

TORONTO - April 9, 2005 - The Canadian Council of Muslim Women presents:
**Muslim Women's Equality Rights in the Justice System:
Gender, Religion and Pluralism**



WORKSHOP REPORT:

**PUBLIC POLICY AND THE
APPLICATION OF
RELIGIOUS LAWS IN FAMILY
MATTERS**

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Introduction

On April 9, 2005, the Canadian Council of Muslim Women (CCMW) hosted a symposium entitled ***Muslim Women's Equality Rights in the Justice System: Gender, Religion and Pluralism***. This event was organized to raise awareness and engage in dialogue, as a priority, regarding the implications of Marion Boyd's report *Dispute Resolution in Family Law: Protecting Choice, Promoting Inclusion*. Ms. Boyd's report is based on her review of the *1991 Arbitration Act*. The recommendations of her report would allow arbitration tribunals in Ontario to settle family matters under Sharia or Muslim family law. Speakers at the Symposium represented both sides of the debate and included scholars, activists and professionals in human rights, women's rights and the legal arena. There was also representation from an international perspective.

Representatives from five different organizations participated in a workshop entitled "Public Policy and the Application of Religious Laws in Family Matters." The discussions focused specifically on responses to Marion Boyd's report. The panellists also commented on their consultations with Ms. Boyd held prior to, or following the release of the report. The participating organizations included the National Association of Women and the Law (**NAWL**), the Muslim Canadian Congress (**MCC**), the Women's Legal Education and Action Fund (**LEAF**), the National Organization of Immigrant and Visible Minority Women of Canada (**NOIVMWC**) and **Rights and Democracy** (International Centre for Human Rights and Democratic Development).

Although CCMW's position was not presented at the workshop, it was reflected in the written materials provided at the Symposium. Since there has been much collaboration among the organizations on this issue, the organizations represented at this workshop were familiar with CCMW's position. This report provides a summary of the positions presented by each of the organizations, followed by a summary of the major themes and finally, suggestions for further action, based on the discussions in the workshop. For the purpose of this report, a summary of CCMW's position sets the stage for comparison of positions among the organizations represented in the discussion.

Positions

CANADIAN COUNCIL OF MUSLIM WOMEN (CCMW)

On January 14, 2005, in their response to Marion Boyd's report (released December 20, 2004), CCMW wrote to Premier Dalton McGuinty and Attorney General Michael Bryant expressing their serious concerns about the *Arbitration Act* on a number of fronts. Below is a summary of their communication.

Settlement of Family Matters under *Family Law Act*

CCMW recommended that family matters be exempt from the *Act*, "as they are a matter of public order, as is the case in Quebec." They have stressed their commitment to advocating for the removal of family matters from the *Act* to protect women's equality rights and ensuring that family matters continue to be settled under the *Family Law Act (FLA)*.

Muslim Family Law and Impacts on Women's/Equality Rights

CCMW has serious concerns regarding the impacts of arbitration on women. In their response, CCMW questioned why Ms. Boyd recognizes the potential harmful impacts on women and children resulting from the implementation of Muslim family law but she does not address these concerns in her recommendations.

CCMW acknowledged that faith-based arbitration is used to settle some disputes, however, their understanding is, that it is limited. CCMW was also careful to point out that it is not a matter of capability or capacity of Muslim women to make decisions, but rather the influence of their family and community to pressure them to participate in arbitration, that is of great concern. These pressures cannot be underestimated. Ms. Boyd has also recognized this possibility in her report but not addressed its impact.

While CCMW believes that Ms. Boyd's recommendations to introduce amendments and safeguards to the *Arbitration Act* and its use in the *Family Law Act* are well intentioned, they feel these measures "do not address the potential harm to women if religious laws are applied."

CCMW also questioned why Ms. Boyd has recommended the use of religious laws to settle family and inheritance disputes when she points out in her report that there is a lack of information on the impact of religious arbitration on women.

CCMW believes that "use of Muslim family law will erode the equality rights of Muslim women that are guaranteed under the *Canadian Charter of Rights and Freedoms* and other Canadian laws. CCMW agrees with Ms. Boyd that many years of hard work in the area of equality rights in Canada could be undone to the disadvantage of women, children and other vulnerable people and again questioned why Ms. Boyd has recommended the arbitration tribunal despite this acknowledgement.

