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Special Issue Article

Citation Information

Crutcher, Nicole. "The Legislative History of Mandatory Minimum Penalties of Imprisonment in Canada." *Osgoode Hall Law Journal* 39.2/3 (2001) : 273-285. <http://digitalcommons.osgoode.yorku.ca/ohlj/vol39/iss2/2>

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THE LEGISLATIVE HISTORY OF MANDATORY MINIMUM PENALTIES OF IMPRISONMENT IN CANADA[©]

BY NICOLE CRUTCHER*

I. INTRODUCTION

There are currently twenty-nine offences in the *Criminal Code*¹ that carry a mandatory minimum penalty.² This has not always been the case. When the first *Criminal Code* was enacted in 1892, only six offences carried a minimum term of imprisonment. These offences included engaging in a prize fight (three months), frauds upon the government (one month), stealing post letter bags (three years), stealing post letters (three years), stopping the mail with intent to rob (five years), and corruption in municipal affairs (one month). The bulk of these early mandatory minimum penalties were directed at enforcing the legitimacy of public institutions. Since then, minimum penalty provisions have evolved to focus primarily on offences against the person.

This article outlines the legislative attempts at adding and repealing minimum penalties from the first *Criminal Code* in 1892 to present day. What becomes abundantly clear is that the number of bills introduced in each parliamentary session has grown steadily. This phenomenon must be considered by decision makers as it is obvious that minimum penalties are growing in popularity, at least among representatives Members of Parliament. The following chart is a list of all the bills introduced into the House of Commons over the last 108 years regarding mandatory minimum penalties in the *Criminal Code*.³ Only the bills in bold were passed into law. Trends and analysis are included in the conclusion.

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YEAR	PENALTY	OFFENCE	BILL
1908	1 year	Using a firearm during the commission of an offence	78 ⁴
1912	6 months	Participating in a Canadian election by an individual who was not a citizen	5 ⁵
1915	1 month ⁶	Being an inmate or keeper of a common bawdy house	74 ⁷
1917	3 months	Selling insurance without a licence	54 ⁸
	2 years	Participating in an election by an individual who was from a country that was not an ally of Canada or Great Britain	59 ⁹
1921	7 days	Injuring persons while furious driving ¹⁰ while impaired	138 ¹¹
	1 year	Stealing an automobile	138 ¹²
1922	6 months	Possession of a drug/narcotic ¹³	137 ¹⁴
	6 months	Trafficking of drugs/narcotics ¹⁵	137 ¹⁶
	6 months	Importing/exporting drugs/narcotics ¹⁷	137 ¹⁸
1925	30 days	Lying about the contents of an automobile	147 ¹⁹
1929	6 months	Dentist/physician/veterinarian prescribing drugs for non-medical purposes ²⁰	4 ²¹
	6 months	Sending/attempting to send drugs through the mail ²²	4 ²³
1931	3 months	REPEAL: Selling insurance without a licence	113 ²⁴
1933	1 year	Carrying a concealed weapon	53 ²⁵
1935	3 months	Driving a car while intoxicated	73 ²⁶
1938	2 years	Using a firearm during the commission of an offence	137 ²⁷
1941	6 months	Failing to stop after an accident ²⁸	10 ²⁹
1944	3 years	REPEAL: Theft of post letters	139 ³⁰
	3 years	REPEAL: Theft of post letter bags	139 ³¹
1948	1 year	Theft of post letters	337 ³²
	1 year	Theft of post letter bags	337 ³³
1948	6 months	Driving while impaired	207 ³⁴
1949	6 months	Driver not stopping after an accident	3 ³⁵
	6 months	Hit and run	3 ³⁶
	6 months	Driving while impaired	3 ³⁷

