



The Honourable Vic Toews
Minister of Public Safety
Suite 306, Justice Building House of Commons
Ottawa, Ont. K1A 0A6

November 8, 2011

Re: Bill C-19, *Ending the Long-gun Registry Act, An Act to amend the Criminal Code and the Firearms Act*

Dear Mr. Toews:

I am writing you on behalf of the Association of Canadian Archivists (ACA) to urge you to reconsider the records destruction provisions in Bill C-19, *Ending the Long-gun Registry Act, An Act to amend the Criminal Code and the Firearms Act*.

Established in 1975, the ACA is a national professional organization that represents archivists in Canada. Archivists have significant experience in balancing the competing public policy requirements regarding the use, preservation, and destruction of records. The ACA believes that it therefore has a valuable perspective on Bill C-19.

The ACA is concerned that Bill C-19 contains provisions that explicitly override existing legislated information management processes. The current disposition of records in the Firearms Registry is for destruction ten years after last administrative action. Further, Sections 12 and 13 of the *Library and Archives of Canada Act* (LAC Act) require written permission from the Librarian and Archivist of Canada to destroy records. However, sections 29 (1) (2) and (3) of the *Ending the Long-gun Registry Act* call for the destruction of records “as soon as possible” and that the LAC Act be ignored.

The ACA urges the government to trust the records management processes already enshrined in current legislation. The Firearms Registry records were scheduled according to business needs and to potential historical value by the creating department and professional archivists at Library and Archives Canada. These processes ensure accountability and transparency with regards to the destruction of government records. Destroying records for political expediency and disregarding the LAC Act sets a very dangerous precedent for future legislation and record keeping practices.

The Association of Canadian Archivists thinks it is unfortunate that the federal government is overriding the existing legislation to destroy the long-gun registry records. We urge you to remove sections 29 (1) (2) and (3) from Bill C-19, *Ending the Long-gun Registry Act, An Act to amend the Criminal Code and the Firearms Act* and allow the disposition of these records to follow current legislated records management processes.

Yours Sincerely,

Original signed by Loryl MacDonald

Loryl MacDonald
President, Association of Canadian Archivists