Consistent Application

CCMW also recognizes the difficulty in consistent application of Muslim family law. They have emphasized there is "no one codified, agreed upon single law upon which a statement of principles of faith-based arbitration, as suggested by Ms. Boyd, can be based," since Muslim family law is applied differently throughout the world. It will be difficult to achieve consensus on the statement and on the application of Muslim family law.

Education and Training of Arbitrators

Another area of concern is the education and training of Arbitrators. Since Ms. Boyd's recommendations do not call for mandatory training of Arbitrators in Alternate Dispute Resolution (ADR) and education of Arbitrators in Muslim jurisprudence is not addressed, CCMW questions "who the Arbitrators will be and what knowledge and expertise they will possess in Muslim jurisprudence?"

Efficient Use of Resources

CCMW is concerned about full compliance with record keeping and reporting despite the recommendations on oversight and evaluation of Arbitrators since the mechanisms required to do this effectively, will need additional resources.

While CCMW welcomes the provision of more public education regarding family law and arbitration, there is concern over the resources required to do this well so that those in greatest need of the information, receive it.

CCMW believes the resources required to implement the proposed safeguards necessary for ADR for family matters should be "redirected to improve the existing justice system e.g. increased use of cultural interpreters, cultural/religious sensitivity training for judges and lawyers, etc."

CCMW strongly opposes the use of public funds to develop information materials about rights and obligations under religious laws and would prefer the use of these funds towards improving the justice system.

CCMW believes the recommended waivers of receiving legal advice about Canadian and Ontario family law and Ontario arbitration law, should not be permitted. Legal aid would not be available under private arbitration.

CCMW believes the use of religious laws under the *Arbitration Act* will legitimize "practices that are abhorred by fair-minded Canadians, including Muslim women", and have urged the Premier and Mr. Bryant to reject the application of religious laws under the *Arbitration Act*.

NATIONAL ASSOCIATION OF WOMEN AND THE LAW (NAWL)

Andrée Côté, Director of Legislation and Law Reform at the National Association of Women and the Law (NAWL) presented their position. NAWL was deeply disappointed with the report and have called on the government not to implement the recommendations made in Marion Boyd's report. NAWL's position is formulated on four major points as follows:

- oppose arbitration in family law
- oppose faith-based arbitration in family law for all religions
- regulate mediation
- call on improvements in the justice system

Opposition to Arbitration in Family Law

NAWL feels that arbitration in family law is not appropriate since it was developed to respond to commercial deals and not with the family in mind. Its' application in family law is inappropriate where "gender dynamics, unequal power relations between men and women and the systemic discrimination are always at play." Like the CCMW, Ms. Côté also stressed that substantial reforms achieved in family law and hard battles which have been won for equality and human rights for families, would be threatened. Allowing individuals and families to choose arbitration which is based on religious, family or traditional values, side-steps the principles achieved to date.

According to NAWL, arbitration would introduce a two-tiered system of justice where a third party is named as a justice and will allow new judges, community and religious leaders to impose their decisions, rather than "mediation under which parties agree or not to a resolution." These Arbitrators will be unaccountable and the decision will be legally binding. This system will allow financially better off individuals to choose to pay for private justice and the law that applies, while more vulnerable individuals will not be able to access legal representation as the arbitration route will not be supported by legal aid. They may be forced to choose faith-based arbitration which may be free. NAWL also has serious concerns regarding the finality of Arbitrators' decisions.

NAWL challenges Ms. Boyd's notion of choice which doesn't recognize "the dynamics of separation, divorce nor the social and economic conditions of married, divorced, immigrant women and racism within the legal system and society in general." These factors will weigh heavily and restrict women's choices.

NAWL also takes issue with Marion Boyd's report in claiming that arbitration is not subject to the *Canadian Charter of Rights and Freedoms* because it is a private matter. This means "there is no equality rights framework to guard arbitration and that the government has no obligation to ensure that there is equality for women and other vulnerable individuals in the system." NAWL believes that Ontario and Canada are bound by human rights obligations under the "*Charter*" and international instruments such as the *Convention on the Elimination of all Forms of Discrimination against Women*. They agree with CCMW that "use of Muslim family law will erode the equality rights of Muslim women that are guaranteed under the *Canadian Charter of Rights and Freedoms* and other Canadian laws.

