

# PolySeSouvient / PolyRemembers

Étudiants et diplômés de Polytechnique pour le contrôle des armes  
Students and Graduates of Polytechnique for gun control

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Members

Standing Committee on National Security, Defence and Veterans Affairs (SECD)

Senate of Canada

Ottawa, Ontario K1A 0A4

[secd@sen.parl.gc.ca](mailto:secd@sen.parl.gc.ca)

## Re: Clause by clause and final recommendations re Bill C-21

Dear Senators,

We are writing to you as the SECD hearings with witnesses on Bill C-21 have concluded and the clause-by-clause stage of the Senate legislative process [begins](#). We thank you again for the opportunity to testify. However, at this critical time in the process, we wish to reiterate our position on three key areas that are of particular concern to us.

### *Possible amendment weakening freeze on handgun transfers*

The first issue of significant concern is the possibility of a further expansion to the exemption granted to Olympic athletes and coaches in relation to the freeze on new handgun purchases, [as advocated by some witnesses](#) and pondered by [some senators](#). One option is to broaden the exemption to other entities like the International Practical Shooting Confederation (IPSC), the Shooting Federation of Canada (SFC) or generally to all [“organized target shooting sports run by government-recognized sport associations”](#), which would include the International Practical Shooting Confederation (IPSC)<sup>1</sup> that essentially makes a sport out of the “practical” training intended for military, law enforcement and imagined self-defence scenarios.

Amending the bill to further broaden the Olympic exemption risks completely nullifying the freeze on new handgun acquisitions, since Canadian law already essentially limits handgun purchases to target shooters (i.e. members of gun clubs). It would be akin to prohibiting new cars - except for drivers.

Entities involved in handgun shooting have a vested interest in promoting their sport. Their mission is not one of public safety and, consequently, it's only natural that groups like the Shooting Federation of Canada are likely to apply the law and eventual regulations in a way that furthers [their goals, which is the “promotion, development and governance of organized, recreational, and competitive target shooting in Canada.”](#) For example, the BC chapter of IPSC said that if IPSC got an exemption, [“we will become the gateway to handgun ownership in Canada and can expect a huge increase in membership.”](#)

PolySeSouvient as well as the [Concordia University](#), [Dawson College](#), [Quebec Mosque](#) and [Danforth](#)

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<sup>1</sup> IPSC is [described](#) by the US Violence Policy Center as a sport where “competitors conduct their activities over a ‘run-and-gun’ obstacle course where they face a variety of ‘real world’ or ‘practical’ shoot/don’t shoot situations, such as firing at the human silhouette of a ‘hostage taker’ while sparing the ‘hostage.’ Unlike traditional target sports, the weapons used are most often large-calibre pistols, assault rifles, and riot shotguns.”

communities have collectively fought for decades to ban handguns. [Seven out of ten Canadians](#) support a total ban even though everyone knows this would eliminate shooting sports involving handguns. Indeed, this is an integral part of a “total” ban.

The freeze on new handgun transfers proposed by Bill C-21 is far from the ban that our organizations have called for, as it allows approximately [1.3 million handguns](#) to remain in the hands of their private owners who can continue to use them for target shooting. This means that it will take at least three or four generations for handguns to be phased out of circulation in Canada. The measure is a compromise, but we support it because it’s a step in the right direction.

In addition, we feel the Olympic exemption already goes against the spirit of the freeze. There may be justifications to exempt current Olympic and Paralympic athletes who have trained for many years, but exempting those that have never come close to such dedication, or beginners with nothing more than self-proclaimed aspirations to compete with handguns, would create a huge loophole and open the door to widespread abuse. Indeed, anyone can claim to want to, one day, compete in the Olympics. We cannot foresee at this point what the regulation will look like, but the fact will always remain that it is impossible to distinguish between someone who genuinely intends to train for the Olympics and someone who says they will in order to be exempted from the handgun freeze.

According to the RCMP [an average of over 600 handguns](#) are stolen from legal gun owners every year. These, by definition, fall into the hands of criminals. Legal handguns have also been used in many mass shootings<sup>2</sup>, including those that some of us survived. And while long guns have historically been the type of gun most used in domestic murders, [recent statistics](#) (2022) tabled before your Committee indicate that the prevalence of handguns in such contexts has surpassed that of long guns. This may be related to the recent exponential proliferation of handguns in Canada: the number of handguns has almost tripled over the last ten years, from [467,146](#) handguns in 2012 compared to [1,335,700](#) today.

