

COALITION

for Gun Control / pour le contrôle des armes

www.guncontrol.ca

Discussion of Bill C-19

Brief to the
Standing Committee on Legal and Constitutional Affairs

March, 2012

Summary

The Coalition for Gun Control is a non-profit organization founded in the wake of the Montreal Massacre. Its position on firearms regulation has been supported by over 300 organizations to date. Canada's *Firearms Act* is an important piece of our national strategy to prevent gun crime and injury and to support law enforcement. Considerable research has shown effective regulation of firearms is linked to reductions in firearms homicide and suicide.

The amendments contained in Bill C-19 will put Canadians' lives at risk. Unlike previous legislation aimed at ending the requirement that individuals register their non-restricted firearms – category of guns that includes rifles and shotguns such as the semi-automatic Ruger Mini-14 used in the Montreal Massacre and sniper rifles, including powerful .50 calibre sniper rifles – this Bill will allow a licenced individual to acquire an unlimited number of guns without even checking if their licence is valid. There will also be no means to know who owns these powerful guns, who sold them or how many are owned. When long guns are recovered in crime, police will not be able to trace them back to their owners, losing an important investigative tool.

Bill C-19 goes far beyond simply repealing elements of the *Firearms Act*, the 1995 legislation; it actually removes critical measures that have been in place since 1977. Bill C-19:

- Makes verifying a firearms purchaser's licence voluntary, which increases the chances unlicensed individuals will be sold rifles and shotguns.
- Erases data on 7.1 million rifles and shotguns currently registered, despite the fact that the data could be useful as an investigative tool for police officers for firearm tracing purpose. Several international treaties require that countries maintain firearm sales records for the purpose of tracing.
- Omits provisions to reinstate the requirement that businesses keep records of sales. This has been a requirement since 1977, and was removed with the *Firearms Act* as the information would be in the registry. Without this information there is no way for police to investigate the source of rifles and shotguns recovered from crime scenes or seized from suspects.
- Destroys a tool widely used by police officers to remove guns from dangerous or suicidal people, enforce prohibition orders and take preventive actions.

Registering all non-restricted firearms to their legal owners one time is key to the effectiveness of our gun control policy.

- Non-restricted rifles and shotguns are used in homicides, suicides and unintentional injury and account for a substantial proportion of firearms recovered in crime, even in large urban centres. They are the guns most often used in suicide, domestic violence and the murder of police officers.
- This is not just an urban issue; the evidence shows clearly that rates of firearm death and injury tend to be higher in areas with more firearms per capita.
- Screening and licensing firearm owners reduces the risks that dangerous people will have access to weapons and registration reinforces licensing, as it holds gun owners accountable for their firearms and reduces the chances that their guns will be diverted to unlicensed owners.
- That link between licensing of firearm owners and the registration of their firearms was affirmed by the Supreme Court of Canada in a unanimous decision on the constitutionality of the *Firearms Act* in 2000.
- Registering firearms helps police enforce prohibition orders and remove guns from dangerous people.
- The gun registry has aided police investigations, including the prosecution of accessories to the murder of four RCMP officers in Mayerthorpe, Alberta.
- In Canada, rates of firearm death and injury have fallen with successively stronger firearms regulation, particularly those focusing on rifles and shotguns, the firearms most often in Canadian homes.
- The costs of maintaining the registration of rifles and shotguns alone have been determined to be less than \$4 million per year,¹ an investment that is dwarfed by the costs of gun death and injury.
- All illegal firearms begin as legal firearms. Controls over legal guns are essential to preventing diversion and choking off the illegal supply.
- Most industrialized countries register firearms. The registry helps Canada meet its international obligations to trace firearms and combat the illegal gun trade.

Recommendations

Relaxing the controls on firearms will put Canadians at risk. The Coalition for Gun Control and its member organizations have publicly opposed Bill C-19's proposed changes. This legislation is not consistent with the Government's stated commitments to crime prevention,² injury prevention³ or suicide prevention.⁴ We believe that if it passes, there will be a substantial increase in the costs of police gun crime investigations and substantial decrease in their success rate. Given the clearly stated objectives of Bill C-19, we see no way to amend the bill to make it acceptable. Hence, considering the serious impact the proposed measures would have on public safety, we recommend that it be defeated at the earliest opportunity. More detailed evidence supporting the efficacy of regulating firearms is contained in the Background section below.

