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VIA REGULAR MAIL

September 30, 2008

The Hon. Robert Douglas Nicholson, P.C., Q.C., M.P.
Minister of Justice and Attorney General of Canada
East Memorial Building, 4th Floor
284 Wellington Street
Ottawa, Ontario K1A 0H8

Dear Mr. Nicholson:

Re: Proposed Revisions to the Animal Cruelty Provisions of the *Criminal Code*

We are writing to you on behalf of the Canadian Sportfishing Industry Association ("CSIA") representing manufacturers, distributors, retailers and sales agencies which serve the eight million Canadians who fish as part of their outdoor heritage. This industry generates an annual economy of over $7 billion – equivalent to the annual amount Canadians spend on beer. More Canadians fish for recreation than play golf and hockey combined.

On their behalf, we wish to register our opposition to Bill C-558 which, to a large extent, is a re-introduction of Bill C-50, a bill introduced in the 1st Session of the 38th Parliament. Although Bill C-558 has died on the order paper, we are concerned that a similar bill will be put forth in the next Parliament, and the comments in this letter should be read as referring to Bill C-558 and similar legislation which we expect to be brought forward by the next government.

Bill S-203, which became law in 2008, accomplishes the Government's primary objective in the reform of animal cruelty provisions, namely increasing the maximum penalties for existing offences of animal cruelty. We object to Bill C-558 because it substantively changes the law of animal cruelty and negatively impacts Canadians who hunt and fish lawfully.

The Library of Parliament report on Bill C-558[1] (the "Library of Parliament Report") suggests that anglers and hunters will not be negatively affected by Bill C-558. It concludes that "people carrying out traditional practices relating to animals should not be subject to prosecution, unless they are wilfully doing cruel things to animals outside of standard practices. Furthermore, screening processes – which take place before an accused person is even notified – should prevent frivolous

[1] Library of Parliament, *Bill C-558 on Animal Cruelty* by R. MacKay (Ottawa: Library of Parliament, 10 July 2008).

prosecutions from proceeding."[2] For the reasons that follow, we disagree with these conclusions in the report.

While you and your Department have said that the offence of cruelty to animals is not intended to forbid conduct that is socially acceptable or "authorized by law", such as hunting and fishing,[3] Bill C-558 will have the ultimate effect of intimidating anglers and hunters who will be discouraged from participating in the outdoor heritage activities of hunting and fishing for fear of prosecution.

As Senator Bryden said in opposing Bill C-50, the changes to animal cruelty law in Bill C-50, many of which appear again in Bill C-558, amount to significant changes to the law which should require very careful and open debate.

> [T]hese housekeeping amendments went further than modernizing language and simplifying the law. Arguably, they would be substantively changing the law.... If there is a consensus that the law on cruelty to animals needs reforming, then let us have that debate, but let us do so honestly, openly and in a transparent manner, engaging the Canadian public and parliamentarians as these important issues require.[4]

To that end, we set out below our serious objections to Bill C-558 on behalf of the CSIA. The rationale for many of the changes in the law put forward in Bill C-558 is discussed in the Library of Parliament Report. We have related comments in the Library of Parliament Report, in the order in which they appear in that report, to the various amendments to the *Criminal Code* proposed in Bill C-558.

DEFINITION OF "ANIMAL"

Bill C-558 includes the following definition of 'animal': "a vertebrate, other than a human being." The current provisions of *Criminal Code* use terms such as "cattle" or "dogs, birds or animals that are not cattle and are kept for a lawful purpose."

The Canadian Oxford Dictionary[5] defines "vertebrate" as "any animal of a subphylum Vertebrata, having a spinal column, including mammals, birds, reptiles, amphibians, and fishes."

The Library of Parliament Report suggests that the new definition proposed in Bill C-558 aims to afford protection to all animals, "whether they are owned or not" and attempts to make animal cruelty laws more effective in that "they can be more widely applied than is currently the case."[6]

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[2] *Ibid.* at 7.
[3] Minister of Justice and Attorney General of Canada, *Crimes Against Animals: A Consultation Paper* (Ottawa: Communications and Executive Services Branch, 1998).
[4] *Canada Senate Debates* (10 March 2005; 15:10 – 15:40) Sen. John G. Bryden.
[5] *The Canadian Oxford Dictionary*, 2001 ed., s.v. "*vertebrate*".
[6] *Supra* note 1 at 2-3.

