

**Bill C-71 and its proposed amendments to certain
Acts and Regulations in relation to firearms in
Canada.**

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Introduction

The Canadian Coalition for Gun Control (CGC) respectfully urges the Members of the Standing Committee to focus on the human cost of gun violence and victimization and the opportunities to prevent death, injury and crime, in its deliberations on consideration of Bill C-71 and its proposed amendments to certain Acts and Regulations in relation to firearms in Canada.

A national non-profit organization, the Coalition for Gun Control (CGC) was founded in 1991 to reduce gun death, injury and crime with effective regulation of firearms as a key element in effective strategies. The CGC has been supported by over 300 organizations including police, crime prevention, women's organizations, suicide prevention, public health, community and victims' organizations. It is a founding member of the International Action Network on Small Arms (IANSA) which works to reduce gun violence and combat the illicit trafficking of firearms worldwide. Its research, capacity building and network of experts have played an important role in shaping public policy for almost three decades.

Bill C-71 is an important step forward, reversing measures which have weakened Canada's gun control regime. We support the law but would like to see one small amendment to the licensing provision that will address the broad public safety concerns and we would like you to restore provisions from previous legislation with respect to authorizations to transport (1995) and controls of the sales of unrestricted firearms (1977). We would also like you to consider additional measures to strengthen the identification and reporting of risks as well as data collection to better inform policy making and evaluation.

After decades of reductions in firearms death, injury and crime which have accompanied progressive strengthening of Canada's gun laws, we are seeing concerning trends including proliferation of legal restricted and prohibited weapons (there are now more than 1 million), increased diversion of legal guns to illegal markets, upticks in gun homicide and suicide as well as shootings. While legislation is never fool proof and firearm regulation is only one element of effective prevention strategies, we have seen too many tragedies that might have been prevented by effective implementation of legislation. Health care professionals, victims of violence, women's groups, police and judges have called for action, and polls show the majority of Canadian's agree.

We need you to help strengthen the legislative tools that can help save lives. We also need to refocus attention of the diverse dimensions of the problem of firearms misuse, which extend beyond gang violence to domestic violence, injuries of children, suicide, and political or hate-motivated violence. We need the development and implementation of comprehensive and coherent violence prevention strategies which reduce the risk people who are a threat to themselves or others will get access to firearms.

The Problem: Firearm Death, Injury and Crime

Over the last decade, Canada is one of the only countries in the world that has been moving backwards; the government eroded its controls on firearms while other countries were introducing stronger laws to improve safety and reduce criminal activities. While Canada has a much lower rate of firearm death and injury than the USA, however it compares poorly to other industrialized nations: we are fourth among 22 OECD countries in the rate of firearm death¹.

¹ <https://www.theatlas.com/charts/H1uCbtnwM>

There are now approximately 1000 firearm-related deaths each year in Canada.² The latest statistics released by Statistic Canada show that, in 2016, for the third consecutive year, there was an increase in both the number and rate of firearm-related homicides in Canada.³ There were 223 firearm-related homicides reported, 44 more than the previous year. This represents a rate of 0.61 firearm-related homicides per 100,000 population, the highest rate since 2005.⁴ Shootings have now become the most common method of homicide, surpassing homicide by stabbing and beating.⁵

Access to Firearms, Death and Injury Rates

The link between accessibility of guns and levels of violence has been demonstrated in a number of contexts. Rates of lethal violence correlate with the availability of firearms. When comparing Canada and the United States, the murder rates without guns are roughly comparable, but murder rates with guns are six times higher in the United States (3.0 compared to 0.49 per 100,000) and murder rates with handguns are seven times higher in the United States (2.16 compared to 0.31 per 100,000).

While gun control is often presented as an urban issue, the data show that rates of firearm death and injury tend to be higher in rural communities and the west. Recent data are not available but the patterns have persisted. For 2000-2005 for example the Canadian average firearm death rate was 2.5 per 100,000 compared to Yukon (7.84 per 100,000), Northwest Territories (8.6 per 100,000) and Nunavut (19.76 per 100,000), Manitoba (3 per 100,000), Alberta (3.52 per 100,000), Saskatchewan (3.72 per 100,000) and New Brunswick (4.08 per 100,000).

There is a lack of current more recent data available but the patterns have persisted for many years: provinces with higher rates of firearm ownership have rates of firearm death and injury above the national average. Where there are higher rates of firearm ownership there tend to be higher rates of firearm death and injury driven by domestic violence and suicide. Police officers are also more at risk in rural communities than in large cities of being killed or injured with firearms. And the firearms typically used are unrestricted rifles and shotguns. The licensing provisions must be rigorous and processes in place to prevent individuals who are a threat to themselves or others from gaining easy access to firearms.

Controlling the availability of firearms is fundamental to crime prevention approaches that identify firearms as a facilitator of crime and violence. Situational crime prevention suggests that limiting access can reduce the occurrence and lethality of such crimes. While highly motivated individuals with homicidal intent may find ways to acquire a gun regardless of the laws or other measures in place to reduce access, less-motivated individuals will be denied access to lethal weapons. This is particularly important as impulsivity and ease of access play major roles in preventable suicides and domestic homicides.