Technical Analysis of Bill C-19

1. Discussion of the Proposed Amendments to the *Firearms Act*

1.1 Provisions on the Repealing the Registration of Non-Restricted Firearms

- Amendments to Criminal Code 91(1), 91(4)(b)(ii), 91(5), 92(1), 92(4)(b)(ii), 92(5) and (6), 94(1), 94(1)(a)(i) and (ii), 94(5), 106(1)(a) and (b), 108(3), 117.03(1) and (2)
- Amendments to the Firearms Act 4(a)(i), 12.1, 23, 26(1), 27, 33(a)(ii), 34(a), 36(1), 44(a), 60, 66, 71(1)(a), 72(5), 83(1)(a) and (b), 88, 105, 112, 114 and 115

These amendments propose to eliminate the need to register "non-restricted firearms" to their legitimate owners. For reasons explained in detail below, we believe this will jeopardize the safety of both the public and the police. Registration of firearms is critical to enforcing the licensing provisions of the law; the Supreme Court of Canada itself has stated that the measures are intertwined:

*"The registration provisions cannot be severed from the rest of the Act. The licensing provisions require everyone who possesses a gun to be licensed; the registration provisions require all guns to be registered. These portions of the Firearms Act are both tightly linked to Parliament's goal of promoting safety by reducing the misuse of any and all firearms. Both portions are integral and necessary to the operation of the scheme."*⁵

These amendments are inconsistent with international treaties to keep records for the purpose of tracing. For example:

- The 2001 ***Program of Action to Prevent, Combat and Eradicate the Illicit Trade in Small Arms and Light Weapons in All Its Aspects (PoA)*** was signed but has not yet been ratified. The PoA requires measures to ensure accurate records are kept for as long as possible on the manufacture, holding and transfer of small arms and light weapons.
- Canada signed the ***Firearms Protocol of the United Nations Convention Against Transnational Organized Crime, Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition [UN Firearms Protocol]*** in 2002, which sets out a legally binding instrument that specifies comprehensive procedures for the identification, import, export, and transit of commercial shipments of firearms, their parts and components, as well as ammunition. However, the Government has repeatedly delayed introducing the regulations needed to implement the Firearms Protocol and has not ratified it. Article 7 of the Firearms Protocol specifies: *"Each State Party shall ensure the maintenance, for not less than ten years, of information in relation to firearms and, where appropriate and feasible, their parts and components and ammunition that is necessary to trace and identify those firearms and, where appropriate and feasible, their parts and components and ammunition which are illicitly manufactured or trafficked and to prevent and detect such activities."*⁶
- The ***OAS Inter-American Convention Against the Illicit Manufacturing of and Trafficking in Firearms (CIFTA)*** was signed in 1997, but Canada is one of the 4 countries among the 35 signatories that have yet to implement it, along with Jamaica, St. Vincent & Grenadines and the US. CIFTA's Article XI on Recordkeeping specifies: *"States Parties shall assure the maintenance for a reasonable time of the information necessary to trace and identify illicitly manufactured and illicitly trafficked firearms to enable them to comply with their obligations under Articles XIII and XVII."*⁷
- Canada signed the 2005 ***UN International Tracing Instrument (ITI)*** that commits states to ensure accurate and comprehensive records are established for all small arms and light weapons within their territory, either by the state or by individuals engaged in manufacturing and trade.⁸ Canada noted in its

2009-2010 report on the progress of the implementation of the ITI that, “*Its legislation requires each firearm to be registered against the manufacturer’s inventory at the time of production or the importer’s inventory at the time of importation and at every subsequent transfer, allowing for a quick, electronic registration query to determine the last legal owner of a firearm at any given point in time.*”⁹

Prime Minister Harper committed at the October 2011 Commonwealth Heads of Government Meeting¹⁰ to “combating proliferation and trafficking of illicit small arms and light weapons,” and to “comply with all obligations arising under international law and urged all countries to become parties to and implement the UN Convention against Transnational Organised Crime and the Protocols.”¹¹ If Canada intends to conform to its international commitments and ratify the Firearms Protocol as well as CIFTA, it would have to repeal Bill C-19 and develop alternative mechanisms that will be more costly and not as effective or comprehensive as the current system.

1.2 Repeal of mandatory licence checks

	Firearms Act (as of December 2, 2009)	Bill C-19 (1st reading version)
Authorization to transfer firearms neither prohibited nor restricted	<p>23. (1) A person may transfer a firearm if, at the time of the transfer,</p> <p>(a) the transferee holds a licence authorizing the transferee to acquire and possess that kind of firearm;</p> <p>(b) the person has no reason to believe that the transferee is not authorized to acquire and possess that kind of firearm;</p> <p><u>(c) the person informs the Registrar of the transfer;</u></p> <p>(d) if the person is an individual and the firearm is a prohibited firearm or a restricted firearm, the individual informs a chief firearms officer of the transfer and obtains the authorization of the chief firearms officer for the transfer;</p> <p><u>(e) a new registration certificate for the firearm is issued in accordance with this Act; and</u></p> <p><u>(f) the prescribed conditions are complied with.</u></p> <p>Notice</p> <p><u>(2) If, after being informed of a proposed transfer of a firearm, the Registrar decides to refuse to issue a registration certificate for the firearm, the Registrar shall inform a chief firearms officer of that decision.</u></p>	<p>11. Section 23 of the Act is replaced by the following:</p> <p>23. A person may transfer a firearm <u>that is neither a prohibited firearm nor a restricted firearm if</u>, at the time of the transfer,</p> <p>(a) the transferee holds a licence authorizing the transferee to acquire and possess that kind of firearm; and</p> <p>(b) the transferor has no reason to believe that the transferee is not authorized to acquire and possess that kind of firearm.</p>
Voluntary request to Registrar		<p>23.1 (1) <u>A transferor referred to in section 23 may request that the Registrar inform the transferor as to whether the transferee, at the time of the transfer, holds and is still eligible to hold the licence referred to in paragraph 23(a), and if such a request is made, the Registrar or his or her delegate, or any other person that the federal Minister may designate, shall so inform the transferor.</u></p>
No record of request		<p><u>(2) Despite sections 12 and 13 of the Library and Archives of Canada Act and subsections 6(1) and (3) of the Privacy Act, neither the Registrar or his or her delegate nor a designated person shall retain any record of a request made under subsection (1).</u></p>
Right of access—subsection		<p><u>25. The Act is amended by adding the following after section 90: 90.1 For the purpose of subsection 23.1(1), the person responding to a request made under that subsection has a right of access to records kept by a chief firearms officer under section 87.</u></p>

