

# Government Bill C-19

Brief Submitted to the  
Standing Committee on Legal and Constitutional Affairs  
(LCJC)

## **Prevention Is Key**

by



Association québécoise  
de prévention du suicide

[Quebec suicide prevention association]

1135 Grande Allée West, Suite 230  
Quebec City, Quebec G1S 1E7

March 2012

## 1. Introduction

---

Founded in 1986, the Association québécoise de prévention du suicide (AQPS) [Quebec suicide prevention association] is a not-for-profit group whose mission is to advocate for suicide prevention in Quebec. It is made up of organizations and individuals who wish to take real and effective action to prevent suicide. The objectives of the AQPS include:

- making the public and policy makers aware of the seriousness of the problem;
- promoting measures that will help build a social, political and economic environment that is conducive to preventing suicide and instilling in people a love of life;
- supporting suicide prevention centres and related resources supporting the same cause;
- fostering accountability and coordination among groups and individuals likely to be partners.

The AQPS has more than 140 members throughout Quebec, including 32 suicide prevention centres.

The AQPS is opposed to Bill C-19, more specifically the end of the long-gun registry. We hope the gun registry will be preserved. We are convinced that the firearms registry is needed to prevent suicide and save lives. Since 1995, there has been a significant decrease in the number of suicides by firearm in Quebec. The gun registry, renewable permits for gun owners and background checks, coupled with efforts to raise public awareness of safe gun storage, have been recognized for their major role in the sharp decline in the suicide rate. These measures are set out in the 1995 *Firearms Act*. The firearms registry is an insurance policy that protects gun owners and their families and must be preserved in its current form.

In addition to eliminating the requirement to register long guns, Bill C-19 contains clauses that would not only weaken the rules for checking licences when firearms are purchased but also remove critical measures in place since 1977. A detailed description of these amendments is provided in section 4 of this brief.

## 2. Decrease in suicide

---

Firearms-related deaths are recognized as a major public health problem. Statistics show that the rate of suicide by firearm is lower in countries with tight controls on firearms than in countries with none. In Canada, most firearms-related deaths are suicide.<sup>1</sup> Suicide is a serious problem that affects a large number of Quebecers and other Canadians. Hunting rifles are the most common type of firearm found in homes, and introducing additional controls over rifles has helped reduce the number of suicides. Since 1995, Canada has had firearms control legislation: the *Firearms Act* establishes conditions for buying and storing weapons, puts restrictions on certain types of weapon and provides for a registry of gun owners. Studies in Canada and elsewhere show that firearms have been used less frequently as a suicide method since the *Firearms Act* came into force in 1995. In addition, these measures likely have an impact on homicide and other crimes committed using firearms. Legislation cannot prevent all suicides and crimes, but the added controls have saved many lives, and it would be unfortunate if these gains were to be put in jeopardy.

- Suicide is the cause of more than one in five deaths among Canadians aged 15 to 24.<sup>2</sup>
- In 1995, the year the *Firearms Act* came into force, 329 young Canadians aged 15 to 34 years committed suicide. There were 124 suicides in 2005, a decrease of 63%.<sup>3</sup>
- In Quebec, a drop in the rate of suicide by firearm was first observed in the late 1990s. The rate of suicide by firearm among men declined after more stringent firearms regulations came into force in Canada.<sup>4</sup>
- The number of suicides by firearm in Quebec decreased 60% between 1995 and 2008, from 343 to 137.<sup>5</sup>
- Studies have noted the link between the implementation of gun control, more specifically the *Firearms Act*,<sup>6</sup> and the decrease in the number of suicides by firearm and concluded that the Act has contributed on average to a drop of 250 suicides by firearm and 50 shooting deaths a year in Canada—with no tactical displacement.<sup>7</sup>
- In studies published between 2009 and 2011, the tactical displacement theory was refuted. Decreases in suicide by firearm are not offset by increases in suicide by other means. A suicidal person who does not have a firearm will not necessarily use a different method.<sup>8</sup> It is a matter of minutes between the time a person decides to take his or her life and the time the person acts. Access to a gun is an added element of impulsiveness.<sup>9</sup>
- Since the Act came into force, suicide by firearm among youth has decreased compared with the rate of suicide by other means.<sup>10</sup>