Urban Gun Violence

Firearm homicide rates have increased over recent years after significant declines. In 2016,

² *Firearms, accidental deaths, suicides and violent crime: an updated review of the literature with special reference to the Canadian situation*. Ottawa: Department of Justice; 2015. www.justice.gc.ca/eng/rp-pr/csj-sjc/jsp-sjp/wd98_4-dt98_4/p3.html#a34 (accessed 2016 June 29).

³ <http://www.statcan.gc.ca/daily-quotidien/171122/dq171122b-eng.htm> (accessed 2018 May 20).

⁴ *Ibid.*

⁵ <https://www.publicsafety.gc.ca/cnt/cntrng-crm/gn-crm-frrms/index-en.aspx> (accessed 2018 May 20).

there were 223 firearm related homicides, 44 more than the previous year. This represents a rate of 0.61 per 100,000 population, a 23% increase from the rate in 2015 and the highest rate since 2005.⁶ The higher number and rate of firearm related homicides is due to increases in all firearm types, with the exception of sawed off rifles or shotguns. Annual rates vary, Toronto gun murders for 2016 are up almost 60% from 2015 and Saskatoon may be up 50%. Other cities including Ottawa and Regina are reporting increases in gun violence. Statistics Canada analysis of firearms and violent crime in Canada in 2012, found that, “While firearm-related violent crime accounts for a relatively small proportion of all violent crime in Canada, it can have considerable physical, emotional, and psychological effects on those who are victimized, on families, and on communities⁷. As a result, firearm-related violent crime is a significant social concern. In addition, about one in five (21%) firearm-related deaths in Canada is the result of a criminal offence, while the majority (79%) are the result of suicide, accident, or legal intervention.”⁸

Suicide

Most gun deaths in Canada are by suicide (72% in 2009). Suicides attempted with firearms are almost always lethal (93%) and in one third, the gun used belongs to someone else. A critical dimension of a suicide prevention strategy is to keep firearms away from individuals who represent a risk to themselves, an explicit objective of the *Firearms Act*.

Reducing access to lethal means is effective in preventing suicide^{9,10}. In Canada suicide rates have plummeted with the progressive strengthening of gun laws particularly as they affect rifles and shotguns. Gun control plays a critical role in suicide prevention strategy. The use of immediately lethal methods, such as firearms, has an important impact on male suicide rates¹¹. Suicides attempted with firearms have a 93% completion rate.¹² Only two interventions have been empirically demonstrated to be effective in decreasing suicide mortality: mental health treatment and restriction of lethal means.¹³ Building public awareness of the risks associated with access to firearms and using both education and regulation to encourage families and professionals to identify risks and take action and ensuring rigorous screening in licensing is critical to preventing suicide.

Domestic Violence

Legally owned, easily accessible rifles and shotguns are the guns of choice in domestic violence and women’s safety experts and front-line shelter workers have repeatedly said that controlling access to all firearms is crucial to preventing avoidable deaths. Every year in Canada, more than 100,000 women and children leave their homes to seek safety in a shelter. Gun violence is present in many of these cases, taking such forms as intimidation, control and homicide. Studies and coroner inquests have shown that rates of homicide in domestic violence situations

⁶<http://www5.statcan.gc.ca/cansim/a26?lang=eng&retrLang=eng&id=2530002&&pattern=&stByVal=1&p1=1&p2=37&tabMode=dataTable&csid=>

⁷ Hahn, R.A., Bilukha, O., Crosby, A., Fullilove, M.T., Liberman, A., Moscicki, E., et al. (2005). Firearm laws and the reduction of violence: A systematic review. *Annual Journal of Preventative Medicine*, 28(2S1), 40-71.

⁸ Statistics Canada. (2012). *Table 102-0540 - Deaths, by cause, Chapter XX: External causes of morbidity and mortality (V01 to Y89), age group and sex, Canada, annual (number)*, CANSIM (database). (accessed September 10, 2013).

⁹ Xuan Z, Hemenway D. State gun law environment and youth gun carrying in the United States. *JAMA Pediatrics* 2015; 169:1024–31.

¹⁰ Bridges FS. Gun control law (Bill C-17), suicide, and homicide in Canada. *Psychol Rep* 2004; 94:819–26.

¹¹ <https://www.suicideprevention.ca/understanding/suicide-in-canada/> (accessed 2018 May 20).

¹² <http://www.rcmp-grc.gc.ca/pubs/fire-feu-eval/t2a-eng.htm> (accessed 2018 May 20).

¹³ Gold, Liza , “How to reduce risk of suicide by firearms”, *Psychiatric News* March 16, 2018.

increase significantly when there is a firearm in the home. “Long guns” — rifles and shotguns — are the guns most likely to be used in domestic violence situations. Women’s safety experts and front line women’s organizations have repeatedly spoken out on the importance of gun control and the gun registry to protecting women at risk of domestic violence. With stronger controls on firearms, murders of women with guns have decreased dramatically – from 131 in 1991 to 32 in the last year for which there is data. Nevertheless, firearms continue to figure prominently in the cycle of violence against women and children in their homes. Strong licensing provisions are critical to reducing violence against women.