Section 445.1(1)(a) of the current *Criminal Code* makes it an offence to wilfully cause "unnecessary pain, suffering or injury to an animal or a bird." It does not make a distinction between animals or birds that are owned and those that are not.

The definition of "animal" proposed in Bill C-558 expands the scope of application of animal cruelty provisions and, consequently, increases the potential for prosecution of anglers and hunters.

This new definition is not a necessary change to the *Criminal Code* as it will not in any way assist in making the animal cruelty laws more effective. To our knowledge, no complaints have been brought to the attention of prosecutors or the Department of Justice regarding any failing of the current wording of the *Criminal Code* in this regard.

KILLING AN ANIMAL WITHOUT A LAWFUL EXCUSE

Section 182.2(1)(b) of Bill C-558 creates an offence of killing an animal "without lawful excuse". The Library of Parliament Report describes but does not clearly support this change in the law.

The offence created by section 182.2(1)(b) of Bill C-558, killing an animal "without lawful excuse", should not be part of the *Criminal Code* because the existence of this offence without a clear exception for lawful fishing and hunting lends itself to misuse and harassment of anglers and hunters fishing and hunting lawfully.

The term "without lawful excuse" is not defined in the *Criminal Code*. In *R. v. Holmes,*[7] the Supreme Court of Canada defined "lawful excuse" to mean a very general term, which normally includes all of the defences which the common law considers sufficient reason to excuse a person from criminal liability. An angler or hunter charged with an offence under this section therefore would have to rely on one or more of those common law defences. As we point out in a section below, none of those defences are likely to be helpful.

Presence or absence of lawful excuse is determined on a case by case basis. However, the often cited but flawed example of a provincial hunting or fishing licence as a lawful excuse has been found wanting in precedents.[8] Furthermore, section 182.2(1)(b) of Bill C-558 allows anglers and hunters to be charged and to be forced to defend themselves by proving that they have a lawful excuse.

MOVING ANIMAL CRUELTY OFFENCES TO NEW PART V.1

Bill C-558 proposes to move animal cruelty offences from Part XI, "Wilful and Forbidden Acts in Respect of Certain Property" section of the *Criminal Code* to the newly created Part V.1 which follows Part V, entitled "Sexual Offences, Public Morals and Disorderly Conduct."

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[7] [1988] 1 S.C.R. 914.
[8] See generally *R. v. Jorgensen*, [1995] 4 S.C.R. 55 (QL).

The Library of Parliament Report suggests that the effect of the move "would presumably be that these offences will no longer be viewed solely as offences against property. The intention would seem to be that animal cruelty offences be viewed as unique offences and not ones that are dependent on an ownership relationship with a human being."[9]

We submit that the animal cruelty provisions should not be moved out of the property section of the *Criminal Code*. The relationship of members of society to commercial livestock, commercially caught fish and to household pets is in the nature of property. Commercially caught fish are owned by commercial fishermen, and, similarly, livestock are owned by farmers. Property interests are involved in recreational hunting and fishing. It is illegal to steal or wrongfully take caught fish from an angler, or a slain deer from a hunter.

Animal cruelty offences are effectively dealt with under current criminal laws, specifically, under section 445.1, and, in particular, under section 445.1(1)(a) of the *Criminal Code*. This offence clearly demonstrates society's concern that "unnecessary pain, suffering or injury" not to be caused to animals. Bill S-203, which became law in 2008, increased penalties for animal cruelty and responded to concerns that animal cruelty offences are not taken seriously enough. Moving animal cruelty provisions out of the property section of the *Criminal Code* will not in any way assist in making animal cruelty laws more effective, but it could negatively affect lawful animal uses such as fishing and hunting.

ADDITION OF "RECKLESSLY" TO SECTION 445.1

Section 182.2 of Bill C-558 would amend the *Criminal Code* to criminalize reckless animal cruelty.

The Library of Parliament Report states that the protection of "traditional uses of animals" such as fishing and hunting "could be considered to be more explicit in Bill C-558 than in the current legislation..."[10] The Report suggests that the use of words "wilfully or recklessly" in section 182.2 of Bill C-558 makes it difficult for the Crown to prove its case as this section "targets deliberate cruelty, not an unthinking action that may amount to criminal negligence."[11]

We disagree. Recklessness involves a greater degree of fault than negligence but a lesser degree of fault than the intentional and deliberate wrongdoing. As we demonstrate below, Bill C-558 lowers the standard of *mens rea* needed for the Crown to prove its case. The lowered standard of *mens rea* significantly broadens the scope of animal cruelty offences and, consequently, increases the potential for prosecution of anglers and hunters fishing and hunting lawfully.