YEAR	PENALTY	OFFENCE	BILL
1951	7 days	REPEAL: Driving while intoxicated - first offence ³³	391 ³⁷
	1 year	REPEAL: Theft of post letters	391 ⁴³
	1 year	REPEAL: Theft of post letter bags	391 ⁴¹
	2 years	REPEAL: Using a firearm during the commission of an offence	391 ⁴²
1952	7 days	Driving while intoxicated	93 ⁴³
	14 days	Driving while impaired ⁴⁴	93 ⁴⁵
	3 months	Theft of postal matters ⁴⁵	93 ⁴⁷
	1 year	REPEAL: Stealing an automobile	93 ⁴⁵
	7 days	REPEAL: Injuring persons while furious driving while impaired	93 ⁴⁷
	3 months	REPEAL: Engaging in a prize fight	93 ⁵¹
	1 month	REPEAL: Frauds upon the government	93 ⁵¹
	5 years	REPEAL: Stopping the mail with intent to rob	93 ⁵²
	1 month	REPEAL: Corruption in municipal affairs	93 ⁵³
	3 months	REPEAL: Being a keeper/inmate of a common bawdy house	93 ⁵⁴
1954	3 months	Theft from the mail	7 ⁵⁵
	7 days	Driving while intoxicated	7 ⁵⁵
	14 days ⁵⁷	Driving while impaired	7 ⁵⁵
	1 year	REPEAL: Stealing an automobile	7 ⁵⁷
	7 days	REPEAL: Injuring persons while furious driving while impaired	7 ⁵⁷
	3 months	REPEAL: Engaging in a prize fight	7 ⁶¹
	1 month	REPEAL: Frauds upon the government	7 ⁶²
	5 years	REPEAL: Stopping the mail with intent to rob	7 ⁶³
	1 month	REPEAL: Corruption in municipal affairs	7 ⁶⁴
	3 months	REPEAL: Being a keeper or inmate of a common bawdy house	7 ⁶⁵

YEAR	PENALTY	OFFENCE	BILL
1954	6 months	REPEAL: Dentist/physician/veterinarian prescribing drugs for non-medical purposes	K-13 ⁶⁶
	6 months	REPEAL: Sending/attempting to send drugs through the mail	K-13 ⁶⁷
1957	6 months	REPEAL: Dentist/physician/veterinarian prescribing drugs for non-medical purposes	239 ⁶⁸
	6 months	REPEAL: Sending/attempting to send drugs through the mail	239 ⁶⁹
1961	7 years	Importing/exporting drugs/narcotics	C-100 ⁷⁰
	6 months	REPEAL: Possession of drugs/narcotics	C-100 ⁷¹
	6 months	REPEAL: Trafficking of drugs/narcotics	C-100 ⁷²
	6 months	REPEAL: Sending/attempting to send drugs through the mail	C-100 ⁷³
	6 months	REPEAL: Dentist/physician/veterinarian prescribing drugs for non-medical purposes	C-100 ⁷⁴
1968	30 days	Cruelty to animals	C-142 ⁷⁵
1969	7 days	REPEAL: Driving while intoxicated	C-150 ⁷⁶
	3 months	REPEAL: Theft from the mail	C-150 ⁷⁷
1973-74	1 year	Cattle rustling	C-199 ⁷⁸
	3 months	Illegally owning, harbouring, or possessing animals	C-46 ⁷⁹
1974	1 year	Cattle rustling	C-252 ⁸⁰
	3 months	Illegally owning, harbouring, or possessing animals	C-207 ⁸¹
	3 months	Killing an individual while driving while impaired	C-260 ⁸²
	6 months	Possession of a drug/narcotic	C-172 ⁸³
	6 months	Possession of a drug/narcotic	C-258 ⁸⁴