The average number of shooting deaths a year in Canada between 1995 and 1997 was 1,098. The average between 2000 and 2005 was 819.<sup>11</sup> This means there has been an overall decrease of 25.5% in shooting deaths, including suicide, since the *Firearms Act* came into force in 1995.

Quebec has made enormous strides in terms of suicide prevention over the past 15 years, but the suicide rate is still a concern. We have to continue taking all the steps needed to prevent people from taking their own lives.

- In 2009, 1,068 people—830 men and 233 women—committed suicide.<sup>12</sup>
- It is estimated that, on average, a single suicide affects 10 relatives or friends of the deceased.<sup>13</sup>
- What this means is that in 2009 alone an estimated 10,680 people were left to grieve a person who had committed suicide.
- On average, three Quebecers end their own lives each day.
- Men account for 77% of all suicides.
- Exactly 86.7% of men who commit suicide are between the ages of 20 and 65 (see Table 2).<sup>14</sup>

In Quebec, suicide is particularly prevalent among adult men. Suicide—by all methods combined—has been falling steadily for a decade. However, there has been a bigger drop in the number of suicides by firearm or explosives since the *Firearms Act* came into force in 1995. Precisely 35.6% of men who committed suicide between 1981 and 1983 used firearms or explosives. The proportion for the period from 2005 to 2007 was 17.2% (see Table 3).<sup>15</sup>

### 3. Risks associated with access to firearms: no one is safe

---

Applying preventive measures to vulnerable individuals and reducing access to certain methods of suicide are part of a cohesive suicide prevention strategy.<sup>16</sup> Statistics from industrialized countries show a positive correlation between rates of shooting death and firearms ownership. The explanation for this correlation is that a gun in the house increases the risk of suicide,<sup>17</sup> domestic homicide<sup>18</sup> and accidents, particularly among youth.<sup>19</sup> The risk of a person committing suicide in a house is five times higher if firearms are kept in the house. The risk is especially high for adolescents who are around loaded guns that are not stored safely.<sup>20</sup>

- It is not a question of labelling gun owners as criminals. Anyone, from a farmer to a hunter, can have suicidal thoughts. Access to firearms is a potentially fatal risk for a person thinking about suicide and for the person's family. The risk of suicide is five times higher in homes in which firearms are kept.<sup>21</sup>
- Registration plays a key role and makes it possible to remove firearms where there is a known suicide risk. In that case, the firearms registry protects Canadians when they pose a threat to themselves. Law-abiding hunters and farmers are no more immune to depression, compulsive gambling or excessive drinking than anyone else.
- Some people who commit suicide by firearm use a gun that is not theirs. Gun control does not protect the gun owner alone; it protects everyone who lives in the house.
- Attempts to commit suicide using a firearm are fatal 96.5% of the time.<sup>22</sup> It only makes sense that reduced access to firearms should be a vital component of a suicide prevention strategy.
- Suicide is more common in regions where the rate of gun ownership is higher. In Quebec, an urban centre like Montreal has a suicide rate of 10.5 per 100,000 people, compared with 19.8 per 100,000 in the North Shore region (see Table 1).<sup>23</sup>

### 4. The amendments in Bill C-19 and suicide prevention

---

Bill C-19 contains amendments to the *Firearms Act* that would threaten the health and safety of Canadians and Quebecers, and take away useful tools for suicide prevention. In addition to removing the obligation to register unrestricted guns, Bill C-19 includes the following changes:

- Section 23 would make checking firearms licences at the time of purchase or transfer of a firearm voluntary. Currently, purchasers must carry a valid licence and provide their licence number to the gun seller at the time of purchase. The latter must also verify that the licence is valid. Bill C-19 would remove this verification requirement, meaning that someone whose licence has been revoked (but who still possesses it), who is prohibited from owning a gun or who has a counterfeit licence could still obtain firearms. As a result, it would be easier to procure a firearm than to borrow a book from the library.
- Section 23.1(2) states that, if a gun seller voluntarily checks the validity of a licence with the Canadian Firearms Centre, "neither the Registrar or his or her delegate

nor a designated person shall retain any record of a request made under subsection (1).” Under this clause, it would seem impossible to take urgent action if the Canadian Firearms Centre is aware that an unauthorized individual is attempting to purchase a firearm.

- Section 29 would destroy the data on 7.1 million registered long guns. The Privacy Commissioner of Canada, Jennifer Stoddart, has stated that the *Privacy Act* does not prevent the federal government from sharing these data with interested provincial governments.<sup>24</sup> This information is still useful to police officers, who can use it in their investigative work, and that is why the Quebec government is asking for the data on unrestricted firearms owned by Quebecers.

## 5. Recommendation: choose prevention

---

Bill C-19 contains amendments to the *Firearms Act* that will compromise the health and safety of Canadians. In addition to removing the requirement to register unrestricted guns (shotguns and rifles), Bill C-19 would weaken the rules for checking licences when firearms are purchased and destroy the data on 7.1 million registered long guns. The Government of Quebec and the governments of the other provinces should be able to obtain the data in the long-gun registry, because the data registration system was paid for by Canadian and Quebec taxpayers, and they are the true owners of those data. The information is still useful to police officers, who could continue using it in the course of their investigations and enforcement work.

Registering all firearms protects gun owners and their families. Long guns are just as lethal as hand guns when it comes to suicide, so why should they be exempt from registration? The Supreme Court of Canada wrote, “Guns cannot be divided neatly into two categories—those that are dangerous and those that are not dangerous.”<sup>25</sup> What reason is there to suggest that law-abiding gun owners are less likely to flirt with the idea of suicide or that a family member who knows the guns are there is immune from dark thoughts? In those instances, the registry can be used to confiscate guns before it is too late. It also gives police officers access to valuable information before they respond in an emergency. Without the registry, the authorities would not know how many and what type of guns there are in a house.

The firearms registry saves lives by reducing access to guns, encouraging gun owners to be responsible, and giving emergency responders additional tools. Suicide is a serious public health issue in Canada, and especially in Quebec. It is a complex, multifaceted problem. Adding as many protective measures as possible—including reduced access to all types of firearms—is essential if we are to have a cohesive and effective suicide prevention strategy. In Quebec, the group with the highest suicide rate is men between the ages of 35 and 64. We cannot afford to lose this protective tool, which is especially useful for that segment of the population and their families.

On October 4, 2011, the House of Commons passed a motion calling for a national suicide prevention strategy. The motion, introduced by the Liberal Party and its leader, Bob Rae, officially acknowledged the idea that suicide is not just a personal tragedy, but also a serious

public health issue and a political priority. The motion stated that the House of Commons has a duty to work with the provinces and territories to implement and fund a comprehensive national strategy. In that context, Bill C-19 is a contradiction, because it has been shown that gun control is still an effective way of preventing suicide. The national strategy will have to be on the same scale as the problem of suicide and must therefore encompass all effective approaches and practices.