Sources of Firearms that are Misused

Law enforcement officials have warned that the loopholes created by these changes facilitate illegal trafficking and make it harder to prosecute perpetrators of trafficking. Organized crime networks, terrorists and criminals will take the path of least resistance to obtain guns, and it is only a matter of time before these weaknesses are exploited. Now that non-restricted firearms are untraceable, it is much easier for those who want to remain undetected to acquire an unlimited number of guns, including powerful semi-automatics and sniper rifles, without any flags being raised.

In BC. “Historically, most crime guns were smuggled into Canada from the U.S. Over the past three years in B.C., however, approximately 60 per cent were sourced in Canada, according to data from the National Weapons Enforcement Support Team (NWEST). NWEST attributes this trend to changes in firearms legislation in states such as Washington and Oregon requiring recordkeeping at the point of sale for all firearms, which allows tracing to identify a purchaser [and therefore deters illegal sales]. In Canada, there is no national legislation to require record keeping for sales of non restricted firearms. Unlike many American states, sellers need not keep any records of sales or non restricted firearms. Purchasers can re-sell, trade or give away a firearm without keeping records. Without sales records, crime investigators often cannot trace the ownership of crime guns.... The National Weapons Enforcement Support Team reports an increase in the number of legally purchased firearms that were diverted to the illicit market.

A report recently released from the Toronto Police Service shows that for the first time in decades, the majority of handguns recovered in crime in Canada’s largest city originated in Canada not the USA. What does this mean? It is hard to say but it appears that the last decade’s erosion of our gun laws is having a direct and measurable impact. Over the last ten years the number of privately owned restricted weapons in Canada has almost doubled. Since 2004, restricted weapons, principally handguns, in Canada have doubled to 795,854 in 2015 (compared with 384,888 in 2004) and there are now more than 1 million restricted and prohibited weapons (including military assault weapons). There are suggestions that this is the result of less rigorous screening as well as the erosion of the authority of police and firearms officers to apply the law rigorously.

Stringent controls on access to restricted and prohibited weapons and better controls on the sales of unrestricted firearms are critical to preventing the diversion of legal guns to illegal markets.

The Costs of Gun Violence

Being a victim of gun violence is not limited to incidents that result in injury or death and for every crime or injury that is reported to the police, many more are not. Firearms are not only used to kill, they are also used to coerce, intimidate, injure, and subjugate victims. A gun does

not have to be fired to inflict serious psychological damage. Around the world and in Canada, the prominence of firearms used in the cycle of violence against women and children has been repeatedly documented.¹⁴

Gun violence has significant economic and social costs. It is estimated that the cost of death and injury in the mid-nineties was \$6.6 billion per year.¹⁵ A Justice Canada report estimated the cost of gun crime at \$3.1 billion per year, a figure that excludes important costs that researchers could not estimate, such as costs stemming from the effects on the mental health of victims or of those who have lost a loved one, and on community safety.¹⁶ This estimate also excludes suicides, which are the cause of a large majority of gun deaths in Canada, and unintentional injuries (e.g. accidental discharge of firearms) that place a significant burden on our publicly-funded health care system. In 2006, the 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.¹⁷

Recommendations

The Bill does restore some measures that are important for public safety. For example, extending the period during which risk factors may be assessed beyond the five year period is important. Reinstating the verification of licenses when firearms are purchased is an important measure to ensure that licenses are valid and will help improve public safety by ensuring that people who buy guns are appropriately licensed. Reinstating the authority of the RCMP to manage the classification of restricted and prohibited weapons is important as well but must be accompanied by a commitment to systematically review the current classifications given the gaps that have been exposed in recent tragedies. Restoring controls on sales that were instituted in 1977 should help stem the diversion of legal guns to illegal markets a problem which has escalated dramatically in the Province of British Columbia according noted above. Bill 71 does not reinstate the gun registry but it does transfer the data to Quebec to allow the Province to establish its own.

General recommendations

- Adopt an approach that prioritizes public safety and violence prevention, focusing on the reduction of risk and harm to Canadians;
- Recognize and support those measures in the Bill that strengthen public health and public safety protections, including the verification of licenses, the referral of classification of firearms to the RCMP, the restoration of discretion to the chief provincial firearms officer, providing access to the registry data for the Province of Quebec, and extending the licensing screening period to 10 years;

¹⁴ Graduate Institute of International and Development Studies (2014). *Small Arms Survey 2014: Women and Guns*. Chapter 1, In War and Peace, Violence against women and girls.

¹⁵ Miller, T.R. & Cohen, M.A. (1997) "Costs of gunshot and cut/stab wounds in the United States with some Canadian Comparisons," *Accid. Anal. Prev.* (29): 329-41; abstract at www.ncbi.nlm.nih.gov/pubmed/9183471 as cited in "Reasonable control: gun registration in Canada (Editorial)," *Canadian Medical Association Journal* (CMAJ) February 18, 2003.