Section 445.1(1)(a) of the current *Criminal Code* criminalizes "wilful" animal cruelty. Bill C-558 expands the animal cruelty provisions by adding the word "recklessly" which enables

[9] *Supra* note 1 at 5.
[10] *Supra* note 1 at 5.
[11] *Ibid.* at 6.

criminal prosecution of anyone who "wilfully or recklessly" acts in cruel manner towards an animal.

Black's Law Dictionary[12] defines "recklessness" as conduct whereby the actor does not desire harmful consequences but nonetheless foresees the possibility and consciously takes the risk. Clearly, recreational hunting and fishing are sports in which the sportsman does not want to cause "unnecessary pain, suffering or injury" to the animal but knows that such a result is possible.

According to the Supreme Court of Canada, recklessness is found in the attitude of a person who is aware that the danger exists that his conduct may cause a result prohibited by the criminal law but who, nevertheless, persists in the conduct.[13] It is, in other words, the conduct of one who sees the risk and who takes the chance.[14]

The addition of the word "recklessly" to what is now section 445.1(1)(a) of the *Criminal Code* broadens the offence, and allows it to be used by animal rights activists to bring charges, or cause charges to be brought, against anglers and hunters.

As it applies to anglers and hunters, the existing law in section 445.1(1)(a) of the *Criminal Code* has the clear meaning that anglers and hunters must not wilfully cause unnecessary pain, suffering or injury to an animal. For example, a hunter may wound a deer, but not wilfully, while hunting, but animal rights activists may in such case target hunters for recklessly causing unnecessary pain, suffering or injury to the deer. Adding the word "recklessly" to this section creates vagueness that will enable frivolous charges to be brought against hunters and anglers.

DEFENCES IN SECTION 182.5 OF BILL C-558

The proposed section 182.5 of Bill C-558 stipulates that the common law defences set out in section 429(2) of the *Criminal Code* apply to offences created by Bill C-558.

The Library of Parliament Report suggests that the defences added by section 182.5 of Bill C-558 will protect anglers and hunters charged under this Bill.[15] For the reasons that follow, we disagree. We do not believe that these defences will be helpful to anglers and hunters charged under this Bill.

Section 429(2) of the *Criminal Code* provides that, "no person shall be convicted of an offence … where he proves that he acted with legal justification or excuse and with colour of right." It has been subsequently determined that the word "and" in the section should be read as "or."[16] The *Creaghan* case was not clear about whether this distinction created two or three defences.

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[12] *Black's Law Dictionary*, 8th ed., s.v. "recklessness".
[13] *R. v. Cooper*, [1993] 1 S.C.R. 146.
[14] *Sansregret v. The Queen*, [1985] 1 S.C.R. 570.
[15] *Supra* note 1 at 6.
[16] *R.* v. *Creaghan* (1982), 1 C.C.C. (3d) 449 at 453.

The confusion arises over the issue of whether "legal justification or excuse" is one or two defences. There is subsequent case law from the Supreme Court that does differentiate between "justification" and "excuse."[17] For the purposes of this analysis the two concepts of excuse and justification are reviewed separately.

The issue about when the defences arise was answered in *R. v. Jorgensen.*[18] In this case, the Supreme Court of Canada stated, "... the application of a lawful justification or excuse only arises once the Crown has proven all of the elements of the offence beyond a reasonable doubt."[19] As such, the Crown must first establish all of the elements of the offence before one could rely on the section 429(2) defences.

In other words, the defences set out in section 429(2) of the *Criminal Code* do not prevent the laying of a criminal charge under the proposed Bill C-558. A defence is an answer to a charge that has been laid. A hunter or an angler charged with an offence under the proposed section 182.2(1)(a), for example, would only then be required to rely on one of the common law defences enumerated below.

The following discussion describes the three defences and demonstrates that they provide limited protection for hunters and anglers facing a criminal charge under the provisions of Bill C-558.