YEAR	PENALTY	OFFENCE	BILL
1974-76	1 year	Cattle rustling	C-337 ⁵⁵
	6 months	Cruelty to animals	C-328 ⁵⁵
	3 months	Killing an individual while driving while impaired	C-351 ⁵⁷
	14 days ⁵³	Failure/refusal to provide a breath sample	C-71 ⁵²
	14 days ⁵³	Blood sample exceeding 80 mg per 100 mg of blood	C-71 ⁵¹
	14 days ⁵²	Placing bets on behalf of others	C-71 ⁵³
	14 days ⁵⁴	Betting, pool-selling and book-making	C-71 ⁵⁵
	5 years	Using a firearm during the commission of an offence	C-379 ⁵⁵
	9 months	Killing an individual while driving while impaired	C-391 ⁵⁷
	6 months	Injuring an individual while driving while impaired	C-391 ⁵³
1976-77	9 months	Killing an individual while driving while impaired	C-218 ⁵⁷
	6 months	Injuring an individual while driving while impaired	C-218 ¹⁰⁰
	1 year	Using a firearm during the commission of an offence	C-83 ¹²¹
	Life ¹⁰²	First-degree murder	C-84 ¹⁰³
	Life	Second-degree murder	C-84 ¹⁰⁴
	Life	High treason	C-84 ¹⁰⁵
	6 months	Possession of a drug/narcotic	C-293 ¹²⁵
	1 year	Using a firearm during the commission of an offence	C-51 ¹⁰⁷
	3 months	Intimidating employees	C-346 ¹²³
	6 months	Possession of a drug/narcotic	C-393 ¹²⁹
	10 years	Trafficking drugs/narcotics	C-393 ¹¹⁹
1984	7 years	Trafficking drugs/narcotics	C-223 ¹¹¹
1991	5 years	Using a firearm during the commission of an offence	C-324 ¹¹²
1992	5 years	Using a firearm during the commission of an offence	C-389 ¹¹³
	5 years	Using a firearm during the commission of an offence	C-394 ¹¹⁴
1994	5 years	Using a firearm during the commission of an offence	C-293 ¹¹⁵
	5 years	Using a firearm during the commission of an offence	C-260 ¹¹⁵
	3 years	Theft of a firearm	C-260 ¹¹⁷

YEAR	PENALTY	OFFENCE	BILL
1995	4 years	Criminal negligence causing death - firearm	C-68 ¹¹⁸
	4 years	Manslaughter - firearm	C-68 ¹¹⁹
	4 years	Attempted murder - firearm	C-68 ¹²⁰
	4 years	Causing bodily harm with intent to wound - firearm	C-68 ¹²¹
	4 years	Sexual assault - firearm	C-68 ¹²²
	4 years	Aggravated assault - firearm	C-68 ¹²³
	4 years	Kidnapping - firearm	C-68 ¹²⁴
	4 years	Hostage taking - firearm	C-68 ¹²⁵
	4 years	Robbery - firearm	C-68 ¹²⁶
	4 years	Extortion - firearm	C-68 ¹²⁷
	1 year	Using an imitation firearm during the commission of an offence	C-68 ¹²⁸
	1 year	Exporting/importing restricted weapons/firearms	C-68 ¹²⁹
	1 year	Possession of weapons for trafficking	C-68 ¹³⁰
	1 year	Trafficking weapons	C-68 ¹³¹
	1 year	Possession of a firearm knowing it is unauthorized	C-68 ¹³²
	1 year	Possession of a weapon/device ammunition knowing it is unauthorized	C-68 ¹³³
	1 year	Possession of a prohibited/restricted weapon with ammunition	C-68 ¹³⁴
	1 year	Possession of a weapon obtained through the commission of an offence	C-68 ¹³⁵
	1 year	Making an automatic firearm	C-68 ¹³⁶
	25 years	Third conviction for a violent offence	C-301 ¹³⁷

