

From: [CSAAA Association](#)
To: [councilmeeting](#)
Subject: My comments for 2019.RM12.3 on November 26, 2019 City Council
Date: November 25, 2019 12:20:49 PM

To the City Clerk:

Please add my comments to the agenda for the November 26, 2019 City Council meeting on item 2019.RM12.3, Introduction of Committee Reports and New Business from the Mayor and City Officials

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

Comments on HL11.1 Board of Health *Community Violence in Toronto - A Public Health Approach*

Mayor Tory and Councillors, my name is Alison de Groot, I am the Managing Director of the Canadian Sporting Arms and Ammunition Association (CSAAA) and I am submitting these comments on behalf of our Board of Directors and member businesses.

First, I want to clarify that the CSAAA represents licensed business owners in the sporting arms industry in Canada including Canadian manufacturers, distributors, wholesalers, retailers and gunsmiths. While we support licensed firearms owners as they are our customers, we do not speak for them, we are only speaking on behalf of our business members.

The CSAAA is a non-partisan, industry led organization governed by a volunteer Board of Directors elected from and by our business members. We do not accept any government funding nor do we provide any political endorsements or funding.

We offer our industry's technical expertise, knowledge of the legal firearms marketplace, as well as feedback on the efficacy and economic impact of firearms policy as a resource to all levels of government on behalf of our small business owners.

For your perspective, there are 4,500 licensed firearms and ammunition businesses in Canada. The vast majority of these businesses are small, privately owned businesses. These businesses employ some 48,000 Canadians.

According to the Conference Board of Canada's recent report on the Economic Footprint of Angling, Hunting, Trapping and Sport Shooting, released in July of this year:

- 426,000 Ontario residents participate in hunting
- 369,000 Ontario residents participate in sport shooting

- Ontario consumers spent \$2.7 Billion on hunting and sport shooting
- Hunting and sport shooting contributes \$1.9 Billion to Ontario's GDP
- Hunting and sport shooting support 15,000 full-time equivalent jobs and \$935 Million in Labour Income in Ontario
- In 2018 the Province collected \$454 Million in tax revenues from these two activities.

And finally, for your background and directly related to the City of Toronto, there are two significant sporting arms business located in the City of Toronto, both of which are members of the CSAAA.

North Sylva is Canada's largest sporting and law enforcement firearms and ammunition importer-distributor. North Sylva has been owned and operated by generations of the Saverino family for more than 50 years. In addition to supplying sporting arms retailers across the country, North Sylva also supplies the R.C.M.P., the Ontario Provincial Police, the Toronto Police Service and numerous other municipal police services. North Sylva employs 50 staff and is located in Ward 5 represented by Councillor Frances Nunziata.

Also located in the City of Toronto is Al Flaherty's Outdoor Store. Al Flaherty's is the only independent sporting arms retailer in the City of Toronto proper. Al Flaherty's has been family-owned and operated for more than 70 years. Al Flaherty's employs 7 staff and is located in Ward 9, represented by Councillor Ana Bailão.

Items 5 and 6 of HL11.1 directly impact these business owners and their employees.

We commend the Board of Health for recognizing that the City of Toronto has a serious problem with criminal gun violence. We applaud the Board for its recommendations to better identify, collect and review data on community violence. Good public policy decisions can only be crafted from reliable, fact-based information.

We also applaud the Board's focus on developing an informed community safety and well-being plan that addresses the root causes of criminal violence in this community and to develop adequate and sustainable vulnerable group and victim support services.

On item number 5: The Board of Health urge the provincial government to ban the sale of handgun ammunition in the City of Toronto.

With the exception of some very unique, often older, types of ammunition for very specific handguns, there is no such thing as handgun ammunition. Almost all modern ammunition can be used in either handguns or rifles including single shot hunting rifles. Ammunition is not manufactured for a specific type of firearm but rather for the cartridge used in the firearm. And just like any firearm sold in Canada, ammunition can only be legally purchased from a licensed ammunition retailer by an individual with a valid Possession and Acquisition License or PAL. All ammunition sales are logged by the retailer and those records are available to law enforcement.

Given that the vast majority of the firearms used in crimes in the city of Toronto are being committed with unregistered, illegal firearms, it is also logical to assume the ammunition is also coming from illegal sources. Every single box of ammunition that leaves either North Sylva or Al Flaherty's or any other Canadian sporting arms retailer is documented and traceable.

On item number 6: The Board of Health urge the federal government to prohibit the availability, sale, possession, and use of handguns, assault rifles and semi-automatic firearms in Canada.

Again, according to the Conference Board of Canada,

- 1.3 Million Canadians participate in legal hunting in Canada
- 1.4 Million Canadians participate in legal sport shooting, or competitive range-based shooting, in Canada
- Canadians spend \$8.5 Billion on hunting and sport shooting
- Hunting and Sport Shooting contributed \$5.9 Billion to Canada's GDP in 2018
- Hunting and sport shooting support 48,000 jobs across this country
- Hunting and sport shooting supports 4500 small businesses in mostly non-urban, rural and northern communities all across Canada

Modern Sporting Rifles, or MSRs and semi-automatic rifles and shotguns are used in both hunting and sport shooting and handguns are used in sport shooting. There are more than 25 international competitive shooting associations, many of which are active in Canada including:

- the Canadian Shooting Federation and International Shooting Federation, the training ground for our Olympic shooting team
- the International Practical Shooting Confederation of Canada or IPSC
- the Dominion of Canada Rifle Association
- the National Sporting Clays Association of Canada and
- the Canadian University Shooting Federation just to name a few.

More than a million Canadians participate in this sport and Canada boasts medal-winning athletes at the local, provincial, national and international levels including our Olympic athletes. Did you know that at the last Summer Olympic Games in 2016, the Canadian shooting team was all women? There are 15 Olympic shooting events including Pistol.

I point out this information, not to in any way diminish the serious problem you face here in the City of Toronto; but rather to point out that your problem is not the legal sporting arms used and enjoyed by millions of your fellow Canadians, rather your problem stems from a serious crime problem that can't be solved by the stroke of a pen. Even your Chief of Police says a handgun ban will not affect crime in this city. You are letting your constituents down allowing them to think they will be safer by targeting legal firearms businesses or firearms owners. And every dollar that is spent on enacting, building the infrastructure and enforcing additional regulations on an already thoroughly-regulated, law-abiding group, diverts valuable funding and resources that could be used to address the real issues of poverty, disenfranchisement,

lack of opportunity, cost of living, drug addiction, racism, sexism and a lack of mental health treatment and support systems. These are not issues that can be solved by the stroke of a pen or in a single term of office.

Most of our 4500 small businesses aren't in downtown Toronto, but you probably drive by, and even stop in at, some of them to pick up bait or a new fishing rod on your way to the cottage on the weekend. Our business owners and their customers are good, decent people. They don't see themselves or their customers reflected in the shooting and stabbing stories pouring out of the city of Toronto, yet their businesses, employees and customers will be the victims of bad public policy that does nothing to solve the problem of violent crime in this city.

We respectfully urge this Council to consider carefully the efficacy of recommendations 5 and 6 today as they will result in the city's loss of two prominent businesses and the 57 jobs supported by those businesses.

The CSAAA and our business members are available today or at any time, for any of your questions.

Click here to view the full Conference Board of Canada [Economic Footprint of Angling, Hunting, Trapping and Sportshooting 2019](#) report. For the purposes of our industry we are referencing Hunting and Sport Shooting data only.

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on behalf of the Board of Directors and Member Businesses
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