1. Legal Justification

In *R. v. Perka,* the Supreme Court of Canada explains the difference between "justification" and "excuse."[20] A justification "... challenges the wrongfulness of an action which technically constitutes a crime."[21] Some examples referred to by the court include a police officer shooting an innocent hostage or the good Samaritan who commandeers a vehicle and breaks speed laws to rush an injured person to the hospital. Despite technically breaching the law, the perpetrator's action is something which society considers right, not wrong.[22] The Court finally views justification as a choice between two evils. The law exculpates the actor whose wrong-doing was necessary to avoid an even greater harm.[23]

2. Excuse

The defence of excuse, on the other hand, concedes the wrongfulness of the wrongdoer's actions. It arises under circumstances for which the wrong ought not to be applied to the actor.[24] Circumstances under which excuse may exist have included a person incapable of appreciating their actions due to a disease of the mind, sleep walking, drunkenness, or the person operating

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[17] *R.* v. *Perka*, (1985), 14 C.C.C. (3d) 385 (S.C.C.) (QL).
[18] *R. v. Jorgensen*, [1995] 4 S.C.R. 55 (QL).
[19] *Ibid.* at para 120.
[20] *Supra* note 17.
[21] *Ibid.* at 396.
[22] *Ibid.* at 397.
[23] *Ibid.*
[24] *Ibid.*

under a mistake of fact. The criminal actions of these individuals are disapproved of by society, but may not always attract punishment.[25]

3. Colour of Right

The colour of right defence is usually described as: "an honest belief in a state of facts which, if it existed, would be a legal justification or excuse."[26] The test as to whether the accused had an honest belief about the facts is subjective. The individual's alleged belief does not have to be reasonable. However, the issue of reasonableness can be a factor used to assess whether it was held honestly. The colour of right defence has the effect of negating the *mens rea*, or guilty mind, element of the offence. Thus, the accused individual is deemed not to have a guilty mind.

Application of the defences to hunters and anglers

As stated above, the common law defences added by section 182.5 will likely not be helpful to anglers and hunters charged under Bill C-558.

The circumstances in which the legal justification defence might apply include a situation where a person has no other source of food and is reliant on fishing and other wild game for sustenance. The need to hunt and fish in order to survive might outweigh the ill of breaching a law that purports to ban such activities. However, in Canada, there are few regions in which the need to hunt or fish for sustenance is absolute and where there are no other sources of food available. This defence would have extremely limited application to individuals hunting and fishing recreationally.

The common-law defence of excuse is not very helpful in this situation. It would be difficult to argue as a defence that an angler did, in fact, kill a fish, but that such conduct resulted from the fact that the angler was sleepwalking, or inebriated, or suffered from a disease of the mind.

The colour of right defence, too, is limited in scope and availability. A hunter or angler charged with hunting or fishing contrary to Bill C-558 could mount a defence that he or she honestly did not realize that his or her actions violated the law. However, if this individual were to face the same charges again, he or she would likely no longer be able to say that he or she had a honest but mistaken belief about the state of the law. It is, therefore, likely a one-time defence only. Furthermore, the greater the distribution of information outlining the law, such as court decisions or news reports, the more difficult it would be to argue an honest mistaken belief about a state of facts or the law.

In summary, hunting and fishing are recreational activities of Canadians which are carried out in an intentional manner generally by well informed citizens, and, accordingly, we do not believe that the defences of legal justification, excuse, and colour of right will be of much assistance to an angler or hunter charged under the new provisions. And, in any case, these defences can only

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[25] *Ibid.*
[26] *R. v. Johnson* (1904), 8 C.C.C. 123 (Ont. H.C.J.) (QL).

be pleaded after an angler or hunter has gone through the costly and difficult process of being charged and brought to trial.

PROVINCIAL FISHING AND HUNTING LICENCES DO NOT PROTECT HUNTERS AND ANGLERS

The Library of Parliament Report suggests that a provincial hunting or fishing licence would likely constitute a legal justification or excuse in defence of charges under the Bill.[27]

A provincial fishing or hunting licence would not protect someone from charges under Bill C-558.[28] An individual can be fishing in compliance with all provincial requirements and, yet, act in such a manner as to commit an offence by "wilfully or recklessly" causing cruelty to an animal.

