operates in a *Charter*-compliant manner. The Appellant has provided no reason why its legislation cannot be both consistent with federal legislation and non-discriminatory.

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[20] See Appellant's Factum, at para. 24. Indeed, the evidence of Dr. Hanson was that the recidivism rate for pardoned offenders is "clearly higher" than the base rate in the general population.

[21] See Appellant's Factum, at para. 55.

[22] R.S.C. 1985, c. C-47, s. 2.3; and *R. v. R.Z.*, 2016 ONCJ 438, [2016] O.J. No. 3835, at paras. 22, 32.

[23] R.S.O. 1990, c. H.8, s. 1(6).

C. Courts should be free to fashion immediate and effective individual remedies for claimants during suspended periods of invalidity

i) The threshold for suspending a declaration of invalidity has evolved since the remedy's inception

17. Since the inception of the suspended declaration of invalidity, the circumstances in which such a remedy is granted have greatly expanded. So too, the CLA submits, must the circumstances in which courts may fashion individual remedies for *Charter* claimants to receive immediate and effective relief during the period of the suspension.

18. Suspended declarations of invalidity were introduced to Canadian law for the purpose of averting "chaos and anarchy." [24] In 1985, in *Re Manitoba Language Rights*, this Court held that all unilingual Acts of the Manitoba legislature were unconstitutional, but allowed those laws to temporarily remain in effect as the "Constitution will not suffer a province without laws."[25] Seven years later, in *Schachter v. Canada*[26], Lamer C.J.C. identified three scenarios in which suspended declarations of invalidity were appropriate: where immediate invalidity would 1) pose a danger to the public, 2) threaten the rule of law, or 3) result in the deprivation of existing benefits to deserving individuals. The Court specifically cautioned specifically *against* consideration of "the role of the courts and the legislature" in issuing a suspended declaration. [27]

19. In the years since *Schachter*, this Court has consistently, and recently, reiterated the "high standard" required to justify suspending a declaration of invalidity. Yet a review of the circumstances in which suspensions are granted reveals that they are not limited to situations where immediate invalidation would "pose a danger to the public or imperil the rule of law."[28] In granting suspensions, courts (including the Court of Appeal in this case) commonly rely on the

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[24] *Re Manitoba Language Rights*, [1985] 1 S.C.R. 721 at 758.
[25] *Ibid* at 766-767.
[26] [1992] 2 S.C.R. 679. *Schachter* was released after this Court's decision in *R. v. Swain*, [1991] 1 S.C.R. 933. In *Swain*, a majority of this Court suspended the declaration of invalidity as an immediate declaration would compel judges to release all "insanity acquitees" into the community, including those who may pose a danger to the public.
[27] *Schachter*, *supra*, at 717-719.
[28] *R. v. Boudreault*, 2018 SCC 58, at para. 98.

need to allow the government to amend legislation as it sees fit.[29] In *Charter* litigation involving the nullification of an unconstitutional law, it seems declarations of invalidity are now suspended in more cases than not.[30] Such cases include those where an immediate declaration of invalidity would result in financial consequences to the government[31], or raise practical difficulties for the government.[32] Declarations have similarly been suspended where the legislative provisions raised constitutional concerns beyond those at issue in the litigation, to allow the government sufficient time to bring the provisions into compliance with the *Charter*[33]; and where moving from a regulated to an unregulated sphere would be a matter of great concern to many Canadians, even where danger to the public or to the rule of law was not established.[34]

20. As the circumstances in which suspensions are issued evolves, so too must the law in respect of combining s. 52 and s. 24(1) remedies. Where a declaration of invalidity is suspended so as to not constrain government discretion in crafting a constitutionally compliant solution (rather than to preserve the rule of law or prevent a serious risk to public safety), there is no compelling justification to continue to deprive a successful claimant of their *Charter* rights during the period of the suspension. A delayed declaration "allows a state of affairs which has been found to violate standards embodied in the *Charter* to persist for a time despite the violation."[35] In the absence of a personal remedy, this means a rights claimant continues to bear the burden of the *Charter* violation. Immediate personal relief during a period of suspended

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[29] *G.*, *supra*, at para. 150. See also: *Dunmore v. Ontario (Attorney General)*, 2001 SCC 94, at para. 66; *Figueroa v. Canada (Attorney General)*, 2003 SCC 37, at para. 93; *Health Services and Support – Facilities Subsector Bargaining Assn. v. British Columbia*, 2007 SCC 27, at para. 168.