¹⁶ Department of Justice Canada: Research and Statistics Division. 2012. *The Economic Impact of Firearm-related Crime in Canada, 2008*. Ottawa: Department of Justice.

¹⁷ Graduate Institute for International Studies Geneva. (2006) *Small Arms Survey 2006: Unfinished Business*. (Oxford University Press, USA), in Chapter 8: "The Instrument Matters: Assessing the Costs of Small Arms Violence." Available at www.smallarmssurvey.org/publications/by-type/yearbook/small-arms-survey-2006.html

- Place special emphasis on securing within the Bill reassertion of the principle that military assault weapons, the misuse of which has extraordinary potential for negative public health and public safety impact, are prohibited for ownership by civilians; and, that classification of restricted and prohibited firearms is updated urgently through Orders in Council based on recommendations from the RCMP and police services experts;
- Broaden the scope of the framing of the Bill to reflect understanding that a coherent and balanced public safety strategy must address not only “gangs and guns” but directly and actively entail measures respecting violence against women, suicide and political violence, including requirements that the RCMP and provincial Chief Firearms Officers enforce the law rigorously to protect the health and safety of women, with specific regard to the checking of references;

Specific Proposal:

The Coalition for Gun Control sees the licensing provisions of the legislation as the foundation to effective firearms regulation and the screening processes associated with this to be fundamental to reducing the risk that individuals who are a threat to themselves or others will get access to firearms. While the existing regulations and forms provide broad scope for assessing risk for domestic violence, suicide, political violence and crime, the proposed criteria in the law are defined quite narrowly and should be amended to align better with the intention of the law which is and has been to ensure that, according to the section entitled “Public Safety”.

(1) Licencing provisions

For example, the wording around licensing could be strengthened by adding working such as:

Public safety

5 (1) A person is not eligible to hold a licence if it is desirable, in the interests of the safety of that or any other person, that the person not possess a firearm.

Criteria

(2) In determining whether a person is eligible to hold a licence under ss (1), a chief firearms officer or, on a reference under section 74, a provincial court judge shall have regard to whether the person, within the previous five years,

o (a) has been convicted or discharged under section 730 of the Criminal Code of

(i) an offence in the commission of which violence against another person was used, threatened or attempted,

(ii) an offence under this Act or Part III of the Criminal Code,

(iii) an offence under section 264 of the Criminal Code (criminal harassment), or

(iv) an offence relating to the contravention of subsection 5(1) or (2), 6(1) or (2) or 7(1) of the Controlled Drugs and Substances Act;

(b) has been treated for a mental illness, whether in a hospital, mental institute, psychiatric clinic or otherwise and whether or not the person was confined to such a hospital, institute or clinic, that was associated with violence or threatened or attempted violence on the part of the person against any person; or

(c) has a history of behaviour that includes violence or threatened or attempted violence

This section should be amended to **ADD (d) or for any other reason is considered a threat to themselves or others.**

This will specify that a broader range of issues or circumstances may be considered, including but not limited to the concerns of a spouse or family member, and that references are contacted.

Controls on handguns, restricted and prohibited weapons

Handguns and other restricted weapons are deemed to be particularly dangerous because of their concealability or fire power and therefore are subjected to additional controls. Handguns are not used for hunting nor are they used by farmers to protect their livestock from predators. Not only should restricted weapons permits be issued only after careful assessment of the legitimate purposes claimed by the applicant (livelihood, member of a shooting range, bona fide gun collector) but their movements should be carefully controlled to reduce the chances of misuse, theft or diversion.

Ensure the controls on handguns as restricted and prohibited weapons are reinstated through the restoring of strict issuance of Authorizations to Transport (ATT). Previous legislation allowed restricted and prohibited weapons to be transported between two or more defined locations; this was amended to issue ATTs allowing them to be transported to any gun club or range in the owner's province of residence, with no compensating measures to check proliferation or mitigate the risk of diversion. Restricted and prohibited weapons need to be strictly regulated and should only be transported between pre-defined locations.

Controls on sales of unrestricted firearms

It is critical that this legislation restore controls respecting the sale of rifles and shotguns that were in place in 1977 requiring the licensed firearms dealer to record the Firearms Acquisition Certificate (now License) number, make model and serial number of firearms, and subject these records to annual inspection. These provisions enabled police to inspect records as needed to trace firearms without additional authorization while requiring a warrant for more in depth investigations for example when conducting a criminal investigation of a firearms dealer.

