

Pierre Trudeau's Patriation of Canada's Constitution

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Following Canada's centennial celebration in 1967, a determined new Prime Minister took office. Pierre Trudeau's ambitious ideals for the nation captured what many felt for a brief time in the spectacles of 1967. Driven by a strong motivation to promote national unity, Trudeau tackled many issues in the 1970s and early 1980s like Quebec separatism, stagflation, and an international oil crisis. His prime directive, however, was to work towards his vision of a just society in Canada. In his just society, federalism was reinforced, and the nation could be united under a progressive charter of rights to guarantee basic human rights for all Canadians. A primary aspect of this labour was to institute ambitious constitutional reform. It would not be until 1982, after more than a decade in office, that Trudeau would achieve the Constitution Act and bring Canada's Constitution fully within Canadian borders. In his attempt to patriate the Constitution to strengthen national unity, Trudeau was challenged by the provincial governments who fought to protect their autonomy. Leading the provincial fight was the so-called Gang of Eight, which included Québec premier René Lévesque and Manitoba premier Sterling Lyon. Patriation was intrinsically tied with the Charter of Rights and Freedoms and constitutional reform. While these later developments were significant for Canadians, patriation was the necessary initial step in order to achieve them. The Constitution needed to come home from the British Parliament so that constitutional changes were carried out solely by the hands of Canadians. Trudeau found success in patriating the Constitution, but it came home to a Canada with renewed schisms since Québec was the only province that refused to sign on. Patriating Canada's Constitution was supposed to be Trudeau's solution to national unity and Québec separatism. However, when it was achieved, it was done at the expense of further alienating Québec and isolating it outside the Constitution Act, 1982. While the final product was certainly not what Trudeau envisioned, it is undeniably clear that Trudeau's primary motivation towards patriation was his commitment to promoting national unity.

Pierre Trudeau had been a strong advocate for national unity and strong federal government for much of his adult life. His stance is best captured in the statement issued by the Liberal government of Lester Pearson at the Constitutional Conference of 1968. The statement, drafted by Trudeau, contained a rejection of recognizing two distinct nations within Canada, an idea proposed by the Québec Liberal Daniel Johnson.¹ Instead, it endorsed the recommendations made by the Royal Commission on Bilingualism and Biculturalism to "render more fair and equal the position of Canadians of French language and culture in Canada."² The Quiet Revolution in Québec in the 1960s and the rise of Québec separatism in the 1970s only served to further entrench Trudeau in his stance that a strong federal government was the best solution to internal and external threats to the citizenry, including Québec separatism.³ The political context in which

¹ Constitutional Conference, 1968, *Federalism for the Future: A Statement of Policy by the Government of Canada* (Ottawa: February 5-7 1968), 14, <https://primarydocuments.ca/wp-content/uploads/2018/02/FedFuture1968Feb5.pdf>.

² Constitutional Conference, 1968, *Federalism for the Future*, 6.

³ Pierre Elliott Trudeau, "Nationalism and Federalism," *Theories of Federalism: A Reader*, ed. Dimitrios Karmis and Wayne Norman (New York: Palgrave Macmillan, 2005), 222-223, https://doi.org/10.1007/978-1-137-05549-1_20.

Trudeau had operated was an era of competition between division and unity. Provincial autonomy has always dissented against Canadian constitutional endeavours, and is fundamentally opposed to anything that reinforces national standardization and unification. As a proponent of the unity camp, one of the most important mechanisms to strengthen national unity in Trudeau's arsenal, then, was patriating the Canadian Constitution.

Patriation of the Constitution had been a desire for some previous governments, such as Louis St. Laurent's Liberals, but never was it so strongly willed as it was by Trudeau. The terms "patriate" and "patriation" were created in Canada to acknowledge "the legal reality" that the Constitution Act of 1867 had never been "legally domiciled" in Canada.⁴ In other words, patriation meant bringing the nation's foundational legislation fully within the legal realm of Canada and Canada alone. To Trudeau, the term patriation meant bringing the Canadian Constitution back to Canada and removing the British Parliament from Canadian Constitutional affairs.⁵ His vision of a strong central government included the capacity of said government to amend its own constitution without appealing to another country's parliament. Furthermore, "patriation, an amending formula, and a constitutionally entrenched charter of rights would engage Québec more fully in the Canadian federation."⁶ It was a necessity to unify Canada and would allow Canadians to proudly identify with a nation that was in control of its own constitution. Trudeau wasted little time negotiating with the provinces regarding patriation and constitutional amending when he became Prime Minister in 1968. By 1971, the most defining of the Constitutional Conferences to date was held in Victoria and set a precedent for the following decade.