Bill C-19 is removing the mechanisms that allow the police to enforce the provisions restricting the sale of long guns to licensed individuals. These provisions mean that despite the fact the infrastructure exists and works, anyone selling a firearm including gun stores will no longer have to check if a buyer's licence is valid before selling non-restricted firearms. Therefore, unlicensed individuals, individuals that are under prohibition order, whose licence has been revoked or who present the seller a counterfeit licence may have the ability to purchase firearms legally if the seller chooses not to ask to see the licence and confirm its validity. There is not even a requirement for the buyer to visually present a licence, which would not be a sufficient safety check

in itself as we know with other types of identification cards – health cards, driver's licences, passports, etc. – they can be counterfeit, and there have already been documented cases of forged firearms licences.¹²

Bill C-19 further includes language on how, if a check is done, there should be no records kept which means that it will be impossible to know if dangerous or forbidden people are, or after a tragedy, were, attempting to buy firearms.

These provisions will have serious impact on public safety and represent a dangerous weakening of the measures proposed in Bill C-391, defeated at committee report stage in September 2010:

(2) Paragraphs 23(1)(c) to (f) of the Act are replaced by the following:

(c) in the case of a transfer to an individual, the transferor verifies the validity of the transferee's Firearms Licence with the Canada Firearms Centre, and obtains a reference number for the inquiry;

The Conservative government has recognized the risk associated with removing mandatory licence checks and maintained the measure in previous bills to abolish the registry, saying that verifying a licence at time of sale “*help(s) ensure that guns do not get into the hands of individuals who should not have them, such as convicted criminals, and (helps) investigators identify the owners of stolen firearms or conduct criminal investigations.*”¹³

The 1998 coroner's inquest into the killing of Arlene May, who was killed by a former partner with a rifle, found that a major flaw in the previous system was that the validity of licenses was not verified. While May's estranged spouse was prohibited from possessing firearms as part of his bail conditions after a previous assault of May, his licence card was not removed from his possession. He used that licence card to purchase the firearm used to kill May and himself.¹⁴ Similarly, the Coroner's inquest into the murder of Laval Police Constable Valérie Gignac reported that despite having a non-valid Firearms Acquisition Certificate (FAC) following a mental illness diagnostic and a prohibition order, the killer was able to purchase a high-power rifle at a gun show without any further screening.¹⁵

Accommodating Sec 23.1(2) will require major changes to the current system and the government has yet to disclose the costs associated with these changes.

1.3 Records of Sale

In 1977, the Criminal Law Amendment Act required businesses to keep records of firearm sales in order to help police trace firearms back to their original owners. That requirement enabled police to trace the perpetrator of the Montreal Massacre in 1989, for example. However, it was repealed in the *Firearms Act* because this information was now to be kept in the centralized registry.

Amending section 23 of the Act repeals a tool that allows police to find out where crime guns come from. The Canadian Association of Chiefs of Police wrote to the Public Safety Minister in May 2011 requesting that this requirement be reinstated in future government bills and that this information be uniformly kept and available to the RCMP Tracing Centre,¹⁶ specifying that the maintenance of firearms records would “*also allow Canada to live up to various international agreements and arrangements to facilitate crime gun tracing, particularly with the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE).*”

	Firearms Act (as of December 2, 2009)	Bill C-19 (1st reading version)
Authorization to transfer firearms	<p>23. (1) A person may transfer a firearm if, at the time of the transfer,</p> <p>(a) the transferee holds a licence authorizing the transferee to acquire and possess that kind of firearm;</p> <p>(b) the person has no reason to believe that the transferee is not authorized to acquire and possess that kind of firearm;</p> <p>(c) the person informs the Registrar of the transfer;</p> <p>(d) if the person is an individual and the firearm is a prohibited firearm or a restricted firearm, the individual informs a chief firearms officer of the transfer and obtains the authorization of the chief firearms officer for the transfer;</p> <p>(e) a new registration certificate for the firearm is issued in accordance with this Act; and</p> <p>(f) the prescribed conditions are complied with.</p>	<p>11. Section 23 of the Act is replaced by the following:</p> <p>23. A person may transfer a firearm <u>that is neither a prohibited firearm nor a restricted firearm if</u>, at the time of the transfer,</p> <p>(a) the transferee holds a licence authorizing the transferee to acquire and possess that kind of firearm; and</p> <p>(b) the transferor has no reason to believe that the transferee is not authorized to acquire and possess that kind of firearm.</p>