Like the CCMW, NAWL also believes that arbitration should not be available in the case of family law, as is the case in Quebec.

Opposition to Faith-based Arbitration

NAWL acknowledges that while freedom of religion gives the right to create religious tribunals, it does not give the right for religious tribunals to give decisions that are legally binding and should only be advisory in nature. Furthermore, Ms. Côté stressed that these legally binding decisions actually violate freedom of religion and the separation between church and state.

Regulate Mediation

NAWL believes that mediation be subject to legislative standards and family law standards and that we must not permit women to consent to discriminatory decisions.

Improve Justice System

Ms. Côté concluded by saying that NAWL also calls for the government to improve the justice system to make traditional family courts more efficient, instead of arbitration in family law. They would also like to see training and education for judges, lawyers, etc., regarding other cultures and religions.

MUSLIM CANADIAN CONGRESS (MCC)

Rizwana Jafri (President, MCC) and Tarek Fatah, spoke on behalf of the Muslim Canadian Congress (MCC). The MCC explained that many issues arose in their meeting with Ms. Boyd. They believe it was inappropriate for Ms. Boyd to have conducted this review of the *Arbitration Act*, since it was her party, under Bob Rae, who implemented the *Act*, and challenged her on this point. Since the justice system needed improvements, the MCC feels the government introduced arbitration as a cheaper way to resolve family or personal matters.

Lack of Understanding of Issues/Impacts on the Community

The MCC felt that Ms. Boyd lacked an understanding of the issues related to the introduction of arbitration of family matters and she did not understand the complexity of "the religion or the diversity of the Muslim community."

The MCC also believes it would "ghettoize the community" and further exclude Muslims from the mainstream. Ms. Boyd's belief is that the government is being less discriminatory by introducing arbitration in family law.

Maintain State Family Law

Like the other organizations, the MCC feels that arbitration does have a place in society but not in family matters and should remain within state family law and removed from arbitration. Mr. Fatah added that MCC's position was not primarily from the Muslim gender perspective, as is the case with the other groups, but that the *Arbitration Act* intrudes on the principle that "citizenship is not based on inherited ancestry or religions," and subject to legislative scrutiny. In democratic societies such as Canada, society plays a role in the welfare of children, rather than in Muslim societies where the parents and

primarily the father, own the child. Mr. Fatah explained that arbitration in family law or the desire for Muslim or Sharia courts, is a response to Muslim fundamentalists and would allow them to make decisions in their favour. He believes this reality is at the core of this issue.

The MCC believes that establishing a multi-tiered judicial process for family law is "racist and unconstitutional, since it breaches the *Canadian Charter of Rights and Freedoms* and other norms or rights enunciated by the Supreme Court of Canada." Mr. Fatah emphasized that this issue is not one to be debated in the Parliament since MPPs are being pressured by a small group of people favouring Muslim or Sharia laws.

In conclusion, the MCC recommends that this matter be referred to the Ontario Court of Appeal.

WOMEN'S LEGAL EDUCATION ACTION FUND (LEAF)

Cindy Wilkey, who is Co-Chair of the Women's Legal Education Action Fund (LEAF), National Legal Committee thanked CCMW for organizing the Symposium and said LEAF felt privileged to be a part of this important event. Ms. Wilkey started by saying that LEAF's response to Marion Boyd's report is similar to that of the other organizations participating in the workshop and found it to be "wholly unsatisfactory and disappointing." As noted later in this report, LEAF, however is willing to endorse arbitration if certain conditions are guaranteed.

Impact on Women's/Equality Rights

LEAF also believes Marion Boyd's report fails to incorporate a meaningful gender analysis and rather than promoting inclusion, allows the creation of "separate family law regimes within religiously defined communities" to the disadvantage of women of those communities, depriving them of the rights guaranteed to other Ontario women." It provides an imbalance of women's equality rights and religious freedoms and fails to provide meaningful protection for those whom arbitration is inappropriate.