In June 1971, Premier W. A. C. Bennett of British Columbia hosted the first ministers of Canada in Victoria to negotiate the previous agreement of the premiers to patriate Canada's Constitution. This Constitutional Conference laid the groundwork for what would be known as the Victoria Charter, which included patriating the Canadian Constitution, an amendment formula, and social policy improvements.⁷ The Victoria Charter fit Trudeau's ambitious goals for constitutional reform enough that he anticipated wearing "a crown of laurels" at its passage.⁸ While that moment never came, the Victoria Charter was the first and most tangible example of what patriation would look like. The proposed Charter, amendment formula, and several other provisions would be "incorporated into the Constitution at the time of Patriation."⁹ For a brief moment before the end of June, it seemed as though Trudeau would get his constitutional reform as all first ministers gave their tentative approval. Unfortunately for Trudeau, Québec Liberal Party Premier Robert Bourassa declined to put it before the Québec Legislature. Bourassa stated that Québec needed to gain "more control over federally funded social programs" and that to sign the agreement would be to abandon Québec's "bargaining power," as *Le Devoir* journalist Claude

⁴ James R. Hurlley, *Amending Canada's Constitution: History, Processes, Problems and Prospects*, Privy Council Office: Policy Development and Constitutional Affairs, 1996, 25.

⁵ Eric M. Adams, "Constitutional Nationalism: Politics, Law, and Culture on the Road to Patriation," in *Patriation and its Consequences: Constitution Making in Canada*, ed. Steve Patten and Lois Harder (Vancouver: UBC Press, 2015), 49, <https://web-b-ebscohost-com.ezproxy.macewan.ca/ehost/ebookviewer/ebook/ZTAwMHhuYV9fOTMzMDEwX19BTg2?sid=6edb77b7-8487-4a54-87f0-11e708911552@pdc-v-sessmgr02&vid=0&format=EB&rid=1>.

⁶ Lois Harder and Steve Patten, "Looking Back on Patriation and Its Consequences," in Patten, *Patriation and its Consequences*, 4.

⁷ Constitutional Conference, 1971, *Canadian Constitutional Charter 1971* (Victoria: June 14-16 1971),

<https://www.canada.ca/en/intergovernmental-affairs/services/federation/constitutional-conference-victoria-1971.html>.

⁸ John English, *Just Watch Me: The Life of Pierre Elliott Trudeau 1968-2000*, vol. 2 (Toronto: Alfred A. Knopf Canada, 2009), 136.

⁹ Constitutional Conference, 1971, *Canadian Constitutional Charter 1971*.

Ryan put it.¹⁰ In his attempt to reinforce Québec autonomy, Bourassa also halted the federal-provincial discussion of constitutional reform until the end of the 1970s.¹¹

Bourassa's declination of the Victoria Charter is indicative of the role that provinces played in constitutional reform. While the Constitution would remain at the federal level if patriated, provincial governments wanted to protect their autonomy concerning new constitutional legislation, primarily the Charter of Rights and Freedoms.¹² The federal-provincial tension that has always been so pervasive to any national endeavour certainly did not spare the patriation of the Constitution. Having lost power to Joe Clark and the Conservatives briefly in 1979, Trudeau entered the 1980s with a mandate for renewed federalism. After an astounding victory in the February 1980 election, Trudeau decided not to pursue any sort of "federal-provincial cooperation," especially in the area of patriation.¹³ A decade after the failure of the Victoria Charter and stifled discussion over constitutional reform, Pierre Trudeau announced his plan to proceed with his constitutional reform without the provinces in early October 1980.¹⁴ As he put it, "there are some things you have to do decisively, without cooperative federalism."¹⁵ In his mind, the price of such a strong move by the federal government would be paid by the an increasingly united Canada. Trudeau's plan to proceed unilaterally entailed the immediate patriation of the Constitution and the passage of a charter of rights very similar to those negotiated in Victoria in 1971. An amending formula was included as well, but contained more flexibility for negotiating for two years after passage. After Trudeau had announced his plan, a national referendum was held to decide between the Victoria formula or a proposal agreed to by at least eight provinces representing 80% of the population.¹⁶ However, the unilateral move for patriation faced resistance from most provincial legislatures, most notably from Manitoba and Québec.