Other Measures

Other measures which are important to public safety which should be addressed through this legislation or other means:

- Owners of multiple firearms present an increased risk to public safety because of the potential for theft and diversion. Therefore they should be subject to higher levels of scrutiny – for example safe storage inspection with notice of collections of more than 25 firearms. We also recommend that the Committee consider introducing mechanisms to track stockpiling;
- Require health care professionals and others to report to the RCMP or provincial Chief Firearms Officers individuals who are a threat to themselves or others and who should not have access to firearms paralleling current provincial legislation on drivers' licenses;
- Extend the mandatory reporting by health care professionals of firearms injuries, for example which is in place in some provinces, to a national reporting requirement;

- Restore transparent firearms data collection and analysis, evidence based policies and public education about the public health and public safety risks of firearms;
- Establish requirements for investment in youth and primary prevention services, and services for victims of gun violence and their families; and,
- Provide appropriate mechanisms to address non-powder firearms which are a significant threat particularly to children

Public Opinion and the Right to be Safe

We believe that the legislation should be formulated based on the evidence that reducing the risks associated with firearms helps prevent lethal violence, injury and crime. Most of the arguments that we have heard against stronger gun control in recent months are not founded in evidence but on concerns about resistance and opposition, particularly in rural areas and the west. Several points warrant mentioning. First as we have indicated, rates of firearm death and injury are higher where there are more firearms. Second, women's groups across the country along with public health professionals, particularly in smaller communities, support the law because they are aware of the risks associated with firearms. Third, the gender dimensions of this issue are profound. Even when the majority of Canada's 2 million or so gun owners opposed stronger legislation, two thirds of women living with gun owners supported it. Fourth, while most Canadians are not active on this issue, public opinion is firmly in support of stronger laws in virtually every corner of the country in successive polls even if they are not the people writing and calling.

A national survey conducted online by Hill+Knowlton Strategies (H+K) showed that gun control is still a key issue for centre-left voters. There are more Canadians who think that the country's regulations around licensing and access to firearms are not strict enough (47 percent) than there are who say the current regime is either about right (31 percent) or too restrictive (8 percent). 50 percent of Canadians who support the Liberal Party (federal political party support) consider that the country's regulations around licensing and access to firearms are not strict enough. A strong majority (88 percent) supports, "stricter licensing requirements and background checks to prevent people with a history of violence or mental illness from getting access to firearms." A stark 83 percent of Canadians supports a ban on "personal possession of military assault weapons and sniper rifles by civilians." 80 percent of Canadians support "creating a national database tracking all gun sales"; 67 percent of Canadians living in rural communities support it.¹⁸

Most Canadians would support a complete ban on handguns, including many gun owners, why then are we not reinstating the strongest possible controls on handguns and the authorizations to transport? Restricted and prohibited weapons are supposed to be restricted and prohibited.

Regardless of what opponents call it, the restoration of controls that were introduced in 1977 and used for decades does not constitute a "back door registry". Why would we make policy based on false claims and post truth tactics?

¹⁸ The national online survey of 1,138 Canadian adults was conducted by Hill+Knowlton Strategies (H+K) in 2018, between February 9 and February 14. The margin of error for the H+K Strategies survey is +/- 2.9 percent, 19 times out of 20. <http://policyoptions.irpp.org/magazines/march-2018/gun-control-still-a-key-issue-for-centre-left-voters/> (accessed May 23, 2018).

Finally, the Supreme Court has repeatedly emphasized that there is no right to bear arms in Canada and indeed international bodies have reaffirmed the right to be safe as a priority. The UN Special Rapporteur on Small Arms and Human Rights said

*"there is also growing pressure to hold States accountable for patterns of abuse, such as the **State's failure to establish reasonable regulation regarding the private ownership of small arms that are likely to be used in homicides, suicides and accidents**; its failure to protect individuals from a pattern of domestic violence; and its failure to protect individuals from organized crimes including kidnapping and killing for ransom".¹⁹*

And the UN Special Rapporteur on Violence Against Women has said:

A State can be held complicit [where it] condones a pattern of abuse through pervasive non-action ... To avoid such complicity, States must demonstrate due diligence by taking active measures to protect, prosecute and punish private actors who commit abuses"²⁰

About the Coalition for Gun Control

Founded in 1991, supported by more than 200 organizations across the country including health care, violence prevention, victims, policing, labour and community organizations. The Coalition advocates for stronger firearms legislation as part of an integrated strategy to prevent firearms death, injury and crime. It is also a founding member of the International Action Network on Small Arms which address firearm misuse and trafficking globally. It has been broadly recognized for its work and is one of the few civilian organizations to receive the Prix Policiers et Policières de Québec.

Since 1990, Wendy Cukier has been a volunteer with the Coalition for Gun Control. She is coauthor of *The Global Gun Epidemic: From Saturday Night Specials to AK 47s* published by Praeger, as well as peer reviewed articles published in *Peace Review*; *Current Opinion in Psychology*, *International Journal of Law, Crime and Justice*, *Criminology and Criminal Justice*, *Canadian Journal of Criminology & Criminal Justice*, *International Journal of the Sociology of Law, Medicine, Conflict and Survival*, *The Brown Journal of World Affairs*, *Medicine and Global Survival*, *Criminologie*, *Canadian Criminal Law Review*, *Development*, *Canadian Foreign Policy*, *Chronic Diseases in Canada*. She has been a member of the Ad hoc Crime Prevention Council, the Canadian Firearms Advisory Council, the Canadian Small Arms Advisory Council and has served as an advisor internationally to countries including Mexico and South Africa. She was a member of the Canadian Association of Chiefs of Police Quality Assurance Committee and has a long history of volunteer work, currently serving as Chair of the Board at Women's College Hospital in Toronto as well as on the Canadian Women's Foundation, Consultative Committee and much more.