This provision is a radical change from previous bills put forward by Conservative governments. Previous government Bills (C-21, C-24, S-5) had provisions for business records regulations to be developed to require businesses to maintain records of non-restricted firearms transfers, much like the system that was in place prior to the adoption of the *Firearms Act*, for example the backgrounder issued by the Ministry of Public Safety on Bill C-24 mentioned: *“In addition, as was the case prior to the imposition of the long-gun registry, a requirement for businesses to maintain records of all transactions involving the sale, purchase or disposal of non-restricted firearms will be introduced. This is a measure that will assist police investigators in locating owners of stolen firearms or those used in the commission of a crime.”*¹⁷

The failure to include business recordkeeping provisions in Bill C-19 will make non-restricted firearms entirely untraceable, as neither manufacturers nor dealers are required to keep records. Even the United States requests that merchants keep records of sale.¹⁸ Several international treaties require that countries maintain firearm sales records for the purpose of tracing. It is inconceivable that Canadians would support going back more than thirty years.

Between 1977 and 1998, businesses were issued a RCMP-produced ledger book each year and were to keep, by law, details on their inventory.

An Act to amend the Criminal Code, the Customs Tariff, the Parole Act, the Penitentiary Act and the Prisons and Reformatories Act [Assented to 5th August, 1977]	
Record of transaction in firearms, etc.	103. (1) Every person who carries on a business that includes the manufacturing, buying or selling at wholesale or retail, importing, repairing, altering or modifying or taking in pawn of restricted weapons or firearms shall <i>(a)</i> keep records of transactions entered into by him with respect to such weapons or firearms in a form prescribed by the Commissioner and containing such information as is prescribed by the Commissioner; <i>(b)</i> keep an inventory of all such weapons and firearms from time to time on hand at his place of business; <i>(c)</i> produce the record and inventory for inspection at the request of any police officer or police constable or any other person authorized by regulations made pursuant to paragraph 106.8(a) to enter any place where a business referred to in that paragraph is carried on; and <i>(d)</i> mail a copy of the record and inventory relating to restricted weapons to the Commissioner or to any person authorized by subsection 106.2(5) to issue a permit to carry on the business in accordance with any request in writing made by the Commissioner or any such person.

And in 1978, Order in Council SOR/78-670 specified that these records should be kept for at least 5 years.

DESTRUCTION OF RECORDS AND INVENTORIES

13. The records and inventories that are required to be maintained pursuant to section 103 of the Act may be destroyed after they have been kept for a period of five years.

2. Discussion of the Transitional Provisions of Bill C-19

2.1. Destruction of Current Registry Data

Bill C-19 (1st reading version)	
Destruction of information-- Commissioner	29. (1) The Commissioner of Firearms shall ensure the destruction as soon as feasible of all records in the Canadian Firearms Registry related to the registration of firearms that are neither prohibited firearms nor restricted firearms and all copies of those records under the Commissioner's control.
Destruction of information – chief firearms officers	(2) Each chief firearms officer shall ensure the destruction as soon as feasible of all records under their control related to the registration of firearms that are neither prohibited firearms nor restricted firearms and all copies of those records under their control.
Non-application	(3) Sections 12 and 13 of the Library and Archives of Canada Act and subsections 6(1) and (3) of the Privacy Act do not apply with respect to the destruction of the records and copies referred to in subsections (1) and (2).

When a non-restricted rifle or shotgun is recovered in crime there will be no way to track it to its source. Prior to the *Firearms Act*, police were able to track guns, albeit slowly by checking the records of local gun dealers. Gun dealers were also required to keep records of gun sales and those records could be reviewed to ensure that legal guns were not being sold to gun owners who did not have valid FACs. If this legislation passes, there will be no records through which to trace non-restricted firearms except in those cases where businesses have voluntarily kept records and agree to share those records with police or for which a warrant is obtained. This will create immense opportunities for illegal trafficking. Once again, this change would take us back to the pre-1977 protocols.

The data currently contained in the long-gun registry could still be useful as an investigative tool for police officers for firearm tracing purpose on a national scale. Deleting the data is unnecessary and punitive, and will impede criminal investigations. It has no impact on law-abiding gun owners and has minimal costs associated with maintaining it.