Manitoba was the first to make a strong case against unilateral patriation. In December 1980, the Lieutenant-Governor of Manitoba, the Honourable Francis Laurence Jobin, made a reference to the Manitoba Court of Appeal regarding unilateral patriation. It essentially asked whether it was a "Constitutional Convention" for the federal government to proceed with patriation without the agreement of the provinces' governments and legislatures.¹⁷ Similar references were made to five other provincial courts, as well as by the Four Nations Confederacy which was a collection of Indigenous governing groups acting on behalf of multiple Indigenous nations within Canada. With the exception of Newfoundland, most provincial courts ruled that a charter of rights would infringe upon provincial powers granted under Section 92 of the British North America Act of 1867.¹⁸ Otherwise, patriation and a constitutional amendment formula would be constitutionally legal. The most influential of these court rulings came from the Québec Court of Appeal. In April 1981, it upheld the federal government's argument and stated that unilateral patriation was

¹⁰ English, *Just Watch Me*, 136.

¹¹ Barry L. Strayer, "The Evolution of the Charter," in Patten, *Patriation and its Consequences*, 80.

¹² Margaret Polk, "The Politics of Patriation: The Canada Act of March 1982," *London Journal of Canadian Studies* (November 2019): 2-3, <https://doi.org/10.14324/111.444.lics.2019v34.002>.

¹³ Pierre Elliott Trudeau, *Memoirs* (Toronto: McClelland & Stewart Inc., 1993), 270.

¹⁴ Philip Girard, "Law, Politics, and the Patriation Reference of 1981," in Patten, *Patriation and its Consequences*, 116.

¹⁵ Trudeau, *Memoirs*, 271.

¹⁶ Girard, "Law, Politics, and the Patriation Reference of 1981," 116.

¹⁷ Edward McWhinney, *Canada and the Constitution 1979-1982: Patriation and the Charter of Rights* (Toronto: University of Toronto Press, 2018), 74-75. <https://search-ebscohost-com.ezproxy.macewan.ca/login.aspx?direct=true&db=e000xna&AN=2027600&site=ehost-live&scope=site>.

¹⁸ McWhinney, *Canada and the Constitution 1979-1982*, 77.

"founded in legality."¹⁹ However, before the Manitoba and Québec Courts of Appeal could conclude their rulings, Pierre Trudeau had already allowed his unilateral patriation proposal to go to the Supreme Court of Canada.

Trudeau was confident that the Supreme Court of Canada would rule in his favour, that unilateral action on the part of the federal government would be constitutional. Any reservations he had regarding federal-provincial relations were nearly gone, as he recognized that unilateral action "could tear up the goddamn country," but was "going to do it anyway."²⁰ Two events in 1980 had bolstered his confidence; the federal election and the Québec referendum. In February, the minority Conservative government under Joe Clark had faltered, and Trudeau's Liberals regained a majority government.²¹ This victory served as a reassurance for Trudeau to continue his constitutional reform efforts and work towards strengthening national unity.²² The second event was a referendum on Québec separatism held in May by the Parti Québécois government under René Lévesque. Sixty percent of the province of Québec had voted to remain part of the Canadian federation, partly because of Trudeau's promise that a No vote meant change.²³ The change he spoke of was the promise to "(bring) home our constitution, with a charter of rights and an amending formula."²⁴ The success of the No side served as a justification for patriation by any means, at least in the mind of Trudeau. The Québec separatist movement had suffered a significant defeat, and Trudeau sought to capitalize on their weakened state. The rejection of the separatists effectively served as permission for Trudeau to continue with his grand vision of national unity. With these two victories following Trudeau into the summer of 1980, he was confident that unilateral action would be supported by Canadians and ruled constitutional by the Supreme Court of Canada. And while it certainly was, unilateral action quickly became unappealing to Trudeau for the sake of national unity, his most fundamental source of motivation.

