

the status of Permanent Observer at the United Nations, rather than of a full Member. This is due primarily to the desire of the Holy See to obtain absolute neutrality in specific political problems." See: UN Permanent Observer Mission of the Holy See, "A Short History," <http://www.holyseemission.org/about/history-of-diplomacy-of-the-holy-see.aspx> (accessed 19 February 2015).

21. UN Permanent Observer Mission of the Holy See, Statement to Economic and Social Council, Discussion on the reports, "Impact on Indigenous Peoples," <http://www.ailanyc.org/wp-content/uploads/2010/09/Holy-See.pdf> (accessed 20 January 2015).
22. For example, in a study of how the doctrine was used to justify colonization, American legal scholar Robert A. Williams Jr. observed that the United States Supreme Court decision issued by Chief Justice John Marshall in 1823 in the case of *Johnson v. McIntosh* 21 U.S. 543 (1823), "represents the most influential legal opinion on indigenous peoples' human rights ever issued by a court of law in the Western world. All the major English-language-speaking settler states adopted Marshall's understanding of the Doctrine of Discovery and its principle that the first European discoverer of lands occupied by non-Christian tribal savages could claim a superior right to those lands under the European Law of Nations. Canada, Australia, and New Zealand all followed Marshall's opinion as a precedent for their domestic law on indigenous peoples' inferior rights to property and control over their ancestral lands." See: Williams, *Savage Anxieties*, 224. See also: Williams, *American Indian*; Miller et al., *Discovering Indigenous Lands*; Newcomb, *Pagans in the Promised Land*, 2008.
23. United Nations Economic and Social Council, Permanent Forum on Indigenous Issues, "Study on the Impacts of the Doctrine," <http://daccess-dds-ny.un.org/doc/UNDOC/GEN/N14/241/84/PDF/N1424184.pdf?OpenElement>.
24. Anglican Church of Canada, General Synod 2010, Resolution A086 R1, <http://archive.anglican.ca/gs2010/resolutions/a086/>.
25. Sison, "Primate's Commission." See also: Anglican Church of Canada, "Message to the Church," <http://www.anglican.ca/primate/communications/commission-on-discovery-reconciliation-justice>. See also: Anglican Church of Canada, "Learning to Call One Another Friends," [http://www.anglican.ca/primate/files/2014/06/PCDRJ\\_June2014\\_Update.pdf](http://www.anglican.ca/primate/files/2014/06/PCDRJ_June2014_Update.pdf).
26. World Council of Churches, *What Is the World Council of Churches?*, <http://www.oikoumene.org/en/about-us> (accessed 15 April 2015). Settlement Agreement signatories the Anglican Church of Canada, the Presbyterian Church in Canada, and the United Church of Canada are members of the WCC.
27. World Council of Churches, *Statement on the doctrine of discovery*, <http://www.oikoumene.org/en/resources/documents/executive-committee/bossey-february-2012/statement-on-the-doctrine-of-discovery-and-its-enduring-impact-on-indigenous-peoples> (accessed 20 March 2015).
28. Executive of the General Council of the United Church of Canada, *Meeting Summary, March 24-26, 2013*, [http://www.united-church.ca/files/general-council/gc40/gce\\_1203\\_highlights.pdf](http://www.united-church.ca/files/general-council/gc40/gce_1203_highlights.pdf) (accessed 20 March 2015).
29. United Nations Permanent Forum on Indigenous Issues, "Joint Statement," [http://www.afn.ca/uploads/files/pfii\\_2012\\_-\\_doctrine\\_of\\_discovery\\_-\\_joint\\_statement\\_fe.pdf](http://www.afn.ca/uploads/files/pfii_2012_-_doctrine_of_discovery_-_joint_statement_fe.pdf) (accessed 20 March 2015).
30. United Nations Permanent Forum on Indigenous Issues, "Study on the Impacts of the Doctrine," para. 13, <http://daccess-dds-ny.un.org/doc/UNDOC/GEN/N14/241/84/PDF/N1424184.pdf?OpenElement> (accessed 14 March 2015). For the views of the court on the need for reconciliation, John cited *Haida Nation v. British Columbia (Minister of Forests)*, 2004 SCC 73 (CanLII), para. 20. For the judicial notice on colonialism, Snow cited *R. v. Ipeelee*, 2012 SCC 13 (CanLII), para. 60.