Following pressure by the Quebec government to obtain the records on firearms registered to Quebec firearm owners, the federal government has argued that it could not share the data for privacy concerns. However, Privacy Commissioner Jennifer Stoddart asserted that nothing in the *Privacy Act* prevents it from sharing the data with provincial governments, since the *Act* actually allows the disclosure of personal information, provided it is done through a federal-provincial agreement for the purpose of administering or enforcing any law or carrying out a lawful investigation.¹⁹

3. Discussion of the Proposed Amendments to chapter 8 of the Statutes of Canada, 2003

3.1 Provisions on Import/Export of Firearms

- Amendments to sections 30 and 31 of chapter 8 of the Statutes of Canada, 2003

We have some concerns about the amendments proposed to the importation and exportation regulation. Bill C-19 proposes to modify certain amendments that were part of Bill C-10A assented on May 13, 2003 but which have not yet been brought into force:

13. Paragraphs 40(1)(b) and (c) of the Act, as enacted by section 30 of chapter 8 of the Statutes of Canada, 2003, are replaced by the following:

(b) the individual produces a licence authorizing him or her to possess that kind of firearm;

(c) in the case of a prohibited firearm or a restricted firearm, the individual holds an authorization to transport it and satisfies the customs officer that the individual holds a registration certificate for the firearm; and

14. Section 41 of the Act, as enacted by section 31 of chapter 8 of the Statutes of Canada, 2003, is replaced by the following:

41. An authorization that is confirmed in accordance with paragraph 40(2)(e) has the same effect as a registration certificate for a restricted firearm until a registration certificate is issued for it.

In the past, we have recognized the need for amendments on the importation and exportation of firearms as a way to bring Canada in line with various international agreements regarding marking and tracing firearms as an essential enforcement tool. This helps countries in their efforts to trace weapons flows, prevent the diversion of legal guns to the illegal market and combat their illegal trade.²⁰ Under current international law, states may adopt different weapons marking systems, complicating the identification of the country-of-origin of a weapon. In spite of the gaps in its own firearm legislation, the United States supports the marking and tracing standard. Since the 1968 *Gun Control Act*, it already requires manufacturers to maintain records, which is why they are capable of tracing US firearms used in crime internationally. On November 26, 2010 the Canadian government postponed – for the third time – the implementation of a simple firearms marking requirement which is required under our international obligations,²¹ until at least December 1, 2012.²²

Background

All guns are lethal, and any gun in the wrong hands is dangerous.

All guns are potentially dangerous, and all guns should be regulated. Rifles and shotguns are the guns most likely to be used in domestic violence situations, accidents, and suicides – particularly among youth. They are also the guns most often used to kill police officers. In the last decade, 12 of the 16 police officers killed with firearms were killed with long guns rather than handguns.

Suicides devastate families and communities – particularly where young people are involved. As Prime Minister Stephen Harper has stated:

“Each year, nearly 4,000 Canadians make this same choice [to commit suicide]. Mostly, the experts tell us, it is a decision to end their burden of depression... The science has progressed but we still don't know enough about depression, and less about suicide. But we know this much: depression can strike the sturdiest of souls. It cares not how

*much you have achieved nor how much you have to live for. Severe anxiety and depression are concentrated among men and women in their primary working years, and, most sadly, in their adolescent children.*²³

Suicides attempted with firearms are almost always lethal (93% completion rate). Most firearm deaths in Canada are suicides (69% in 2008). In 1995, 911 Canadians committed suicide with firearms (rate of 3.1 per 100,000); in 2008 it was 518 (rate of 1.55 per 100,000). Suicide is the second most common cause of death in Canada for those between 15 and 34 years old, and the third leading cause for those aged 10 to 14.²⁴ Consequently, a critical dimension of a suicide prevention strategy is to keep firearms away from individuals who represent a risk to themselves and this was explicitly built into Canada's *Firearms Act*.

Experts dealing with suicide, including the Canadian Public Health Association, the Canadian Association of Emergency Physicians, the Canadian Association of Adolescent Health, and the Association québécoise pour la prévention du suicide have maintained that the licensing of gun owners and the registration of firearms are both important parts of an integrated suicide prevention strategy.

Risk factors for suicide and homicide are closely linked; consequently, many homicides, including as many as 50% of domestic homicides involving firearms, end in suicide. Coroners have identified access to firearms as one of the top five or ten risk factors for whether a woman will die in domestic violence situations.²⁵ For example, in Ontario, a province where only 15% of homes have firearms, 55% of the perpetrators in domestic homicides had access to guns. A firearm in the home dramatically increases the risk of death in domestic violence situations. Six public inquests (the death of Jonathan Yeo who killed Nina deVilliers and Karen Marquis, the murder of Kassonde children, the murder of Arlene May, the OC Transpo shooting, the murder of Brian Smith, as well as the inquiry into the murder of Rajwar Gakhal and eight members of her family by her estranged husband) all recommended the licensing of gun owners and registration of guns to reduce the risk of further tragedies.