For example, the Ontario *Fish and Wildlife Conservation Act* sets out licensing requirements for hunters and anglers, outlines guidelines for hunting, fishing and trapping, and specifies what equipment is to be used. The proposed federal Bill C-558 deals with criminal activity as it relates to cruelty to animals. When determining whether someone is guilty under the proposed Bill C-558, it is necessary to look at the manner in which the particular activity in question is carried out, not whether one has met the licensing requirements under the provincial legislation.

Therefore, holding a valid licence and complying with provincial requirements would not give an individual protection in and of itself. To avoid criminal prosecution, it is necessary to ensure that one does not perform any actions that would constitute the commission of an offence as listed in sections 182.2, 182.3 and 182.7 of the proposed Bill C-558.

PRIVATE INDIVIDUALS ARE ABLE TO LAY CRIMINAL CHARGES AGAINST ANGLERS AND HUNTERS

The Library of Parliament Report says that Bill C-558 "does not provide ordinary citizens with additional powers to lay criminal charges against anglers and hunters."[29] It suggests that the fear that the proposed new offences could be used by animal rights activists to bring private charges to harass lawful hunters and anglers is unfounded as the "screening processes ... should prevent frivolous prosecutions from proceeding."[30]

We disagree: the screening processes do not prevent frivolous prosecutions. It is important to note that private individuals do have the power, under sections 504 and 507.1 of the *Criminal Code*, to lay criminal charges against anglers and hunters without the involvement of a police officer or a prosecutor. Any individual could lay a private information (charge) against an angler for injuring or killing fish in the open fishing season, even if all the angler's licences are in order.

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[27] *Supra* note 1 at 6.
[28] *Supra* note 18 at 35-37.
[29] *Supra* note 1.
[30] *Ibid.* at 7.

Also, under the *Ontario Society for the Prevention of Cruelty to Animals Act*, every inspector and agent of the Society for the Prevention of Cruelty to Animals may exercise any of the powers of a police officer.[31] Therefore, a prosecution led by such investigator would proceed under the normal course for prosecutions of cruelty to animals under the *Criminal Code.*

Procedurally, an individual bringing a private prosecution under section 504 of the *Criminal Code* must first have his or her charge heard before a Justice of the Peace or a provincial court judge in an *in-camera* hearing. The accused is not present at this hearing. In order to establish that there is sufficient evidence for the matter to proceed, the private prosecutor must actually witness the actions that constitute an offence under Bill C-558; for example, they would have to see an individual dispatch a fish by rapping it on the head with a fish bonker. Such private prosecutor would also need to know the individual's name and would need to be able to identify that individual.

If the Justice of the Peace or the judge decides that there is sufficient evidence to proceed with the complaint, the matter will first be referred to mediation where Crown will attempt to have the dispute resolved outside of the criminal justice system. Should the complaint proceed after the mediation, it is general practice for the Crown to assume the role of prosecutor.

Pursuant to section 507.1 of the *Criminal Code*, the Justice of the Peace who receives an information laid under section 504 of the *Criminal Code* must be satisfied that the Attorney General of Canada[32] receives a copy of the information and is able to attend the initial hearing in front of the Justice of the Peace. Also, Crown Attorneys are required to assess the validity of privately laid complaints, and, if necessary, to intervene and take over the prosecution.[33]

In summary, Bill C-558 expands the scope of the current animal cruelty offences which enables animal rights groups to initiate charges against anglers and hunters without the involvement of a police officer or a prosecutor.

HARASSMENT OF ANGLERS AND HUNTERS UNDER PROVISIONS OF BILL C-558

If Bill C-558 becomes law, animal rights groups will harass and prosecute anglers and hunters. Liz White, a director of the Animal Alliance of Canada, one of Canada's major animal rights organizations, stated:

> The onus is on humane societies and other groups on the front lines to push this legislation to the limit, to test the parameters of this law and have the courage

[31] R.S.O. 1990, c. O.36, s. 11.
[32] Section 10 of the *Crown Attorneys Act* (Ontario) states that "Every Crown Attorney and every provincial prosecutor is the agent of the Attorney General for the purposes of the *Criminal Code* (Canada)".
[33] *R.* v. *Billingham* (1995), 26 O.R. (3d) 226. The authority for which action is also found in the *Provincial Offences Act.*

> and conviction to lay charges. That's what this is all about. Make no mistake about it.[34]

In the Second Reading of Bill S-24, Senator Bryden quoted Dr. Bessie Borwein, Special Advisor to the Vice-President of Research at the University of Western Ontario regarding Bill C-50, and this quote applies equally to Bill C-558:

> There are animal rights groups in Canada that have specifically and publicly stated their intention to use Bill C-10 [previous versions of Bill C-22 and Bill C-50] to further their agenda. They say they will use the law to press charges and to test it to the utmost. They will use peace officers or authorized organizations like the SPCA or humane societies sympathetic to their cause in order to press this….