**WHEREAS:**

- the registration of all firearms protects gun owners and their families, and the gun registry fosters compliance with safe storage rules and facilitates the preventive removal (temporary or permanent) of firearms where there is a high risk of suicide;
- gun registration is essential to enforcement of the permit provisions because it makes owners take responsibility, thereby reducing the risk of legally registered guns ending up in the hands of owners who do not have a permit; only through registration can a gun be linked to its owner. This link provides accountability and traceability, which surely makes gun owners and people with the right to own guns realize that they must appropriately exercise that right in order to protect those around them;
- even though registration does not necessarily mean a gun will not be used to commit suicide, adding a combination of controls can help prevent many tragedies; none of the preventive measures that have been considered can claim to stop suicide altogether;
- while it is impossible to say exactly how many suicides the registry has prevented, statistics on the decrease in suicide by firearm since the *Firearms Act* came into force are evidence that the Act is sound and valid. According to the INSPQ, strict firearms control has reduced the average number of shooting deaths a year by 300, including 250 suicides;
- Canada's unrestricted firearms registry is now well established and operational. The current cost of running the registry is relatively low considering the hundreds of lives that have been saved and the costs thus avoided each year since the *Firearms Act* came into force;
- most unrestricted firearms currently in circulation in Canada have already been registered;
- the registry is an invaluable tool for police officers.

**THE ASSOCIATION QUÉBÉCOISE DE PRÉVENTION DU SUICIDE MAKES THE FOLLOWING RECOMMENDATION:**

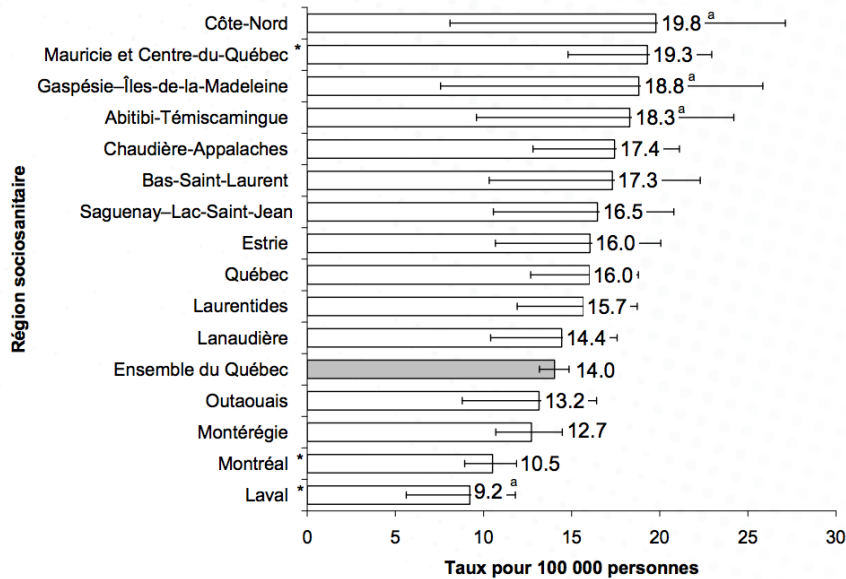
- **Fully preserve the firearms controls that were introduced after the *Firearms Act* came into force, including the requirement that all owners of unrestricted firearms register all of their weapons and the requirement that sellers verify the validity of purchasers' licences at the time of sale or transfer of an unrestricted gun.**
- **Should Bill C-19 pass, the government must launch an awareness campaign to promote safe firearms storage and remind both the public and public health officials and suicide prevention advocates of the importance of informing the authorities**

when they become aware of situations where individuals present a risk to themselves or the public (for example, a risk of suicide, violence or murder).

- Although the government has provided more funding to check the backgrounds of applicants for restricted firearms licences, it is essential to expand this process to all new applicants for firearms licences and, at renewal, to unrestricted firearms.
- The registry currently allows public health officials to take preventive action. In removing this tool, it is critical to provide other mechanisms to avert situations where there is a risk of suicide or violence involving a firearm. For more than 20 years, public health and suicide prevention experts across the country have worked together and with public safety organizations to put an end to misuse of firearms. The AQPS, in keeping with its mission to advocate for suicide prevention, recommends that the members of the Standing Committee on Legal and Constitutional Affairs choose prevention. If we reject Bill C-19, we will be keeping a vital tool that is part of a comprehensive suicide prevention strategy.