She holds a PhD in Management Science and her academic career spans more than 30 years as a faculty member and researcher at Ryerson University in Toronto where she recently completed a successful term as the Vice President of Research and Innovation and has led many large and rigorous research projects. She teaches research methods in both the Ted Rogers School of Management and in the PhD Program in Public Policy and Administration. She is also the founder and Director of the Diversity Institute. Her expertise on gender plus analysis, diversity and inclusion policies and practices is internationally recognized

She has received widespread recognition for the work on gun control including; YWCA Women of Distinction, Canadian Criminal Justice Association, Public Education Award, Award of Merit, Canadian Public Health Association, and received a Civilian Commendation from the Ottawa Police Services. She is also a recipient of the Harry Jerome Diversity, was named One of Canada's Top 25 Women of Influence and a Women of Influence Diversity Champion, Bob Marley Award, City of Toronto, 25 Transformational

¹⁹ Special Rapporteur on Human Rights and Small Arms (E/CN.4/Sub.2/2002/39; 5/ 2002)

²⁰ Special Rapporteur on Violence Against Women (E/CN.4/1996/53)

Canadians, Globe & Mail. Wendy has received the Governor General's Meritorious Service Cross (MSC), one of Canada's highest civilian honors and was named by the University of Toronto, 100 Alumni Who Shaped the Century. She also holds a Doctor of Laws (Honoris Causa), Concordia University and a Doctorat d'Universite, (Honoris Causa), Laval University, Faculty of Medicine, Dentistry and Nursing.

Policy Element	Previous Statute <i>Firearms Act</i> (as of Apr 5, 2012)	Current Statute	Bill C-71 Substantive Amendments	Proposed amendment	Brief Description
<p>Authorization to Transport (ATT):</p> <p>Valid for all provincial shooting clubs and ranges should be amended to pre-C-42 state where it required shooting ranges or destination where the firearm would be transported to be specified.</p>	<p>19. (1) An individual who holds a licence authorizing the individual to possess prohibited firearms or restricted firearms may be authorized to transport a particular prohibited firearm or restricted firearm between two or more specified places for any good and sufficient reason, including, without restricting the generality of the foregoing,</p> <p>(a) for use in target practice, or a target shooting competition, under specified conditions or under the auspices of a shooting club or shooting range that is approved under section 29;</p> <p>(b) if the individual</p> <p>(i) changes residence,</p> <p>(ii) wishes to transport the firearm to a peace officer, firearms officer or chief firearms officer for registration or disposal in accordance with this Act or Part III of the <i>Criminal Code</i>,</p> <p>(iii) wishes to transport the firearm for repair, storage, sale, exportation or appraisal, or(iv) wishes to transport the firearm to a gun show.</p> <p>a. 1) to provide</p> <p>(iii) instructions in the use of firearms as part of a restricted firearms safety course that is approved by the federal Minister; or</p> <p><u>(2) Notwithstanding subsection (1), an individual may not be authorized to transport a prohibited firearm, other than a handgun referred to in subsection 12(6.1), under that subsection, except for the purposes referred to in paragraph (1)(b).</u></p>	<p>Firearms Act</p> <p>19 (1) An individual who holds a licence authorizing the individual to possess... restricted firearms may be authorized to transport a particular...restricted firearm between two or more specified places for any good and sufficient reason, including,</p> <p>(a) for use in target practice, or a target shooting competition, under specified conditions or under the auspices of a shooting club or shooting range that is approved under section 29;</p> <p>Target practice or competition</p> <p>(b) 19(1.1) In the case of an authorization to transport issued for a reason referred to in paragraph (1)(a) within the province where the holder of the authorization resides, the specified places must include all shooting clubs and shooting ranges that are approved under section 29 and that are located in that province.</p>	<p>Clause 4(1) of Bill C-71 amends subsection 19 (1.1) of the FA:</p> <p>(1.1) In the case of an authorization to transport issued for a reason referred to in paragraph (1)(a) within the province where the holder of the authorization resides, the specified place must – <u>except in the case of an authorization that is issued for a prohibited firearm referred to in subsection 12(9)</u> – include all shooting clubs and shooting ranges that are approved under section 29 and that are located in that province.</p>	<p>Firearms Act</p> <p>19 (1) An individual who holds a licence authorizing the individual to possess... restricted firearms may be authorized to transport a particular...restricted firearm between two or more specified places for any good and sufficient reason, including,</p> <p>(a) for use in target practice, or a target shooting competition, under specified conditions or under the auspices of a shooting club or shooting range that is approved under section 29;</p> <p>DELETE (1.1) In the case of an authorization to transport issued for a reason referred to in paragraph (1)(a) within the province where the holder of the authorization resides, the specified place must – except in the case of an authorization that is issued for a prohibited firearm referred to in subsection 12(9) – include all shooting clubs and shooting ranges that are approved under section 29 and that are located in that province.</p> <p>(b)</p>	<p>Restricted and prohibited firearms are supposed to be restricted because of the particular threat they pose to public safety. Authorizations to Transport were introduced to carefully control the movement of restricted and prohibited firearms between specified places. The amendment in C-42 allowed more liberal movement of prohibited and restricted weapons increasing the risk of diversion. Reversel amendment 19 (1.1) introduced in Bill C-42 which allow holders of restricted firearms to have Authorizations to Transport that allow them to transport restricted and prohibited weapons to “all shooting clubs and shooting ranges that are approved under section 29 and are located in that province”</p>