All illegal firearms begin as legal firearms. Controls over legal guns are essential to preventing diversion and choking off the illegal supply. Rifles and shotguns are also frequently recovered in crime. In communities such as Surrey, BC and the Ottawa and York regions in Ontario, long guns outnumber handguns 2 to 1 in recovered crime guns. Non-restricted rifles and shotguns made up half of the crime guns reported to the RCMP's Firearms Operations and Enforcement Support (FOES) Unit from Jan. through Sept. 2009: 1,006 non-restricted firearms or rifles and shotguns (46%), 514 restricted firearms (23%) and 674 prohibited firearms (31%), totalling 2,194. Even in Canada's large cities, a substantial proportion of guns recovered in crimes are long-guns. Most firearms are not traced but among the firearms that *are*, we see that registered handguns are seldom used but a large portion of the rifles and shotguns used in homicides are. E.g., only 31 (7.3%) of the 422 Canadian firearms homicides between 2003 and 2009 whose weapons could be recovered and traced were committed by registered handguns, while nearly 20% (83) were by some type of rifle or shotgun; and among all the 256 rifles and shotguns used to kill someone that the police could trace in that period, nearly a third were registered.²⁶ Minister Toews reported in March 2011 that 47% (24,246) of the non-restricted firearms seized by public service agencies and reported to the Canadian Firearms Program had been registered at some point.²⁷

Referring to all non-restricted firearms simply as "duck guns" or "family guns" minimizes the threat they can pose to public safety. Not only does the evidence show that this is not the case, but it is also worth noting that many powerful semi-automatic firearms are currently classified as non-restricted firearms including the Ruger Mini-14 used to shoot and kill 14 young women and injure 14 in the Montreal Massacre (and killed 77 in Norway) as well as certain sniper rifles such as the L115A3 and the Steyr-Mannlicher HS50 which can pierce armoured cars and precisely hit a target nearly 2 kilometres away.

While there are more guns in rural areas and the west, there are also higher rates of firearm death and injury, often involving rifles and shotguns.

Areas of Western and rural Canada where gun ownership rates are higher also have higher rates of firearm death and injury. For example, the average firearm death rate for 2004-2008 for Canada as a whole was 2.31 per 100,000, while Manitoba had 3.26 deaths per 100,000; Saskatchewan 3.39; and Alberta 3.28.²⁸ Northern Territories' firearm death rates are the highest: 4.3 per 100,000 in the Yukon; 5.5 in the Northwest Territories; and 16.9 in Nunavut. Northern regions also have high rates of gun ownership and much higher rates of police

reported Firearms-Related Incidents; here is a rank ordering of the five Census divisions with the most firearms offenses per capita in a two-year interval, and how they compare with a few urban areas.²⁹

Ranking	Census division	2007-2008 FIP reported (rate per 100,000)
1.	Churchill and Northern Manitoba, Northern Region, MB	654
2.	La Ronge, SK	637
3.	Virden Area, Westman, MB	418
4.	Swan River, Parkland Region, MB	317
5.	Thompson and North Central Northern Region, MB	312
67.	Montreal, Qc	112
71.	Toronto, ON	109
89.	Greater Vancouver, BC	95

In 2008, the RCMP in rural Alberta noted an increase in the number of gun-related calls.³⁰ In that province, 68% of suicides by firearms are in rural areas.³¹

A study done in the provinces of New Brunswick and PEI on family violence in rural settings found that two thirds of the women indicated the presence of firearms in their home, and said knowing about the firearms made them more fearful for their safety and well-being; it also found women were more likely to express concern for their safety when the firearms owners were not licenced and the firearms were not registered or safely stored.³² On the International Day to End Violence against Women in 2010, 4.5% of the women who sought assistance in Alberta's women shelters reported they had been threatened with a gun.³³ The Alberta Centre for Injury Control & Research wrote, "*We recognize that women in situations of domestic violence are at particular risk of injury or death by long guns in hands of spouses. Saving women from death at the hands of their intimate partner is a key benefit of the long gun registry.*"³⁴

Because of the prominence of firearms (particularly rifles and shotguns) in violence against women and children in rural areas, women's groups from western and rural areas, including the Alberta Council of Women's Shelter, the Ontario Coalition of Rape Crisis Centres, the Provincial Association of Transition Houses and Services of Saskatchewan, the Transition House Association of Nova Scotia, the Regroupement des maisons pour femmes victimes de violence conjugale, the Coalition of Provincial and Territorial Advisory Councils on the Status of Women, and the YWCA Canada have all expressed their support for the licensing of all owners and the registration of all firearms.

Registration is essential to enforcing licensing.

In 1977, changes to the *Criminal Law Amendment Act* required people to get a Firearms Acquisition Certificate (FAC) to acquire firearms, and businesses to keep records of firearms sale, subject to inspection by police. In 1991, C-17 strengthened screening and safe storage requirements. No licence was required to possess any firearm at that point, and only about a third of firearm owners had a valid FAC. As well, police testimony before the Committee noted that without registration it was difficult to enforce the FAC or safe storage provisions of the law. They called for renewable licenses to possess firearms and the registration of all firearms owned, to increase accountability and reduce diversion to unqualified users. Under the old system, an individual could buy an unlimited number of guns over a five year period with little or no accountability because no record was kept of the firearms owned by that individual. These loopholes created a huge potential for straw purchases and for illegal trading. It also gave little incentive for reporting firearm thefts.

