



**PRESENTATION ON BILL C-21 TO STANDING COMMITTEE ON PUBLIC SAFETY
NOVEMBER 3, 2022**

Thank you for the invitation to appear before the committee. Before I begin my presentation, I would like to express my frustration at the late invitation, 3 days prior, to appear before this committee. We are a small organization with limited resources and a very full agenda. Taking the time to prepare and attend the session, with such short notice presents significant challenges and does make us wonder if the link to gender based violence against women is simply an afterthought for the committee.

Women's Shelters Canada (WSC) is a national non-profit organization representing 15 provincial and territorial shelter associations and 600 violence against women (VAW) shelters and transition houses from across the country.

Bill C-21 is an important Bill for those of us concerned with GBV. Having said that, we do have some concerns and suggestions as to how the Bill could be strengthened.

Before addressing the Bill itself, I would like to present some context from the perspectives of violence against women shelters.

Within the context of the COVID-19 pandemic, VAW has often been referred to as the shadow pandemic. For those of us working in this field, it is definitely not a shadow pandemic. Gender-based violence against women is both a human rights and a public health crisis of pandemic proportions.

Guns are used to terrorize, injure and kill women and their children in urban as well as rural settlements. We know that the risks are higher in rural communities where there are more guns and more opposition to gun control and fewer supports for women living with violence.

Most women are killed with legal guns and legal gun owners.

According to the Canadian Femicide Observatory, there has been a **26% increase** in killings of women and girls from 2019 to 2021. In 2021, **173 women and girls** were violently killed. When know, 38% of these murders where with a firearm. As a result of these killings, 164 children were left without a mother. The 2021 report, made it abundantly clear that proportionate to their population sizes, small, rural and remote communities bear a larger burden of femicides than urban ones.

The 2022 Refrew County Inquest specifically addressed the additional risks with respect to femicide and suicide posed by gaps in the application of risk assessment and gun licencing laws and regulations, particular to the rural context.

Firearms cause harm to women in ways other than by death and injury. In our Shelter Voices survey, we ask shelters to report on a specific 24-hour period. One of the questions is, to your knowledge how many women currently residing at the shelter have been threatened by a gun. Since the survey began, the average number of shelters that have responded is 230 and the average number of women staying at the shelter at that time that had been threatened by a gun is 100. The link between guns and violence against women is clear as is the link between guns and the instance of lethality for victims of domestic violence.

It is my understanding that the Bill will revoke an individual's licence if they have engaged in an act of domestic violence or stalking or become subject to a protection order. In order to maximise the potential benefits of this, we feel that there are several concerns that need to be addressed.

We feel it is necessary to define domestic and family violence within the Bill. Our suggestion is to refer to the definition of family violence recently adopted in the Divorce act.

We have concerns in terms of the time it may take between when it is deemed that the firearm must be removed and when this actually happens. It has been documented numerous times that women are at the highest levels of danger of lethality when they make it know to their abuser that they are leaving the situation. We feel that the Bill needs to be made more explicit on this and feel that a 24 hour period should be followed.

We are also concerned that there are too many steps to be taken before the firearm is removed and that this will lead to confusion and possibility different parties passing responsibility onto others or using this to excuse their inaction.

The Bill authorizes the issuance, in certain circumstances, of a conditional licence for the purposes of sustenance or employment. We strongly feel that the employment exemption must be removed. One example here is the case of police officers. Although there is limited research in Canada, research done in the United States suggests that officers are actually more likely to abuse their domestic partners than the general public. In Nova Scotia alone, 14 police officers from across the province have been charged with crimes connected to domestic violence since 2012.

In closing, I would like to stress the importance of the need to improve the processes associated with screening gun owners and removing firearms from people who are a risk to themselves or others. The federal government uses its power to make decisions about who can have firearms licenses. Important measures like spousal notification and reference checks as well as continuous eligibility was introduced to help ensure this power was used to refuse applicants and remove licenses from people who "in the opinion of the firearms officer" are a threat to

themselves or any other person. Unfortunately, multiple inquests and inquiries and incidents of domestic violence have shown that this is not being done.

Therefore, we strongly recommend ensuring that there is strong language reinforcing this responsibility. We also urgently need greater resources, commitments and accountability measures to ensure this responsibility is being exercised.

The need for greater resources, commitments and accountability measures goes far beyond this Bill. This is one of many reasons why WSC has been advocating for a National Action Plan on GBV for over a decade. Also important in our call for a National Action Plan is the need for consistency across and within jurisdictions in policies and legislation that address GBV against women. It will be important that this be an integral part of the implementation of this Bill.