

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Public Safety Canada
Attention: Dialogue on Reducing Violent Crime
269 Laurier Avenue West
Ottawa, Ontario
K1A 0P8

Dear Sir or Madam:

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), the largest non-profit, charitable conservation-based organization in Ontario, with 100,000 members, subscribers and supporters, and 740 member clubs across the province, we have reviewed the survey and backgrounder associated with Reducing Violent Crime: A dialogue on Handguns and Assault Weapons, and submit the following comments.

General

The OFAH is disappointed that a public conversation about “Reducing Violent Crime” has started with “A Dialogue on Handguns and Assault Weapons.” This approach is a reactive political dialogue that focuses too narrowly on one very specific topic and redirects the conversation away from a big-picture and long-term evaluation of what can be done to actually reduce violent crime. Framing the dialogue in this way has created a political referendum about gun control, rather than a constructive discourse about how to be proactive in addressing the root problems leading to violent crime and gun violence.

The dialogue should have started with a broad conversation about identifying vulnerability points. We need to identify and evaluate vulnerabilities contributing to the supply of illegal firearms in Canada, but we also need to look at our justice system’s ability to fully prosecute criminals, as well as deficiencies in our current social framework that limit our effectiveness in preventing violence and organized crime in the first place. We cannot let the idea of a short-term perceived policy fix (e.g. a handgun ban) blind us from the more daunting long-term challenges that must be tackled in order to produce meaningful results for Canadians. By the time we realize a ban on handguns and “assault weapons” has had a negligible impact on public safety we will be that much further behind in starting the necessary conversations.

We acknowledge that Minister Blair was mandated very late in this government’s term, but the 30-day window for public consultation is wholly inadequate to have a meaningful discussion on this topic.

Roundtable

We appreciated the opportunity to participate in the Roundtable hosted by Minister Blair in Toronto in October. There was very good dialogue among important stakeholders about how to reduce violent crime, gun violence, and strategies to reduce the number of illegal firearms in Canada. It was clear from the discussion that there are tangible immediate-, short- and long-term measures that can be taken without impeding the lawful use of firearms by Canadians. In fact, very little of the conversation was actually about a handgun ban. The discussion questions focussed on reducing violent crime and reducing the supply of illicit firearms, and it was established early in the discussions by an overwhelming majority of participants that a handgun ban would not be an effective long-term strategy for either.

Public Safety Canada
November 9, 2018
Page Two

Engagement Paper

First and foremost, we appreciate the background and context information that attempts to educate the public who are not familiar with firearms ownership and use in Canada. This basic information is often missing in firearms policy discussions and only perpetuates an uninformed dialogue about both issues and solutions. There are clear attempts in the engagement paper to clarify and explain the realities of firearm ownership and use in Canada.

The engagement paper states, “Any ban of handguns or assault weapons would primarily affect legal firearms owners, while the illicit market would be indirectly affected as there would be fewer available to potentially divert.” This statement is an indication that a mandate of “examining a full ban on handguns and assault weapons in Canada, while not impeding the lawful use of firearms by Canadians” can go no further than an examination. Any policy that partially or fully bans these types of firearms would, by the government’s own admission in this paper, impede the lawful use of firearms by Canadians.

Although the engagement paper talks about the variability in results of different strategies related to handguns and “assault weapons,” it is important for us to remember that the Canadian shooting/firearm culture is much different from other jurisdictions. Therefore, we should not import solutions. Our firearms policy must be a ‘made for Canada’ approach.

The government needs a “no-ban” plan

Like all law-abiding Canadians, the firearms community wants to see government action that will enhance public safety by curbing violent crime and illegal firearms use. They want to see the government target criminals and illegal use of firearms, as opposed to pulling the easiest policy lever and restricting law-abiding Canadians without actual enhancements to public safety.

The following are the OFAH recommendations for Government of Canada actions to reduce violent crime and keep guns off our streets without putting undue policy burden on law-abiding Canadians:

Target criminals and not law-abiding Canadians

Most importantly, the federal government needs to target criminals and not law-abiding Canadians. There are many actions that can be taken before impeding on the lawful use and ownership of firearms in Canada. The subsequent sections recommend actions that identify current vulnerabilities and strategies to address them.

Identify actual vulnerability points

The federal government needs to fully evaluate the vulnerability points in our legal, policing and social systems that are actually contributing to the broad issues of violence, violent crime, gun violence and the supply of illegal firearms.

Determine the relative contribution of illicit firearm sources

Illicit firearms are generally sourced from cross-border smuggling (mostly from the United States) or diversion from the legal market in Canada from straw purchases or theft. The specific contribution of each source of illicit firearms in Canada is not clear, but is important to know in determining the priority and relative investments that should be made in addressing each potential pathway. The federal government can play a role in facilitating consistency in the definitions and methodology used by policing and firearms agencies when documenting gun violence and illegal firearm activities. This will provide greater resolution about the issues we are facing and help us determine prioritized and targeted solutions.