Firearm registration allows firearms to be traced to their legal owners. As a consequence it increases accountability and discourages legal gun owners from giving their guns to unlicensed individuals or storing them carelessly. We license drivers but we also register automobiles to encourage drivers to conduct themselves responsibly in their cars, to assist the police in enforcing the law and combating car theft. The same principles apply to firearms.

With the information now available in the registry on what guns are owned by whom, existing safe storage regulations are easier to enforce. Registration also discourages straw purchases (where licensed users buy to distribute to others) and reduces the chances licensed gun owners will give or sell their firearms to unlicensed or prohibited owners. If they do, they are more likely to be caught and held accountable.

Police officers across Canada now consult the gun registry 17,402 times a day,³⁵ to take preventative action or enforce prohibition orders, among other things. While it is difficult to measure prevention, the police have cited a number of examples where they have used the registry to take preventative action. E.g., shortly after the Dawson College shooting, the registry allowed police to remove firearms from a potential copycat.³⁶ Similarly, after a man had reportedly pointed a rifle at a co-worker and threatened to kill him, police searched the registry and confirmed that the suspect had a valid licence with nine long-guns registered, allowing police to recover all of them, along with a quantity of ammunition.³⁷ A total of 4,612 registered firearms were removed from the possession of individuals whose licenses were revoked due to public safety concerns.³⁸

Registration also helps enforce prohibition orders by providing information about the firearms police should remove. Physicians, crisis workers and police have provided anecdotal evidence of specific cases where the registry was useful in removing firearms from potentially deadly situations. Without information about who owns guns and what guns they own, we cannot prevent dangerous people from getting access to guns.

Strong firearm controls reduce the risk that legal firearms will be misused or diverted.

Through the procedure of registering firearms, police are in a position to differentiate between legal and illegal firearms. Without information about who owns firearms legally and the firearms they own, police cannot charge individuals with illegal possession. Registry information is also critical in the investigation and prosecution of firearms offences. The gun registry has provided over 18,000 affidavits to support the prosecution of firearms-related crime.³⁹ For example, two men were identified and convicted as accessories to the murder of four RCMP officers in Mayerthorpe, Alberta, in part because a registered gun was left at the scene of the crime.

Firearms registration also helps reduce the diversion of legal guns into illegal markets and combat the illegal gun trade. Almost 3,000 guns are stolen annually in Canada, by definition ending up in the hands of criminals. In most cases, the firearm used was easily accessible in the home. Firearm registration increases accountability, therefore helping enforce the legal obligation to report lost or stolen guns, and encouraging safe storage, which will help reduce gun theft.

Registration also allows police to trace firearms easily to their rightful owner. Between 1974 and 2008, 40,000 long guns and 33,000 prohibited weapons were stolen from Canadian residences. In 2010, more than 111,000 firearms were in police custody, either for public safety reasons or after criminal use. Of these, 87,000 were long guns.⁴⁰ There are numerous examples of the registry helping to combat the illegal gun trade; for example, in March 2011, a licenced gun dealer from Sainte-Béatrix, QC was criminally charged for illegally selling 63 guns –including long guns– to Montreal street gangs. Police began their investigation after three guns that were previously registered to this individual were used in gang crimes.⁴¹ In December 2010, Sarnia Police apprehended a man suspected in the theft of three guns after an individual tried to register them.⁴²

There is evidence that stronger regulations on firearms contribute to public safety.

Establishing causal relationships between complex factors is difficult. However, firearm deaths in Canada have declined with stricter controls on firearms, particularly with controls on rifles and shotguns, introduced in 1977, 1991 and 1995.

- The rate of death involving guns is the lowest it has been in over 40 years. In fact, nearly 400 fewer Canadians died of gunshots in 2008 (754) compared to 1995 (1,125).
- Public health studies have assessed the impact of the Firearms Act. For example, the Institut de santé publique du Québec has concluded that the Firearms Act has led to 250 fewer suicides and 50 fewer homicides annually in Canada. Studies have concluded that the drop in suicide has not led to an increase in suicide by other means.⁴³ All major suicide prevention groups in the country support the existing law, particularly because it is a preventative tool which has had significant impact.
- Since the long-gun registry and its related requirements for safe storage of guns were introduced, youth suicide rates by firearms have declined in relation to suicide rates by other means. While the rate of suicide by firearm has dropped 48% since 1995, the rate of suicide without firearm has remained stable.

- Rates of robbery committed with firearms have plummeted (-43%) while rates of robbery committed by other means have only decreased by 9%.⁴⁴
- Murders with rifles and shotguns have decreased dramatically, from 61 in 1995 to 36 in 2010. Crime researchers have concluded that stronger controls on firearms were followed by a significant drop in gun homicides and that no tactical displacement to other methods was observed.⁴⁵
- The rate of women murdered with firearms by their intimate partner has decreased by 69% since 1995.
- While rates of homicide without firearms are comparable between Canada and the U.S., rates of homicides with firearms are 6.4 times higher in the U.S.