[30] Between 2003 and 2011, this Court issued a suspended declaration of invalidity in 8 of the 11 cases (73 percent): G. R. Hoole, "Proportionality as a Remedial Principle: A Framework for Suspended Declarations of Invalidity in Canadian Constitutional Law" (2011), 49 Alta. L. Rev. 107 at paras. 15-16. [Book of Authorities ("*BOA")*, Tab 2]

[31] *Re Eurig Estate*, [1998] 2 S.C.R. 565, at 586; *Confédération des syndicats nationaux v. Canada (Attorney General)*, 2008 SCC 68, at para. 94.

[32] *Nguyen v. Quebec (Education, Recreation and Sports)*, 2009 SCC 47, at para. 46.

[33] *R. v. Tse*, 2012 SCC 16 at paras. 11, 101-102.

[34] *Canada (Attorney General) v. Bedford*, 2013 SCC 72, at paras. 166-169. See also *Carter v. Canada (Attorney General)*, 2015 SCC 5, where this Court suspended the declaration of invalidity to allow the government to craft a complex regulatory regime: paras. 125, 128.

[35] *Schachter*, *supra*, at 716.

invalidity should not be limited to "unusual cases."[36] Instead, an individual remedy should be granted where it is necessary for effective relief and not contrary to the public interest.

ii) This Court's jurisprudence allows for broadening the circumstances in which individual remedies are combined with s. 52 declarations of invalidity

21. This Court's decision in *R. v. Demers* should not be read as overruling the earlier ruling in *Corbiere v. Canada*, where the Court held that, in general, litigants who have made *Charter* challenges should receive the immediate benefits of the ruling, even if the effect of the declaration is suspended.[37] Neither *Schachter* nor this Court's later decision in *R. v. Ferguson* foreclose the possibility of combining remedies pursuant to ss. 24(1) and 52(1). Nor did they foreclose the possibility of courts fashioning other remedies for rights-claimants.[38] Indeed, Lamer C.J.C., having found in dissent in *Rodriquez v. British Columbia* that the prohibition against physician-assisted suicide violated the *Charter*, concluded that the appropriate remedy was a suspended declaration combined with an exemption for Ms. Rodriquez and other similarly situated individuals.[39] Such a combined remedy does not raise the same concerns as a *freestanding* constitutional exemption.[40] Interim constitutional exemptions, that survive only as long as a suspension period, do not create uncertainty or undermine the rule of law. When the suspension expires so too does the exemption, and the constitutional solution—whether new legislation or a declaration of invalidity—applies universally.[41]

22. This Court has repeatedly affirmed the ability of courts to craft meaningful remedies during periods where a declaration of invalidity is suspended. In *R. v. Swain*, this Court crafted a transitional regime that capped detentions ordered under s. 542(2) to 30 days, or 60 days where the Crown established necessity.[42] In *Nguyen v. Quebec*, the Court tailored immediate remedies

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[36] See *R. v. Ferguson*, 2008 SCC 6, at para. 63.
[37] *Corbiere v. Canada (Minister of Indian and Northern Affairs)*, [1999] 2 S.C.R. 203, at paras. 23, 122. See also *R. v. Mernagh*, 2011 ONSC 2121, at para. 343 (rev'd on other grounds, 2013 ONCA 67); and *R. v. Parker* (2000), 146 C.C.C. (3d) 193 (Ont. C.A.), at para. 11.
[38] *Schachter*, *supra*, at 720; *Ferguson*, *supra*, at para. 63.
[39] *Rodriguez v. British Columbia (Attorney General)*, [1993] 3 S.C.R. 519, at 571-581.
[40] *Ferguson*, *supra*, at paras. 37, 46-47; *Carter* (2015), *supra*, at paras. 124-125.
[41] C. Mouland, "Remedying the Remedy: Bedford's Suspended Declaration of Invalidity" (2018) 41:3 Man. L.J. 281 at para. 99. [BOA, Tab 1]
[42] *Swain*, *supra*, at 1021-1022.

for the individual claimants, including in one instance mandating the Minister of Education to issue a certificate of eligibility for instruction in English.[43] In *Carter v. Canada*, when the government sought an extension of the suspended declaration of invalidity, this Court granted exemptions for not only the individual claimant, but any adult who wished to seek assistance in ending their life and who met the criteria in the original ruling.[44]

23. As this Court's own jurisprudence demonstrates, an individual remedy is sometimes necessary and desirable despite a suspended declaration of invalidity. An absolute ban on combining a s. 52 declaration with an individual remedy would unnecessarily and unprincipledly deny courts appropriate remedial powers and leave successful *Charter* claimants without effective relief. Courts must maintain the discretion to fashion an individual remedy where justified in the circumstances: "To create a right without a remedy is antithetical to one of the purposes of the *Charter* which surely is to allow courts to fashion remedies when constitutional infringements occur."[45]

PART III: SUBMISSIONS ON COSTS

24. The CLA makes no submissions as to costs.

PART IV: ORDER SOUGHT

25. The CLA takes no position on the proper disposition of the appeal.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 5th DAY OF FEBRUARY, 2020.