While there are legislative mechanisms ensuring that both the federal Attorney General and provincial Crown Attorneys are able to oversee private prosecutions and intervene when appropriate,[35] the Attorney General and the Crown Attorneys are not required to do so. The fear of private prosecutions by animal rights groups is well founded. So it is likely that some individual anglers or hunters will be charged under Bill C-558 and will be drawn into the criminal court system for a period of time, whether or not such matter proceeds to trial.

Even if anyone charged under this Bill is ultimately acquitted, or if the Attorney General or Crown Attorney were to intervene to stay the proceeding, this long and involved process will certainly be costly and difficult for the anglers or hunters involved. Such prosecutions will clearly have a chilling effect on anglers and hunters across Canada.

EXEMPTION FOR NORMAL HUNTING AND FISHING

Neither Bill C-558 nor the *Criminal Code* expressly exempts from animal cruelty offences the death of an animal, or the causing of unnecessary pain, suffering or injury to an animal, occurring in the course of normal and lawful hunting and fishing. At least 28 States in the United States of America have exempted hunting and fishing activities from prosecution under their animal cruelty legislation.[36] Some examples include:

Alaska

> Alaska Stat. tit 11 § 61.140 (b) It is a defense to a prosecution under (a)(1) or (2) of this section that the conduct of the defendant (3) was necessarily incident to lawful hunting or trapping activities.

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[34] *House of Commons Debates* (3 June 2003) at 1700.
[35] Section 507.1 of the *Criminal Code*, and Section 11(d) of the *Crown Attorneys Act* (Ontario).
[36] Alaska, Arizona, Colorado, Connecticut, Delaware, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Missouri, Montana, Nebraska, New Mexico, North Carolina, Oregon, Rhode Island, South Dakota, Tennessee, Texas, Virginia, West Virginia, and Wyoming.

Michigan

> Mich. C.L. § 750.50 (11) This section does not prohibit the lawful killing or other use of an animal, including, but not limited to, the following: (a) Fishing. (b) Hunting, trapping, or wildlife control regulated under the natural resources and environmental protection act.

Texas

> Tex. S. and C. tit. 9 § 42.09 (f) It is an exception to the application of this section that the conduct engaged in by the actor is generally accepted and otherwise lawful: (A) fishing, hunting, or trapping.

The absence of a similar exemption in the *Criminal Code* and in Bill C-558 lays anglers and hunters bare to prosecution under sections 182.2(1)(a) and (b) of Bill C-558, and under section 445.1(1)(a) of the existing *Criminal Code.*

In addition to our opposition to Bill C-558 we urge you on behalf of the CSIA to amend the *Criminal Code* to provide an exemption from the application of section 445.1(1)(a) of the current *Criminal Code* for hunting and fishing activities. To this end we propose that section 445.1 of the *Criminal Code* be amended by adding a new subsection (2) as follows:

> Exemption
>
> (2) It is a defence to a prosecution under section 445.1(1)(a) that the conduct of the defendant was necessarily incident to otherwise lawful fishing, hunting or trapping activities.

Current subsections (2), (3) and (4) of section 445.1 of the *Criminal Code* would be renumbered accordingly.

IMPACT OF BILL C-558 UPON THE HUNTING AND FISHING INDUSTRY

Bill C-558, if enacted, and the very visible prosecutions of anglers and hunters which will be promoted by animal rights activists using the provisions of Bill C-558, will be a serious disincentive to fishing and hunting by Canadians. As a result, there may well be a significant decline in recreational fishing and hunting activity and a significant damaging economic impact on the fishing and hunting industry which has an estimated annual value of over $10 billion to the Canadian economy.

For the reasons set out in this letter, on behalf of the CSIA, we urge you to oppose the passage of Bill C-558 in the House of Commons and in the Senate.

Yours truly,

Lang Michener LLP

Per: Peter R. Hayden

PRH/as

BCC: Phil Morlock (via regular mail and email)
Tom Brooke (via regular mail and email)