In late September 1981, the Supreme Court ruled that Trudeau's plan was indeed constitutional. However, there was a second majority opinion filed in the ruling that any unilateral action would be "unconventional."²⁵ The Supreme Court recognized the political ramifications on regional relationships unilateral action would have. If Trudeau proceeded, federal-provincial relations would be severely damaged for years to come. Trudeau, too, recognized that proceeding unilaterally at this stage would seem to be "defying the judgement of the court by simply proceeding with what a majority had said was contrary to convention."²⁶ As the Supreme Court advised, a solution to achieve patriation was the consent of a substantial number of provinces in order to satisfy constitutional convention. This Patriation Reference, as it was called, essentially forced Trudeau to re-enter negotiations with the provinces in order to proceed with patriation while maintaining national unity. However, the constitutional negotiations that followed in November 1981 would not be as easy as the Conference a decade earlier in Victoria. Trudeau now faced

¹⁹ McWhinney, *Canada and the Constitution 1979-1982*, 78.

²⁰ English, *Just Watch Me*, 479.

²¹ Gordon Robertson, *Memoirs of a Very Civil Servant: Mackenzie King to Pierre Trudeau* (Toronto: University of Toronto Press, 2000), 315, <https://www-deslibris-ca.ezproxy.macewan.ca/ID/418072>.

²² Robertson, *Memoirs of a Very Civil Servant*, 322.

²³ Robertson, *Memoirs of a Very Civil Servant*, 323.

²⁴ Trudeau, *Memoirs*, 283.

²⁵ McWhinney, *Canada and the Constitution 1979-1982*, 81.

²⁶ Trudeau, *Memoirs*, 316.

the so-called Gang of Eight, eight provincial premiers who vehemently opposed the division of powers that Trudeau's patriation plan outlined.²⁷

The Gang of Eight developed from the Gang of Six that formed in 1981 amongst the premiers who filed with their Courts of Appeal, hoping to halt Trudeau in his attempt to unilaterally patriate the Constitution. Québec's René Lévesque was the primary figurehead of the group, with Manitoba's Sterling Lyon and Alberta's Peter Lougheed leading as well.²⁸ Prince Edward Island, British Columbia, and Newfoundland filled out the rest of the ranks, while Nova Scotia and Saskatchewan joined later in the Fall. It was an "unholy alliance of mutually incompatible personalities, with quite disparate political, social, and economic interests" only bound together by their dislike of Trudeau and his patriation program.²⁹ Their ultimate goal was to protect the autonomy of their provinces. They worried that Trudeau would use patriation and constitutional amending to override provincial jurisdiction, especially in areas covered by a charter of rights. They would remain united when entering negotiations in Ottawa on November 2, 1981, but their tense alliance would fall apart within three days as Lévesque effectively abandoned his allies for a proposal made by Trudeau. While all of the dissenting premiers sought to guard their provincial autonomy as much as possible, Québec's position in relation to the federal government was the most unique. It's culture and governing systems differed the most from the rest of Canada, and thus Lévesque was in a more complicated position when entering intergovernmental negotiations. Simply put, Québec was more of an outlier in Canada's constitutional arrangement and thus their position warrants special attention. Ultimately, Lévesque was determined to ensure Québec's unique position in Canada was not undermined during the final negotiations regarding patriation held in the nation's capital.

The Ottawa Conference was the culmination of constitutional talks. The Gang of Eight entered negotiations determined to protect their provincial autonomy, while Trudeau retained his determination to strengthen national unity. The Gang of Eight's championed proposal to protect their autonomy was dubbed the Vancouver formula. This was a constitutional amendment formula proposed by the provincial leaders that provided an alternative to the Victoria formula established in 1971.³⁰ The most substantial facet of the Vancouver formula was the allowance of dissenting provinces to opt-in or out of any constitutional amendments if they infringed on provincial jurisdiction. Trudeau's rejection of this initial proposal was yet another reason he wanted to proceed unilaterally in the Fall of 1980.³¹ At the beginning of the negotiations, the federal government even outlined that the ability to opt-out of a constitutional amendment permitted "incremental separatism" and argued heavily in favour of something like the Victoria formula.³² Once again, Trudeau showed his hand that national unity was at the heart of patriation, and patriating the Constitution incorrectly, as he saw it, would reinforce separatism and lead to the break-up of Canada.

²⁷ Polk, "The Politics of Patriation," 9.

²⁸ McWhinney, *Canada and the Constitution 1979-1982*, 92.

²⁹ McWhinney, *Canada and the Constitution 1979-1982*, 92.