**Table 1**

Taux ajusté<sup>1</sup> de mortalité par suicide selon la région sociosanitaire, sexes réunis, 2007-2009<sup>2</sup>



<sup>1</sup> Taux ajustés selon la structure par âge de la population du Québec en 2001.

<sup>2</sup> Données provisoires pour les années 2008 et 2009 provenant de la banque de données des coroners. À interpréter avec réserve.

\* Le taux de la région est significativement différent du taux provincial à un seuil  $\alpha$  de 5 %.

<sup>a</sup> Coefficient de variation supérieur à 16,6 % et inférieur à 33,3 %. La valeur doit être interprétée avec prudence.

Sources : MSSS, Fichier des décès de 2007 et banque de données des coroners 2008 et 2009.  
MSSS, Perspectives démographiques basées sur le recensement de 2006.

### Adjusted suicide mortality rate by socio-health region, men and women combined, 2007–2009

Vertical axis: Socio-health region

Horizontal axis: Rate per 100,000 people

1 Rates adjusted according to the Quebec population's age distribution in 2001.

2 Provisional data for 2008 and 2009 from the coroners' database; interpret with care.

3 This region's rate is significantly different from the provincial rate at an  $\alpha$  of 5%.

4 Upper coefficient of variation is 16.6% and lower is 33.3%; interpret with care.

Sources: MSSS, 2007 death records and 2008 and 2009 coroners' database.

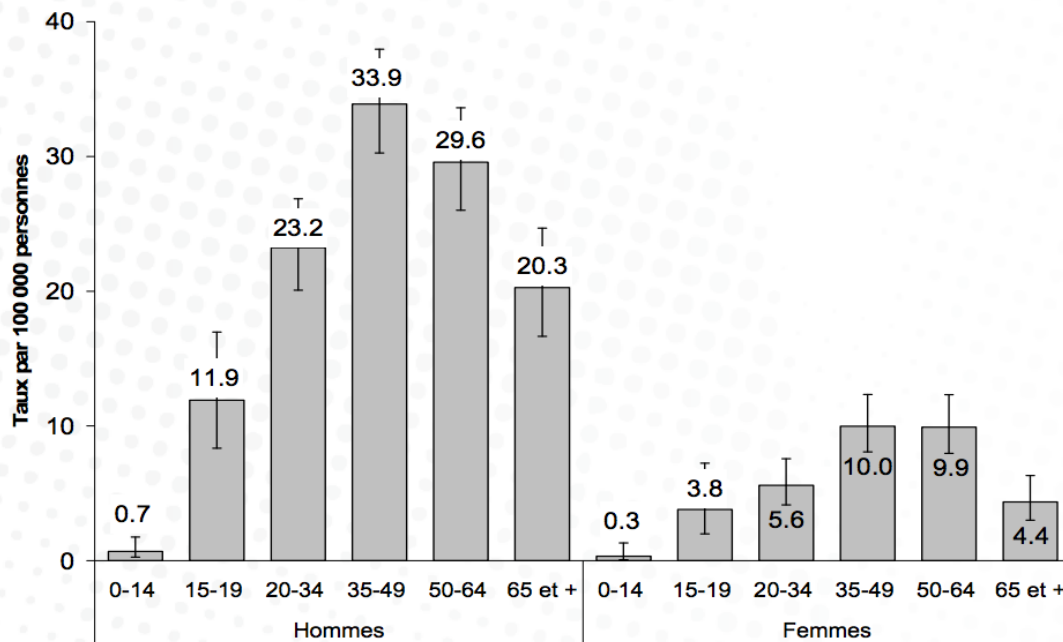
MSSS, Demographic projections based on the 2006 census.

Source: Gagné, M., G. Légaré, P.-A. Perron, D. St-Laurent (2010), "La mortalité par suicide au Québec : données récentes de 2005 à 2008" [Suicide mortality in Quebec: recent data, 2005 to 2008], 2011 update, Institut national de santé publique du Québec, 5 p.