<p>Automatic authorization to transport — licence renewal</p>		<p>19 (2.1) Subject to subsection (2.3), an individual who holds a licence authorizing the individual to possess prohibited firearms or restricted firearms must, if the licence is renewed, be authorized to transport them within the individual's province of residence</p> <p>(a) to and from all shooting clubs and shooting ranges that are approved under section 29;</p> <p>(b) to and from any place a peace officer, firearms officer or chief firearms officer is located, for verification, registration or disposal in accordance with this Act or Part III of the <i>Criminal Code</i>;</p> <p>(c) to and from a business that holds a licence authorizing it to repair or appraise prohibited firearms or restricted firearms;</p> <p>(d) to and from a gun show; and</p> <p>(e) to a port of exit in order to take them outside Canada, and from a port of entry.</p>	<p>(2.1) An individual who holds a licence authorizing the individual to possess restricted firearms <u>or handguns referred to in subsection 12(6.1) (pre-December 1, 1998 handguns)</u> must, if the licence is renewed, be authorized to transport them within the individual's province of residence to and from all shooting clubs and shooting ranges that are approved under section 29. <u>However, the authorization does not apply to such firearms or handguns whose transfer to the individual was approved, in accordance of subparagraph 28(b)(ii), for the purpose of having them form part of a gun collection.</u></p>	<p>Delete</p> <p>(2.1) An individual who holds a licence authorizing the individual to possess restricted firearms or handguns referred to in subsection 12(6.1) (pre-December 1, 1998 handguns) must, if the licence is renewed, be authorized to transport them within the individual's province of residence to and from all shooting clubs and shooting ranges that are approved under section 29. However, the authorization does not apply to such firearms or handguns whose transfer to the individual was approved, in accordance of subparagraph 28(b)(ii), for the purpose of having them form part of a gun collection.</p>	<p>Repeal amendment 2.3 which references transportation of restricted and prohibited weapons within the individual's province of residence, to and from all shooting ranges that are approved under section 29.</p>
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Policy Element	Current Statute	Bill C-71 Substantive Amendments	Proposed Amendment	Brief Description
Eligibility to Hold Licences: General Rules	<p>Public safety</p> <p>5 (1) A person is not eligible to hold a licence if it is desirable, in the interests of the safety of that or any other person, that the person not possess a firearm...</p> <p>Criteria</p> <p>(2) In determining whether a person is eligible to hold a licence under ss (1), a chief firearms officer or, on a reference under section 74, a provincial court judge shall have regard to whether the person, <u>within the previous five years,</u></p> <p>(a) has been convicted or discharged under section 730 of the <i>Criminal Code</i> of</p> <p>(i) an offence in the commission of which violence against another person was used, threatened or attempted,</p> <p>(ii) an offence under this Act or Part III of the <i>Criminal Code</i>,</p> <p>(iii) an offence under section 264 of the <i>Criminal Code</i> (criminal harassment), or</p> <p>(iv) an offence relating to the contravention of subsection 5(1) or (2), 6(1) or (2) or 7(1) of the <i>Controlled Drugs and Substances Act</i>,</p> <p>(b) has been treated for a mental illness, whether in a hospital, mental institute, psychiatric clinic or otherwise and whether or not the person was confined to such a hospital, institute or clinic, that was associated with violence or threatened or attempted violence on the part of the person against any person; or</p> <p>(c) has a history of behaviour that includes violence or threatened or attempted violence...</p>	<p>Clause 2 of Bill C-71 replaces subsection 5(2) by the following:</p> <p>Criteria</p> <p>(2) In determining whether a person is eligible to hold a licence under subsection (1), a chief firearms officer or, on a reference under section 74, a provincial court judge shall have regard to whether the person [deletes time restriction]</p> <p>(a) has been convicted or discharged under section 730 of the <i>Criminal Code</i> of</p> <p>(i) an offence in the commission of which violence against another person was used, threatened or attempted,</p> <p>(ii) an offence under this Act or Part III of the <i>Criminal Code</i>,</p> <p>(iii) an offence under section 264 of the <i>Criminal Code</i> (criminal harassment), or</p> <p>(iv) an offence relating to the contravention of subsection 5(1) or (2), 6(1) or (2) or 7(1) of the <i>Controlled Drugs and Substances Act</i>;</p> <p>(b) has been treated for a mental illness, whether in a hospital, mental institute, psychiatric clinic or otherwise and whether or not the person was confined to such a hospital, institute or clinic, that was associated with violence or threatened or attempted violence on the part of the person against any person; or</p> <p>(c) has a history of behaviour that includes violence or threatened or attempted violence...</p>	<p>Clause 2 of Bill C-71 replaces subsection 5(2) by the following:</p> <p>Criteria</p> <p>(2) In determining whether a person is eligible to hold a licence under subsection (1), a chief firearms officer or, on a reference under section 74, a provincial court judge shall have regard to whether the person</p> <p>(a) has been convicted or discharged under section 730 of the <i>Criminal Code</i> of</p> <p>(i) an offence in the commission of which violence against another person was used, threatened or attempted,</p> <p>(ii) an offence under this Act or Part III of the <i>Criminal Code</i>,</p> <p>(iii) an offence under section 264 of the <i>Criminal Code</i> (criminal harassment), or</p> <p>(iv) an offence relating to the contravention of subsection 5(1) or (2), 6(1) or (2) or 7(1) of the <i>Controlled Drugs and Substances Act</i>;</p> <p>(b) has been treated for a mental illness, whether in a hospital, mental institute, psychiatric clinic or otherwise and whether or not the person was confined to such a hospital, institute or clinic, that was associated with violence or threatened or attempted violence on the part of the person against any person; or</p> <p>(c) has a history of behaviour that includes violence or threatened or attempted violence...</p> <p>ADD (d) is considered a threat to themselves or any other person.</p>	<p>Restore the broad scope and discretion for determining risks that “it is not in the interests of the safety of that or any other person, that the person possess a firearm” commensurate with the intention of the legislation and evidence of the risk factors.</p>