³⁰ Constitutional Conference, 1981, *Federal-Provincial Conference of First Ministers on the Constitution* (Ottawa: November 2-5 1981), 7, <https://primarydocuments.ca/wp-content/uploads/2018/07/1stMinConfVerb1981Nov2.pdf>.

³¹ McWhinney, *Canada and the Constitution 1979-1982*, 97.

³² Constitutional Conference, 1981, *Federal-Provincial Conference of First Ministers*, 7.

The amending formula was the most effective way sought out by the premiers to protect their provincial autonomy. Subsequently, they did achieve an amending formula that included what would become Section 33 of the Canadian Charter of Rights and Freedoms, also known as the notwithstanding clause.³³ This mechanism allowed the provinces or federal Parliament to temporarily opt-out of certain sections of the Charter of Rights and Freedoms. This compromise was certainly not what Trudeau wanted, but as he said, "sometimes you have to take second best."³⁴ He was willing to compromise to strengthen national unity and achieve patriation. Unfortunately, this same compromise partly led to the exclusion of Québec from the renewed Constitution. It began with René Lévesque's effective abandonment of the Gang of Eight, which allowed Trudeau and his Minister of Justice, Jean Chrétien, to negotiate with the rest of the provinces for the final amendment formula.

While the Gang of Eight entered the November negotiations a somewhat disjointed but cohesive group, it fell apart on November 4. René Lévesque had been prepared to give up a Québec veto as a bargaining chip in order to satisfy Trudeau's offer of putting the constitutional amending formula and charter of rights proposals to the nation as a referendum.³⁵ While the two never made a formal agreement to break the constitutional deadlock, Lévesque had broken ranks, and the Gang of Eight effectively fell apart. This in itself was not enough to alienate Québec, but the negotiations that followed on the night of November 4 certainly were. All the other premiers spent the evening negotiating what would become the final patriation package with Trudeau and would be announced on November 5, much to the surprise of Lévesque, who had not been part of the negotiations.³⁶ The highlight of the November 4 negotiations, and the sharpest insult to Lévesque, was dubbed the Kitchen Accord. This was the foundation for the Constitution Act, 1982 that had been developed by Minister of Justice Jean Chrétien and the Attorneys General of Ontario and Saskatchewan, Roy McMurty and Roy Romanow, respectively.³⁷ The three negotiated a patriation package designed to "bridge the divide between the federal government and the Gang of Eight."³⁸ It included a modified version of Trudeau's charter with the notwithstanding clause and other protections for provincial autonomy. After the Kitchen Accord was signed, the agreement was seen to produce "one winner: the country."³⁹

René Lévesque, however, was the only loser in these circumstances. The Québec delegation was staying at the Auberge de la Chaudière in Hull, across the Ottawa River.⁴⁰ The other provincial delegates were all within a short distance of the Château Laurier, and were therefore able to stay late and negotiate the Kitchen Accords. Lévesque had felt betrayed and "all alone," as he was never informed nor consulted during the negotiations.⁴¹ His exclusion from the negotiations was seen as an insult, and as a result, he was the only First Minister not to sign the

³³ Constitutional Conference, 1981, *Federal-Provincial Conference of First Ministers*, 90.

³⁴ Trudeau, *Memoirs*, 324.

³⁵ McWhinney, *Canada and the Constitution 1979-1982*, 93.

³⁶ McWhinney, *Canada and the Constitution 1979-1982*, 9-94.

³⁷ Marilou McPhedran, Judith Erola, and Loren Braul, "28 – Helluva Lot to Lose in 27 Days: The Ad Hoc Committee and Women's Constitutional Activism in the Era of Patriation," in Patten, *Patriation and its Consequences*, 205.

³⁸ Harder, "Looking Back on Patriation and its Consequences," 7.

³⁹ Peter Mansbridge, "The Kitchen Accord," News Special, CBC Digital Archives (November 5, 1981), <https://www.cbc.ca/archives/the-kitchen-accord-1.3593340>.

⁴⁰ Marguerite Paulin, René Lévesque: Charismatic Leader (Montréal: XYZ Publishing, 2004), 112, <https://www-deslibris-ca.ezproxy.macewan.ca/ID/413258>.