**Table 2**

**Taux de mortalité par suicide selon le groupe d'âge et le sexe, 2007-2009<sup>1</sup>**



<sup>1</sup> Données provisoires pour les années 2008 et 2009 provenant de la banque de données des coroners. À interpréter avec réserve.

Sources : MSSS, Fichier des décès de 2007 et banque de données des coroners 2008 et 2009. MSSS, Perspectives démographiques basées sur le recensement de 2006.

**Suicide mortality rate by age and sex, 2007–2009**

Vertical axis: Rate per 100,000 people  
 Horizontal axis: Men; Women

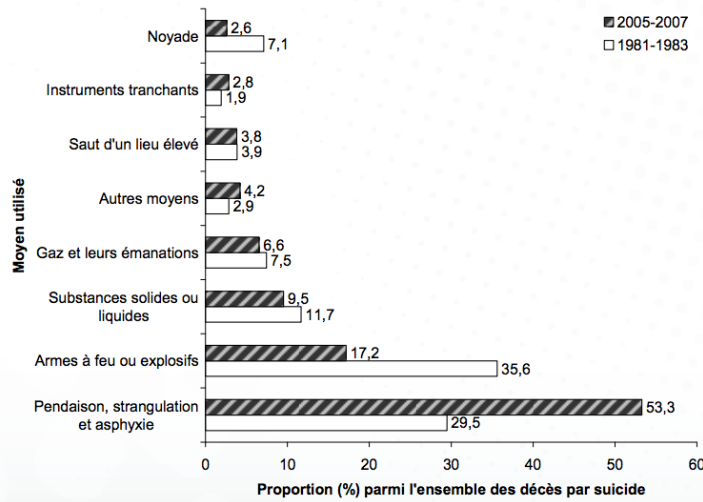
Provisional data for 2008 and 2009 from the coroners’ database; interpret with care.

Sources: MSSS, 2007 death records and 2008 and 2009 coroners’ database.  
 MSSS, Demographic projections based on the 2006 census.

From: Gagné, M., G. Légaré, P.-A. Perron, D. St-Laurent (2010), “La mortalité par suicide au Québec : données récentes de 2005 à 2008” [Suicide mortality in Quebec: recent data, 2005 to 2008], 2011 update, Institut national de santé publique du Québec, 5 p.

**Table 3**

**Répartition des décès par suicide selon le moyen utilisé, hommes, 1981-1983 à 2005-2007**



Sources : MSSS, Fichier des décès de 1981 à 2006 et MSSS, extrait provisoire du Fichier des décès 2007.

**Breakdown of suicide deaths by method used, men, 1981–1983 and 2005–2007**

Vertical axis: Method used

Horizontal axis: Proportion (%) among all suicide deaths

- Drowning
- Sharp objects
- Jump from high place
- Other
- Gas and gas fumes
- Solids or liquids
- Firearms or explosives
- Hanging, strangulation and asphyxiation

Sources: MSSS, Death records, 1981 to 2006.  
MSSS, Provisional excerpt from 2007 death records.

From: Gagné, M., G. Légaré, P.-A. Perron, D. St-Laurent (2010), "La mortalité par suicide au Québec : données récentes de 2005 à 2008" [Suicide mortality in Quebec: recent data, 2005 to 2008], 2010 update, Institut national de santé publique du Québec, 19 p.