Policy Element	Bill C-51, 1977	Current Statute	Bill C-71 Substantive Amendments	Proposed Amendment	
<p>Record Keeping by Businesses Conditions – licence issued to business</p>	<p>s 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 a) Keep records of transactions entered into by him with respect to such weapons or firearms in a form or prescribed by the Commissioner and containing such information as is prescribed by the Commissioner b) Keep an inventory of all such weapons and firearms from time to time on hand at his place of business c) 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 para 106.8(a) to enter any place where a business referred to in that paragraph is carried on; and d) mail a copy of the record and inventory relating to restricted weapons to the Commissioner or to any person authorized [...] to issue a permit to carry on the business in accordance with any request in writing made by the Commissioner or any such person</p>	<p>The provision was eliminated with C-68 and not restored when the registration of long guns was discontinued.</p>	<p>Clause 7 of Bill C-71 creates the following after section 58: 58.1(1) A chief firearms officer who issues a licence to a business shall attach the following conditions to the licence: (a) the business must record and keep the prescribed information that relates to the business' possession and disposal of non- restricted firearms; (b) the business must record – and for a period of 20 years, from the day on which the business transfers a non-restricted firearm – keep the following information in respect of the transfer: (i)the reference number issued by the Registrar, (ii)the day on which the reference number was issued, (iii) the transferee's licence number, and (iv)the firearm's make, model and type and, if any, its serial number; (c) the business must, unless otherwise directed by a chief firearms officer transfer any records containing the information described in paragraphs (a) and (b) to a prescribed official if it is determined that the business will cease to be a business. (2) The prescribed official shall, (in accordance with the regulations), keep any records it receives from a business.</p>	<p>58.1(1) A chief firearms officer who issues a licence to a business shall attach the following conditions to the licence: a) The business must records and keep the prescribed information that relates to the businesses possession and disposal of non restricted firearms ADD in a form or prescribed by the Commissioner and containing such information as is prescribed by the Commissioner b) the business must record – and for a period of 20 years, from the day on which the business transfers a non restricted firearm – keep the following information in respect of the transfer i)the reference number issued by the Registrar, (ii)the day on which the reference number was issued, (iii) the transferee's licence number, and (iv)the firearm's make, model and type and, if any, its serial number; (c) the business must, unless otherwise directed by a chief firearms officer transfer any records containing the information described in paragraphs (a) and (b) to a prescribed official if it is determined that the business will cease to be a business. (2) The prescribed official shall, (in accordance with the regulations), keep any records it receives from a business. ADD 3) The business must 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 para 106.8(a) to enter any place where a business referred to in that paragraph is carried on; and d) mail a copy of the record and inventory relating to restricted weapons to the Commissioner or to any person authorized [...] to issue a permit to carry on the business in accordance with any request in writing made by the Commissioner or any such person</p>	<p>This is the restoration of the requirements that were introduced in 1977 prior to the introduction of registration for non-restricted firearms This is required for Canada to be in compliance with international obligations and to assist police in tracing firearms, to reduce the risks of diversion. The proposed measures are consistent with requirements currently in place in the USA.</p>