⁴¹ Pauline, René Lévesque, 112.

agreement produced on November 5.⁴² The night of November 4 is remembered in Québec as the “Night of Long Knives” to signify the alleged betrayal of Lévesque and Québec by Trudeau and the other premiers.⁴³ As a result, Canadian patriation was achieved without Québec’s signature. While Trudeau had never intended to alienate Québec further through patriation and constitutional reform, he was not willing to compromise any further at the expense of national unity to accommodate Québec’s self-determinism. So, Trudeau emerged victorious and championed his victory of bringing the Constitution home with his charter of rights.⁴⁴ Nine out of the ten provinces were able to stand united under a renewed Constitution and charter of rights.

Pierre Trudeau believed that national unity was accomplished by patriation, even though Québec had not formally signed on. The statistics Trudeau had seen showed that only one-third of Québécois supported Lévesque’s refusal to sign the constitutional accord.⁴⁵ Furthermore, when the final constitution resolutions were brought to the House of Commons, only four out of seventy-five members from Québec voted against them.⁴⁶ So while the Québec government might not have been brought further into the Canadian federation, a majority of its people were or thought they should be. This was enough justification for Trudeau to consider his efforts a success, despite the strong protections for provincial autonomy still enshrined in the patriated Constitution and Charter of Rights and Freedoms.

For the subsequent two decades following patriation, the Constitution and peripheral topics were still discussed and debated at length throughout Canada. The Meech Lake and Charlottetown Accords that were undertaken by Conservative Prime Minister Brian Mulroney in the late 1980s and early 1990s were attempts to bring Québec into Canada’s Constitutional framework. While they were ultimately unsuccessful, such movement at the federal level kept the door open for analysis. By the 1990s, Canadian federalist and constitutional scholars such as Ronald Watts and James Hurley posited that patriation was ultimately achieved via “multilateral executive federalism.”⁴⁷ Executive federalism refers to “the processes of intergovernmental negotiation that are dominated by the executives of the different governments within the federal system.”⁴⁸ In other words, executive federalism means the leaders of different levels of government within a federation collaborate in order to develop certain policies, with minimal interaction with interest groups or the public. The efforts of patriation solidified multilateral executive federalism as the primary method of intergovernmental policymaking in the Canadian context, especially since attempts at unilateral action failed. Patriation continues to serve as one of many instances that demonstrates Canada’s amenability to collaboration despite regional differences. And while perhaps not as strongly as Trudeau had desired, executive federalism captures and promotes the notion of unity throughout the various levels of government in Canada.

⁴² Harder, “Looking Back on Patriation and its Consequences,” 7.

⁴³ Harder, “Looking Back on Patriation and its Consequences,” 9.

⁴⁴ English, *Just Watch Me*, 507.

⁴⁵ Trudeau, *Memoirs*, 327.

⁴⁶ Trudeau, *Memoirs*, 327.

⁴⁷ Hurley, *Amending Canada’s Constitution*, 64.

⁴⁸ Ronald L. Watts, “Executive Federalism: A Comparative Analysis,” Institute of Intergovernmental Relations (Queen’s University, Kingston, ON, 1989), 3.

<https://www.queensu.ca/iigr/sites/webpublish.queensu.ca/iigrwww/files/files/pub/archive/researchpapers/Researchpaper26ExecutiveFederalismWatts.pdf>.

Despite the various protections for provincial autonomy, patriation was a success. Pierre Trudeau had shown a consistent commitment to promoting national unity throughout his time as Prime Minister, and his form of executive federalism is still apparent in the conventional way in which the provinces and federal government interact today. From the failure of the Victoria Charter and the strong resistance encountered to unilateral action, Trudeau compromised and negotiated his way to bring Canada's Constitution home. After an era of Québec separatism and its defeat in 1980, circumstances were as favourable as they had been for a decade to proceed with patriation. While the notwithstanding clause continues to undermine national unity to a certain extent, such a compromise ultimately allowed Trudeau to realize his vision for Canada to a large extent. Despite the various successes of patriation, Québec was undeniably alienated further. Québec separatists had a new wound to exploit during subsequent constitutional negotiations such as the Meech Lake and Charlottetown Accords led by Prime Minister Brian Mulroney. And their exclusion from Canada's Constitution has been used as a justification for Québec's status as a distinct society within Canada for decades. Nevertheless, patriation was achieved from the nationalist values Trudeau had advocated so strongly for since his entry into public life. And like the era of constitutional reform that accomplished patriation, Trudeau's vision was defined and shaped by the vision for a unified Canada.

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