Opposition to Family Law Arbitration

There is no reviewer scrutiny of the *Arbitration Act* and LEAF's position is consistent with that of the other organizations regarding this issue. Ms. Wilkey stressed that family laws should be public laws. LEAF recognizes that people are free to make voluntary decisions but there is concern when families cannot make decisions and that's when LEAF believes Ontario or Canadian family law must apply. LEAF also believes that the "safeguards" recommended in the report to not address the issue of "choice" for women who could be coerced or pressured into using religious arbitration. They do not support religious arbitration.

Like the other organizations, LEAF disagrees with the report's claim that the *Canadian Charter of Rights and Freedoms* does not apply to family matters, since it is the government that would be involved in providing the "regime and mechanisms under which such arbitration can be enforced."

Advantages of Arbitration Process

LEAF has a different approach related to "the mechanism of decision making." LEAF acknowledges that arbitration does offer some relief from the harshness of family law courts and that the parties have more control over arbitration than the courts relating to timing, who will be involved and where it will be carried out. In Ontario, there is not a specialized family court, so the judge hearing any one dispute may not have a deep understanding of family issues. In places where secular family law arbitration is well established, experienced family law lawyers are highly respected mediators. Arbitration is less adversarial and informal and more tailored to meet the needs of the relevant culture or community. Arbitration can provide the significant benefit of resolving issues more quickly than the courts and being less costly as a result.

LEAF believes arbitration can only be endorsed under the following conditions:

- Canadian and Ontario law controls decisions by arbitration
- Arbitrators should be lawyers (in Canadian and Ontario law), qualified to practice in Ontario
- legal aid funding should be extended to arbitration
- ensure voluntary and informed consent to choose arbitration
- address huge lack of knowledge of family law arbitrations and promotion of women's equality rights by requirement to file family law arbitration in a central location

Family Law Act Review

LEAF has continued to review its position and recently communicated with the Attorney General of Ontario and identified their criticisms of Marion Boyd's report, emphasizing that they have a serious concern regarding "entirely unregulated arbitration." They have recommended that the province take an interim step of either requiring that "only Canadian and Ontario law be the law permissible for family law arbitration under the *Arbitration Act* or that family law arbitration, simply be banned." In the longer term, LEAF has recommended that a review of the *Family Law Act* be undertaken to:

- determine how arbitration could be brought within the *Family Law Act*
- ensure that the law applied is both Ontario and Canadian law and;
- ensure the family law principles developed within the family law, especially principles promoting women's equality, guide family law arbitrations

NATIONAL ORGANIZATION OF IMMIGRANT AND VISIBLE MINORITY WOMEN OF CANADA (NOIVMWC)

Anu Bose, Executive Director of the National Organization of Immigrant and Visible Minority Women of Canada (NOIVMWC), spoke from a public policy perspective. She began her discussion by saying that NOIVMWC had worked closely with CCMW on this issue, noting in jest that NOIVMWC had played the “supporting actress role”, with CCMW taking the lead on the efforts regarding faith-based arbitration and Marion Boyd’s report.

Opposition to family law arbitration

NOIVMWC is opposed to the use of any religious principles within the *Arbitration Act*. They would like to see the removal of family matters from arbitration and reject the use of any kind of religious principles in matters regarding family, the dissolution of marriage, or inheritance.

Lack of Understanding of Women’s/Minority Issues

NOIVMWC was extremely disappointed in Ms. Boyd’s suggestion that NOIVMWC was “anti-family and anti-multiculturalism.” As an organization representing immigrant and visible minority women, NOIVMWC sees a stable family life as an inherent right and sees the recommendations of the report as a lack of support for immigrant families in Canada. Ms. Bose was troubled by being labelled “anti-multiculturalism” when she had questioned the merits of using “traditional authority” in deciding the fates of vulnerable women and individuals.

Like most of the other organizations supporting CCMW, NOIVMWC is concerned that the arbitration process is outside the purview of legal aid. Secondly, Ms. Bose regretted the fact that Ms. Boyd did not conduct any gender-based analysis i.e. did not engage in assessing the differential impact that the *Arbitration Act* has and continues to have, on women and men. Therefore, Ms. Boyd did not understand the role of coercion or of potential immigrant status withdrawal, which women could face. NOIVMWC is committed to this issue and will continue to voice their opposition to religious arbitration, along side the other organizations.

Ms. Bose concluded by saying that organizations such as NOIVMWC and CCMW have to engage the rest of the community to raise awareness of this issue but do it in the various immigrant languages.