Dismantling the registration of rifles and shotguns will save about \$4 million a year and increase the costs of police investigations and gun death and injury.

The old system (Bill C-17 in 1991) cost \$50 million annually and was deeply flawed. While setting up the current system cost more than expected, the money spent on the registry is a sunk cost. Going forward, the principal costs are for screening and licensing gun owners, not for registering guns, and those are areas that even the proponents of Bill C-19 say should be maintained or even strengthened. The RCMP estimates that if the registration of rifles and shotguns were discontinued, it would save them less than \$4 million per year.⁴⁶ It will increase the cost of police investigations, however, because essential information in the trail will be lost. Police will be less likely to trace guns to their source and this will compromise their investigations. In addition, it will reduce their ability to take preventative action.

In 2006, the Geneva based Small Arms Survey singled out Canada's gun law for its significant impact on reducing gun death and injury in Canada, and estimated the decrease in gun injuries and gun deaths since 1995 as saving up to \$1.4 billion Canadian dollars a year.⁴⁷ It was estimated that the cost of death and injury in the mid-nineties was \$6.6 billion per year.⁴⁸

Internationally, it is the norm to license gun owners and register all firearms.

Canada's gun control laws have helped reduce the diversion of legal guns into illegal markets and are seen by many to be part of our obligation under specific International agreements as well as international human rights law. The illegal gun trade is fuelled by inadequate regulation of firearms. The United Nations Firearms Protocol⁴⁹ and the *Inter-American Convention against the Illicit Manufacturing of and Trafficking in Firearms, Ammunition, Explosives, and Other Related Materials (CIFTA)*⁵⁰ both require Canada to keep records of firearms transactions. If Bill C-19 passes, Canada will not be able to meet these basic treaty requirements.

The United Nations Special Rapporteur on Human Rights and Small Arms has affirmed that there is no international right to own guns, and that countries which fail to implement appropriate firearms laws to protect their citizens may be failing to meet their obligations under international human rights law.⁵¹ Canada's existing gun control laws are consistent with international norms. Most countries license gun owners and register firearms, as they do in, for instance, the European Union through Directive 2008/51/EC.

Experts and Canadians Support Canada's Firearms Legislation.

There has been a considerable amount of misinformation about the firearms registry, including the misuse of rifles and shotguns, the role of the registration of these firearms and the costs associated with the registration of these firearms. In spite of this, Canadians continue to express their strong support for the current firearms legislation.⁵² Over 100 public safety organizations and experts publicly raised their concerns about the previous Bill C-391 in 2009-10, including the Canadian Association of Chief of Police, the Canadian Police Association, the Canadian Association of Police Boards, the Canadian Association of Emergency Physicians, the Canada Association for Adolescent Health, Canadian Paediatric Society, Canadian Auto Workers, the Canadian Labour Congress, Public Service Alliance of Canada, women's groups, victims, and several other advocacy groups. Considering how Bill C-19 goes much further in weakening Canada's gun control regime than Bill C-391 had proposed, these groups remain understandably concerned.

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- ² Public Safety Canada. "Tackling crime involves effective enforcement, sentencing and corrections, and also means intervening to prevent crime before it happens." <http://www.tacklingcrime.gc.ca/ocom/cr/index-eng.aspx>
- ³ Harper, Stephen. (2010) Speech from the Throne, March 3, 2010. www.speech.gc.ca/eng/media.asp?id=1388 Excerpt: "To prevent accidents that harm our children and youth, our Government will also work in partnership with non-governmental organizations to launch a national strategy on childhood injury prevention."
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- ⁶ Firearms Protocol of the United Nations Convention Against Transnational Organized Crime, Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition http://treaties.un.org/doc/source/RecentTexts/18-12_c_E.pdf
- ⁷ Department of International Law, Organization of American States, Washington, D.C. Inter-American Convention Against the Illicit Manufacturing of and Trafficking in Firearms (CIFTA) www.oas.org/juridico/english/treaties/a-63.html
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- ⁹ *ibid.*, at p. 60.
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the top 10 risk factors; they are available at

www.mcscs.jus.gov.on.ca/english/DeathInvestigations/office_coroner/PublicationsandReports/DVDR/DVDR.html

²⁶ Source: Statistics Canada, Canadian Centre for Justice Statistics, Homicide Survey, as tabulated by Roberto Rocha, *Montreal Gazette*, July 28, 2011, available at www.montrealgazette.com/news/gun-crimes/index.html Between 2003 and 2009, there were 117 homicides committed by long guns or sawn-off rifles or shotguns whose registration status was unknown, because they were not recovered or they could not be traced because they had indiscernible serial numbers, e.g. But for the remaining 256 cases, 83 - or 32% - of the rifles or shotguns the police identified as homicide weapons were registered.

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⁴⁰ Joint Police Association Declaration, April 2010.

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