- <sup>1</sup> Hung, Kwing, “Firearms Statistics Updated Tables,” January 2006.
- <sup>2</sup> Health Canada, “It’s Your Health: Suicide Prevention,” March 2009, [http://www.hc-sc.gc.ca/hl-vs/alt\\_formats/pacrb-dgapcr/pdf/iyh-vsv/diseases-maladies/suicide-eng.pdf](http://www.hc-sc.gc.ca/hl-vs/alt_formats/pacrb-dgapcr/pdf/iyh-vsv/diseases-maladies/suicide-eng.pdf).
- <sup>3</sup> Hung, Kwing, “Firearms Statistics Updated Tables,” January 2006, Statistics Canada, Mortality, Summary List of Causes 2005, 2009.
- <sup>4</sup> Gagné, M., Y. Robitaille, D. Hamel and D. St-Laurent (2010), “Firearms regulation and declining rates of male suicide in Quebec,” *Injury Prevention*, 16(4), pp. 247–253.
- <sup>5</sup> Hung, Kwing, “Firearms Statistics Updated Tables,” January 2006, Statistics Canada, Mortality, Summary List of Causes 2008, October 2011, <http://www.statcan.gc.ca/pub/84f0209x/84f0209x2008000-eng.pdf>, Quebec coroner’s office.
- <sup>6</sup> Blais, E., M.-P. Gagné and I. Linteau, “L’effet des lois en matière de contrôle des armes à feu sur les homicides au Canada, 1974–2004” [The impact of gun control legislation on homicide in Canada, 1974–2004], *Canadian Journal of Criminology and Criminal Justice*, Vol. 53, No. 1, January 2011; Lavoie, M., R. Pilote, P. Maurice and E. Blais, “Brief Submitted to the House of Commons Standing Committee on Public Safety and National Security Concerning Bill C-391, An Act to amend the Criminal Code and the Firearms Act,” INSPQ, May 2010, [http://www.inspq.qc.ca/pdf/publications/1089\\_MemoireProjetLoiC391ArmesFeu\\_VA.pdf](http://www.inspq.qc.ca/pdf/publications/1089_MemoireProjetLoiC391ArmesFeu_VA.pdf); Gagné, Marie-Pier, “L’effet des législations canadiennes entourant le contrôle des armes à feu sur les homicides et les suicides” [The impact of Canadian gun control legislation on homicide and suicide], Master’s thesis submitted to the Faculty of Graduate Studies, August 2008.
- <sup>7</sup> Lavoie, M., R. Pilote, P. Maurice and E. Blais, “Brief Submitted to the House of Commons Standing House Standing Committee on Public Safety and National Security Concerning Bill C-391, the Act to amend the Criminal Code and the Firearms Act,” INSPQ, May 2010, [http://www.inspq.qc.ca/pdf/publications/1089\\_MemoireProjetLoiC391ArmesFeu\\_VA.pdf](http://www.inspq.qc.ca/pdf/publications/1089_MemoireProjetLoiC391ArmesFeu_VA.pdf).
- <sup>8</sup> Gagné, Marie-Pier, “L’effet des législations canadiennes entourant le contrôle des armes à feu sur les homicides et les suicides” [The impact of Canadian gun control legislation on homicide and suicide], Master’s thesis submitted to the Faculty of Graduate Studies, August 2008; Blais, Étienne, Marie-Pier Gagné and Isabelle Linteau, “L’effet des lois en matière de contrôle des armes à feu sur les homicides au Canada, 1974–2004” [The impact of gun control legislation on homicide in Canada, 1974–2004], *Canadian Journal of Criminology and Criminal Justice*, Vol. 53, No. 1, January 2011.
- <sup>9</sup> Hemenway, D., and M. Miller (2000), “Firearm availability and homicide rates across 26 high-income countries,” *Journal of Trauma-Injury Infection and Critical Care*, 49(6), pp. 985–988.
- <sup>10</sup> Austin, Dr. K., Canadian Pediatric Society, Testimony before the House of Commons Standing Committee on Public Safety and National Security (SECU) on Bill C-391, May 27, 2010.
- <sup>11</sup> Hung, K., (2000), Firearms Statistics, Supplementary Tables. Ottawa: Research and Statistics Division, Department of Justice; Statistics Canada, (2010), Mortality, Summary List of Causes (2006). Ottawa: Statistics Canada.
- <sup>12</sup> Gagné, M., Y. Robitaille, D. Hamel and D. St-Laurent (2011), “La mortalité par suicide au Québec: données récentes de 2005 à 2009” [Suicide mortality in Quebec: recent data, 2005 to 2009], 2011 update, Institut national de Santé publique du Québec, 5 p.
- <sup>13</sup> St-Laurent, D., and M. Gagné, “Surveillance de la mortalité par suicide au Québec : Ampleur et évolution du problème” [Monitoring suicide mortality in Quebec: scope and evolution of the problem], Institut national de santé publique du Québec, 2007.
- <sup>14</sup> Gagné, M., Y. Robitaille, D. Hamel and D. St-Laurent (2011), “La mortalité par suicide au Québec: données récentes de 2005 à 2009” [Suicide mortality in Quebec: recent data, 2005 to 2009], 2011 update, Institut national de Santé publique du Québec, 5 p.
- <sup>15</sup> Gagné, M., Y. Robitaille, D. Hamel and D. St-Laurent (2011), “La mortalité par suicide au Québec: données récentes de 2005 à 2009” [Suicide mortality in Quebec: recent data, 2005 to 2009], 2010 update, Institut national de Santé publique du Québec, 19 p.
- <sup>16</sup> Archambault, J., J. Lane, M. Collins-Poulette and R. Camirand (2010), “Guide de soutien au rehaussement des services en prévention du suicide à l’intention des gestionnaires des centres de santé et de services sociaux” [Support guide on the enhancement of suicide prevention services for health and social services