**RIGHTS AND DEMOCRACY
(INTERNATIONAL CENTRE FOR HUMAN RIGHTS AND DEMOCRATIC DEVELOPMENT)**

Ariane Brunet spoke on behalf of Rights and Democracy and brought their international perspective to the issue. Ms. Brunet warned the introduction of arbitration in family law could violate international human rights obligations and sets a dangerous precedence for women’s equality rights both in the

national and international arena. On the international front, Ms. Brunet cited recent incidence of using women's rights to justify foreign policy e.g. in Afghanistan, where women's rights were "instrumentalized". Rights and Democracy believes that with the introduction of arbitration in family law, women's rights are being "invisibilized".

Opposition to Family Law Arbitration

Rights and Democracy is also troubled by privatized family law arbitration that allows religious, cultural and political elites to make decisions. Like some of the other organizations Rights and Democracy is extremely concerned about who these leaders or decision makers are. Ms. Brunet also stressed that by privatizing family law decisions, there is an infringement in Ontario of the *Bill of Human Rights, the Convention of Discrimination* and other protections against discrimination against women and violence against women. This approach defeats the purpose of taking advantage of progressive forces and the government would forfeit its obligations under international rights of due diligence, if this course was taken.

Impact on Women's/Equality Rights/International Obligations

As per other organizations, Rights and Democracy fears the dangerous impact on women, since Ms. Boyd has not conducted an analysis on this impact. Although Rights and Democracy recognizes, "that the right to freedom of religion includes the right to participate in religious processes involving family matters", the report does not address women's rights. Ms. Brunet highlighted that United Nations *Special Rapporteurs on Violence Against Women and on Women's Rights* have stressed that "states must not invoke any customs, traditions or religious considerations to avoid their obligations with respect to elimination of violence and discrimination against women." Rights and Democracy also referenced the *Special Rapporteur on Violence against Women* in pointing out that in considering "cultural rights there is always a conflict with women's rights. Ms. Brunet explained that if we are to reconcile culture, diversity and the protection of women's rights, it is essential that there are three ingredients as follows: "the right to choose, voluntariness and maintaining the integrity of the woman making the decision. "

Ms. Brunet cautions about the current regressive forces in North America and Europe that are having effects around other parts of the world. She stressed the importance of staying connected with other organizations on a global scale. There are positive signs of solidarity from organizations such as the Network of Women Living under Muslim Law and women who have come to speak from Iran, Afghanistan and Uzbekistan. This dialogue and engagement is critical when initiatives such as the introduction of religious arbitration in family law could have a ripple effect.

SUMMARY OF MAJOR THEMES

- clear evidence that the participating organizations have consistent positions on a majority of the issues
- resounding consensus that family matters should not be subject to arbitration whether it is faith-based or not. Privatizing the settlement of family matters should simply not be an option
- clear recognition of a lack of understanding of the diversity of the Muslim community and of the impacts on women and other vulnerable groups, should Muslim family law arbitration be introduced
- most of the organizations also warned of the losses which would be incurred on the women's equality rights front
- likelihood of women being coerced into agreeing to arbitration was emphasized again and again
- serious concerns regarding the legally binding nature of the decisions and the unavailability of legal aid if arbitration is the selected route
- from legal perspective, there is evidence that arbitration of family matters encroaches upon the *Canadian Charter of Rights and Freedoms* and violates some international obligations while setting a dangerous precedence in Canada, North America and globally
- while other organizations do not accept arbitration at all, LEAF has recognized some benefits of arbitration but insists that it can only be applied under strict guidelines and therefore, must be regulated. They have also recommended the Ontario government conduct a thorough review of the *Family Law Act*, to determine if arbitration can be brought into the *Family Law Act*.
- MCC has urged that this debate to be settled by the Ontario Court of Appeal

The table in the next section summarizes the various issues or positions which were highlighted along with relevant comments or actions.