We are therefore somewhat distressed by [the questions](#) posed during the hearings regarding the possibility of amending section 43 to broaden the Olympic exemption, with little or no regard to the consequences on public safety. Expanding the exemption would prioritize the interests of recreational sports shooters who want to buy new handguns over the lives of (highly predictable) future victims of gun violence. It would also cast aside the unequivocal evidence that gender-based violence and intimate partner violence is not only fueled by access to long guns but also handguns. Furthermore, it would negate the long and arduous democratic process that led to the freeze on new handguns in the bill, involving years of advocacy by victims’ groups, unwavering public support and its adoption by the elected members of the House of Commons.

### ***Support for the bill as is, without amendments***

Secondly, having observed and participated in the legislative process in the House of Commons, we feel that - even though the legislation is not perfect nor complete - Bill C-21 contains ground-breaking gun control measures and represents the best we can hope to achieve under the current minority government. In addition, any amendment risks jeopardizing the bill as this would entail sending the bill

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- Valery Fabrikant (Concordia University, 1992, 4 murdered, 1 wounded), known to have trained in a gun club;
- Mark Vijay Chahal (Vernon BC, 2005, 9 murdered), known to have trained in a gun club;
- KimVeer Gill (Dawson College, 2006, 1 murdered, 19 injured), known to have trained in a gun club;
- Richard Bain (Metropolis club in Montreal, 2012, 1 murdered, 1 injured), known to have trained in a gun club;
- Phu Lam (Edmonton, 2014, 8 murdered incl. 2 children);
- Alexandre Bissonnette (Quebec Mosque, 2017, 6 murdered, 5 injured), known to have trained in a gun club;
- Richard Jonathan (Toronto, 2022, 2 murdered);
- Francesco Villi (Toronto, 2022, 5 murdered, 1 injured).

back to the House of Commons, resulting in substantial delays. We therefore recommend that Bill C-21 be adopted by the Senate as is, without any amendments.

### ***Support for comprehensive ban on assault weapons and large-capacity magazines***

Finally, the third issue of significant concern is the [absence in the bill](#) of an effective evergreen definition of “prohibited weapons” to ban assault weapons, despite the government’s commitments and attempts to include one. While we wish to see the bill adopted by the Senate as is, without any amendments, we are simultaneously counting on the government to complete the incomplete 2020 ban on assault weapons through a new Order in Council.<sup>3</sup> C-21 would play a critical role with respect to such regulations as it would ensure that these cannot be reversed without debate and a vote in both Chambers of Parliament.

As we have already stated, we are hoping that Senators who support stronger gun control measures will formally recognize that Canada (despite Bill C-21) still [doesn’t have](#) a comprehensive ban on assault weapons and that they will call on the government to enact the necessary regulations to achieve this, along with a comprehensive ban on [large-capacity magazines](#).

Next December 6<sup>th</sup> is the 34<sup>th</sup> anniversary of the Polytechnique femicide. The 7<sup>th</sup> anniversary of the Quebec Mosque shooting will follow shortly thereafter. Years have also passed since the Concordia University, Dawson College and Danforth mass-shootings, all of which also involved legal handguns or assault weapons (or stolen from a legal owner in the Danforth case). Families related to victims and survivors have fought for years to strengthen gun control and to ban assault weapons and handguns in particular.

After more than three decades, many of the parents of the victims of Polytechnique are no longer with us. But for those that remain, the adoption by the Senate of Bill C-21, along with Senators taking a strong stand on the need for a comprehensive ban assault weapons and large capacity magazines, would appropriately honor the memory of their daughters.

#### **Nathalie Provost**

Survivor, Polytechnique  
PolySeSouvient spokesperson

#### **Suzanne Laplante-Edward**

Mother of Anne-Marie Edward  
Polytechnique

#### **Boufeldjda Benabdallah**

Spokesperson  
Quebec Mosque community

#### **Louise De Sousa**

Mother of Anastasia De Sousa

#### **Meaghan Hennegan**

Survivor  
Dawson Families for Gun Control

#### **Hugh Brodie**

Former Assistant-Rector, Concordia University  
Manager of the petition to ban handguns

CC: All Senators

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<sup>3</sup> In his testimony before this committee on October 23<sup>rd</sup>, Public Safety Minister Dominic Leblanc [committed to](#) “re-establishing the Canadian Firearms Advisory Committee to independently review the classification of existing models that fall under the new prospective definition of prohibited weapons in Bill C-21, and to identify those that qualify as hunting firearms for exclusion from a future order-in-council to ban all existing assault weapons” and “strengthening the regulations on high-capacity magazines to eliminate loopholes and exemptions that allow access to magazines of more than 5 or 10 rounds for long guns and handguns respectively.” This is a very positive development. However, Canadians have been promised a ban on assault weapons since 2015 and nothing substantial has changed on the ground since (weapons prohibited in 2020 are still in the hands of their owners and [hundreds of models](#) remain legal).