---

centre managers], Government of Quebec, Communications Directorate, Department of Health and Social Services.

<sup>17</sup> Kellerman, A.L., F.P. Rivara, G. Somes, et al., "Suicide in the home in relation to gun ownership," *N. Engl. J. Med.* 1992, 327, pp. 467–72.

<sup>18</sup> Campbell, J.C., D. Webster, J. Koziol-McLain, et al., "Risk factors for femicide in abusive relationships: results from a multisite case control study," *Am. J. Public Health* 2003, 93, pp. 1089–97.

<sup>19</sup> Grossman, D.C., D.T. Reay and S.A. Baker, "Self-inflicted and unintentional firearm injuries among children and adolescents: the source of the firearm," *Arch. Pediatr. Adolesc. Med.* 1999, 153, pp. 875–8.

<sup>20</sup> Kellerman, A.L., F.P. Rivara, G. Somes, et al., "Suicide in the home in relation to gun ownership," *New Engl. J. Med.* 1992, 327, pp. 467–72.

<sup>21</sup> Canada Safety Council, "Canada's Silent Tragedy" (released January 6, 2004; updated September 2006), <http://archive.safety-council.org/info/community/suicide.html>.

<sup>22</sup> Blais, E., M.-P. Gagné, I. Linteau, "L'effet des lois en matière de contrôle des armes à feu sur les homicides au Canada, 1974–2004" [The impact of gun control legislation on homicide in Canada, 1974–2004], *Canadian Journal of Criminology and Criminal Justice*, Vol. 53, No. 1, January 2011.

<sup>23</sup> Gagné, M., Y. Robitaille, D. Hamel and D. St-Laurent (2011), "La mortalité par suicide au Québec: données récentes de 2005 à 2009" [Suicide mortality in Quebec: recent data, 2005 to 2009], 2011 update, Institut national de Santé publique du Québec, 5 p.

<sup>24</sup> Canadian Press, "Privacy czar shoots down Tory rationale for destroying gun records," November 1, 2011, available online at: <http://www.theglobeandmail.com/news/politics/privacy-czar-shoots-down-tory-rationale-for-destroying-gun-records/article2221326/>.

<sup>25</sup> Supreme Court of Canada, *Reference re Firearms Act (Can.)*, 2000 SCC 31, [2000] 1 S.C.R. 783.