Public Safety Canada
November 9, 2018
Page Three

Domestically-sourced firearms supply to illicit markets

There is contention about the degree that domestically-sourced firearms contribute to illicit firearms supply and criminal activities. Consistency in information collection should help, but there is a need for the federal government to determine the relative contributions from each source (as described above).

Engage the firearms industry in meaningful discussions

The firearms industry appears very willing to engage in meaningful discussions with government about how any existing retail vulnerabilities (real, not perceived) can be addressed. At the Minister's Roundtable, the industry offered their expertise to help develop creative solutions to tackle real problems. The federal government should directly engage industry to initiate these discussions.

Capacity and coordination of policing and firearms agencies

Activities like straw purchasing of restricted firearms should be identified through the existing registry. It has been suggested that there is not enough capacity, coordination and proper protocols in the system to ensure that large and unusual purchases are flagged and monitored. The federal government must fill this obvious gap.

Social programming

Admittedly, this is not the expertise of the OFAH. That said, there is an obvious need for long-term investment from the federal government in the form of funding and commitment to social programs and policy that will focus on the "upstream" social determinants that lead to violence, gun violence and organized crime.

Make sure our existing tools are used effectively

A handgun and "assault weapon" ban is a drastic policy tool. Before taking such extreme measures, the federal government must ensure our existing tools are being used as effectively as they possibly can.

Coordination and Integration of policing and firearms agencies

This includes better coordination and integration between the Royal Canadian Mounted Police's (RCMP) Canadian Firearms Program, the Chief Firearms Officers (CFO), local police services and industry when it comes to jurisdiction, information sharing, and tools to identify large and unusual purchases (e.g. straw purchasing). There is already a registry system in place that can help minimize the vulnerability of this pathway, but it is currently not being effectively used. The federal government can play a key role by investing in the capacity and facilitating better coordination and integration to make the system function properly.

Justice System

At the Minister's Roundtable it was suggested that our justice system in Canada is failing to effectively prosecute the criminals who are caught, resulting in them getting back out on the streets to potentially re-offend. This is something that needs to be fully examined by the federal government in order to put a plan in place to begin to address any gaps that exist.

The penalties of illegal firearm possession, use and trafficking should be increased to more effectively deter these activities.

Public Safety Canada
November 9, 2018
Page Four

Online Survey

In general, the survey was poorly constructed. The survey introduction talks about the government wanting to hear views on reducing violent crime, but only asks questions about firearms controls. This leads participants to believe that firearms controls must be used to reduce violent crime, and therefore answering “no” to questions about limiting access to handguns or “assault weapons” means that you do not want to reduce violent crime. This is particularly true for those Canadians who do not own, use or understand firearm use in Canada. If the survey participant has not read the background, then they will not have the appropriate context to answer these questions in an informed way.

The survey should have started with more general questions about violent crime in Canada. For example, the survey could start with a question about whether or not an individual is concerned about violent crime. The next question could ask what measures the government should take, using firearms controls as one option. The questions would get more specific as the survey progressed.

Almost every question is flawed in one way or another. Here are a couple of specific examples to illustrate our concerns:

The first question asks “should more be done to limit access to handguns?” Limit access to who? If it is intended to mean limiting access to criminals as opposed to Canadians in general, then the answers would be different depending on the interpretation. Although subsequent questions are more specific, there is still limited context. If Canadians knew there is already a rigorous system in place that requires training, licensing, vetting, registration, and conditions for use and transportation of legal restricted firearms, then they could provide more informed answer

“Assault weapons” by the definition provided in the online survey are already prohibited in Canada, so what more could be done to limit access? This question is misleading and will provide no benefit to the intended dialogue.

The interpretation of these survey results must be done very carefully and in no way be used to develop or rationalize policy on reducing violent crime.

Conclusion

The OFAH does not support a partial or full ban on handguns or any other legal firearms. We implore the Government of Canada to use the many other actions available to reduce the supply of illicit firearms, but perhaps more importantly, tackle the systemic root causes of violence. We have a violence problem in Canada, not a regulation problem. We cannot solve our violence problem with an ill-conceived policy to ban legal firearms. If there is a demand for illicit firearms, then criminals will find a way to supply that demand. It is reasonable for the government to examine all possible short- and long-term strategies to help determine the most effective ways to reduce the supply of illicit firearms (e.g. straw purchasing), but it is unreasonable to start and stop the dialogue with a ban on legal firearms. There are many ways to achieve a reduction in the supply of illicit firearms without impeding the lawful use of firearms by Canadians. Additionally, supply of illicit firearms is arguably a less important issue than the demand for them. If we truly want long-term solutions, then we need to start acting on the social determinants of gun violence and organized crime to reduce the demand. In the end, government action to reduce gun violence must be based on up-front and evidence-based dialogue with the public and key stakeholders.

Yours in Conservation,



Matt DeMille, M.Sc.
Manager, Fish & Wildlife Services

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