POSITION SUMMARY

Position	Comments /Actions
Settlement of family matters by arbitration	<ul style="list-style-type: none"> • Most organizations oppose family law arbitration. • Provincial government must review the <i>Family Law Act</i> and maintain it
Settlement of family matters by faith-based arbitration	<ul style="list-style-type: none"> • All organizations oppose faith-based arbitration. • Provincial government must review the <i>Family Law Act</i> and maintain it
Value of arbitration under strict conditions	<ul style="list-style-type: none"> • LEAF recognizes culturally relevant, less adversarial and efficient nature of arbitration versus the courts, but also believes arbitration can only occur under strict conditions
Matter to be referred to Ontario Court of Appeal	<ul style="list-style-type: none"> • MCC has warned that Parliamentarians cannot debate this issue, due to pressures on MPPs from Muslim/Sharia law supporters
Lack of understanding of impacts on women/threatens equality rights for women	<ul style="list-style-type: none"> • General recognition that recommendations are regressive in that they would undo many years of hard work achieved to date for women's equality rights and family law reforms. • Provincial government must conduct in-depth analysis of the impact of arbitration on women, especially Muslim women, and on the diversity of the community both culturally and religiously
Role of Coercion in agreeing to arbitration	<ul style="list-style-type: none"> • This is a general fear. • Provincial government must ensure guarantees to voluntary and informed choice, especially for Muslim women
Inconsistent with <i>Canadian Charter of Rights and Freedoms</i>	<ul style="list-style-type: none"> • All organizations recommend the Provincial government conduct careful review of equality rights in "the <i>Charter</i>" for women, children and other vulnerable individuals which would be compromised under arbitration
Violation of international human rights/women's rights obligations/dangerous precedence setting	<ul style="list-style-type: none"> • Several of the organizations cited this as a dangerous direction and urge a thorough examination of international obligations/ramifications

Position	Comments /Actions
Difficulty in consistent application of Muslim family law	<ul style="list-style-type: none"> Some organizations warned that it is virtually impossible to reach consensus on what will guide arbitration and how the process would work within such a diverse community
Quality/education and training/background of Arbitrators	<ul style="list-style-type: none"> General belief that Arbitrators must be lawyers in Ontario and Canadian law
Compliance/oversight resources versus improvements in the current justice system	<ul style="list-style-type: none"> General consensus that the resources be redirected to current justice system by sensitizing the system to cultural, religious and women’s issues and increase efficiencies
Legal advice waivers and availability of legal aid	<ul style="list-style-type: none"> There is a general call for legal aid to be extended if arbitration is introduced and waivers of legal advice on Ontario and Canadian law must be removed.
Legally binding decisions	<ul style="list-style-type: none"> Most groups believe finality of decisions is problematic, especially since they are not subject to scrutiny under Ontario and Canadian laws and violate freedom of religion rights
Unregulated mediation	<ul style="list-style-type: none"> NAWL asks that mediation must be subject to legislative standards
Citizenship should not be based on inherited ancestry or religions	<ul style="list-style-type: none"> MCC believes that arbitration of family matters intrudes on this principle

Based on common recognition of the issues related to the introduction of arbitration to settle family matters under Muslim/Sharia law, there are opportunities to take joint and individual action. Towards to the end of the workshop, all participants, including members of the audience, were requested to make suggestions to move the dialogue to action. Based on this feedback and the suggestions cited earlier in this report, the next section outlines the actions that may be taken, to affect positive change.

SUGGESTIONS FOR FUTURE ACTION

- 1) Attain a clear understanding of where the government is in terms of the status of Ms. Boyd's report, status of the *Arbitration Act* etc.
- 2) Establish a common voice, develop common goals and agree on milestones
- 3) Develop an engagement strategy that will:
 - a) communicate the joint position, discussions and decisions to politicians, scholars, media, the Muslim community and the public at large
 - b) educate and engage the grassroots level by formulating a clear, simple message to address the implications of arbitration
- 4) Mobilize Muslims who oppose Muslim/Sharia tribunals to join in efforts to take action
- 5) Develop a strategy on how to engage proponents of Muslim/Sharia tribunals
- 6) Continue dialogue with and learn from individuals and groups around the world, who are challenged by and dealing with similar issues
- 7) Prepare a joint position paper for release to the Premier and Attorney General
- 8) Prepare a joint press release
- 9) As a coalition, demand a meeting with the Premier and the Attorney General

In conclusion, there is an immediate need for the participating organizations to meet and begin moving these suggestions into concrete action and to formulate a joint position paper demanding the Ontario government to conduct a review of the *Family Law Act*, a detailed gender analysis and other actions listed in the issues summary table above.