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[43] *Nguyen*, *supra*, at para. 47.

[44] *Carter v. Canada (Attorney General)*, 2016 SCC 4, at paras. 5-6. A personal exemption was denied in the original ruling in 2015, but on the basis that one claimant had died and the others did not seek an exemption: see *Carter* (2015), *supra*, at para. 129.

[45] *Nelles v. Ontario*, [1989] 2 S.C.R. 170, at 196.

PART V: AUTHORITIES RELIED ON

	Case	Paragraph reference in factum
1	*Canada (Attorney General) v. Bedford*, 2013 SCC 72	19
2	*Carter v. Canada (Attorney General)*, 2015 SCC 5	19, 21, 22
3	*Carter v. Canada (Attorney General)*, 2016 SCC 4	22
4	*Confédération des syndicats nationaux v. Canada (Attorney General)*, 2008 SCC 68	19
5	*Corbiere v. Canada (Minister of Indian and Northern Affairs)*, [1999] 2 S.C.R. 203	21
6	*Dunmore v. Ontario (Attorney General)*, 2001 SCC 94	19
7	*Eaton v. Brant County Board of Education*, [1997] 1 S.C.R. 241	8
8	*Figueroa v. Canada (Attorney General)*, 2003 SCC 37	19
9	*G. v. Ontario (Attorney General)*, 2019 ONCA 264	6, 7, 10, 19
10	*Health Services and Support – Facilities Subsector Bargaining Assn. v. British Columbia*, 2007 SCC 27	19
11	*Kahkewistahaw First Nation v. Taypotat*, 2015 SCC 30	4, 7
12	*Law v. Canada (Minister of Employment and Immigration)*, [1999] 1 S.C.R. 497	8
13	*Nelles v. Ontario*, [1989] 2 S.C.R. 170	23
14	*Nguyen v. Quebec (Education, Recreation and Sports)*, 2009 SCC 47	19, 22
15	*Quebec (Attorney General) v. A.*, 2013 SCC 5	6
16	*R. v. Boudreault*, 2018 SCC 58	19
17	*R. v. Ferguson*, 2008 SCC 6	20, 21
18	*R. v. Mernagh*, 2011 ONSC 2121	21
19	*R. v. Parker* (2000), 146 C.C.C. (3d) 193 (Ont. C.A.)	21
20	*R. v. R.Z.*, 2016 ONCJ 438	15
21	*R. v. Swain*, [1991] 1 S.C.R. 933	18, 22
22	*R. v. Tse*, 2012 SCC 16	19
23	*Re Eurig Estate*, [1998] 2 S.C.R. 565	19
24	*Re Manitoba Language Rights*, [1985] 1 S.C.R. 721	18
25	*Rodriguez v. British Columbia (Attorney General)*, [1993] 3 S.C.R. 519	21
26	*Schachter v. Canada*, [1992] 2 S.C.R. 679	18, 19, 20, 21
27	*Thompson and Empowerment Council v. Ontario*, 2013 ONSC 5392	8
28	*Thompson and Empowerment Council v. Ontario*, 2016 ONCA 676	8
29	*Winko v. British Columbia (Forensic Psychiatric Institute)*, [1999] 2 S.C.R. 625	1, 4, 8, 10
30	*Withler v. Canada (Attorney General)*, 2011 SCC 12	4, 7

SECONDARY SOURCES

	Source	**Paragraph reference in factum**
1	C. Mouland, "Remedying the Remedy: Bedford's Suspended Declaration of Invalidity" (2018) 41:3 Man. L.J. 281	21
2	G. R. Hoole, "Proportionality as a Remedial Principle: A Framework for Suspended Declarations of Invalidity in Canadian Constitutional Law" (2011), 49 Alta. L. Rev. 107	19

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	Case	**Paragraph reference in factum**
1	*Christopher's Law (Sex Offender Registry)*, 2000, S.O. 2000, c. 1 (English) ss. 3, 7(1), 7(4) (Français) ss. 3, 7(1), 7(4)	1, 2, 4, 7, 9, 12, 15
2	*Criminal Code*, R.S.C. 1985, c. C-46 (English) s. 730 (Français) s. 730	1, 4, 12, 14
3	*Criminal Records Act*, R.S.C. 1985, c. C-47 (English) s. 2.3 (Français) s. 2.3	12, 13, 15
4	*Highway Traffic Act*, R.S.O. 1990, c. H.8 (English) s. 1(6) (Français) s. 1(6)	15