YEAR	PENALTY	OFFENCE	BILL
1996	7 years	Impaired driving causing death	C-201 ¹²³
	5 years	Aggravated procuring and living off the avails of child prostitution	C-27 ¹³²
1999	2 years	Breaking and entering a dwelling house ¹⁴³	C-475 ¹⁴¹
	2 years	Second and subsequent convictions of breaking and entering a dwelling house	C-219 ¹⁴²
	5 years	Sexual interference or invitation to sexual touching of children under the age of 14	C-504 ¹⁴³
	10 years	Using a firearm during the commission of an offence	C-516 ¹⁴⁴
	20 years	Discharging a firearm during the commission of an offence	C-516 ¹⁴⁵
	25 years	Discharging a firearm during the commission of an offence that results in the wounding, maiming, or disfiguring of anyone not involved in the offence	C-516 ¹⁴⁵
	10 years	Using a firearm during the commission of an offence	C-484 ¹⁴⁷
	20 years	Discharging a firearm during the commission of an offence	C-484 ¹⁴³
	25 years	Discharging a firearm during the commission of an offence and injuring anyone not involved in the offence	C-484 ¹⁴²
	Life	Third conviction for a violent offence	C-265 ¹⁵³
2000	4 years	Second and subsequent convictions of theft of an automobile	C-426 ¹⁵¹
	10 years	Using a firearm during the commission of an offence	C-441 ¹⁵²
	20 years	Discharging a firearm during the commission of an offence	C-441 ¹⁵³
	25 years	Discharging a firearm during the commission of an offence that results in the wounding, maiming or disfiguring of anyone not involved in the offence	C-441 ¹⁵⁴
2001 ¹⁵⁵	2 years	Sexual touching of persons under 14 years of age	C-208 ¹⁵⁵
	2 years	Invitation to sexual touching of persons under 14 years of age	C-208 ¹⁵⁷
	4 years ¹⁵⁴	Theft of a motor vehicle	C-250 ¹⁵²
	1 year	Trafficking in a controlled substance within 500 metres of a school	C-255 ¹⁵³
	2 years	Breaking and entering a dwelling house	C-290 ¹⁵¹
	Life	Second conviction for a violent offence	C-291 ¹⁵²

II. CONCLUSION

Clearly, the nature of the bills introduced has varied. One of the more salient aspects of this chart is the increase in the number of private member's bills being introduced over the last few years. This increase can be seen as a response to rising demand for this type of punishment. In addition, the type of bills that are being introduced needs to be addressed. There appears to be very little tolerance for repeat offenders and offences where a firearm is used. Mandatory minimum penalties appear to be the punishment of choice for many Members of Parliament. Elected officials appear to prefer these punishments because mandatory minimum sentences are rigid and certain. Thus, politicians who support them are not seen as "soft on crime." Finally, it is interesting to note the number of bills over the past two years that have inaccuracies directly in the legislation. For example, many bills ask for lengthy periods of imprisonment, such as twenty and twenty-five years. While these are essentially life sentences, the Members of Parliament introducing these bills do not indicate this, nor do they appear to include parole eligibility periods.

Ultimately, the lack of understanding regarding important aspects of sentencing in the federal criminal justice system is a major problem. This article should be used as a building block for those interested in mandatory minimum penalties as well as decision makers in this area.

ENDNOTES

1 R.S.C. 1985, c. C-46.

2 This number reflects the minimum penalties found in the *Criminal Code* at the end of 2000.

3 In addition to the bills relating to the *Criminal Code*, this chart also includes all bills adding or repealing minimum penalties to the related statute, *Opium and Narcotic Drug Act*, S.C. 1922, c. 36, later to become the *Narcotic Control Act*, R.S.C. 1985, c. N-1, and finally the *Controlled Drugs and Substances Act*, S.C. 1996, c. C-19.

4 Bill 78, *An Act to Amend the Criminal Code of Canada*, 4th sess., 10th Parl., 1908.

5 Bill 5, *An Act to Amend the Criminal Code of Canada*, 2nd sess., 12th Parl., 1912.

6 This was for penalties applied to third and subsequent convictions.

7 Bill 74, *An Act to Amend the Criminal Code of Canada*, 2d sess. 12th Parl., 1917.

8 Bill 54, *An Act to Amend the Criminal Code of Canada*, 7th sess., 12th Parl., 1917.

9 Bill 59, *An Act to Amend the Criminal Code of Canada*, 7th sess., 12th Parl., 1917.

10 The term "furious driving" was not defined in the bill, nor was the definition indicated in the Hansard debates from the House of Commons. However, it is likely that the term is equivalent to dangerous driving.

11 Bill 138, *An Act to Amend the Criminal Code of Canada*, 5th sess., 13th Parl., 1921.

12 *Ibid.*

13 This offence is from the *Opium and Narcotic Drug Act*, which was included here as the offences fell under a general criminal offence umbrella. See *supra* note 3.

14 Bill 137, *An Act to Amend the Opium and Narcotic Drug Act*, 1st sess., 14th Parl., 1922.

15 This offence is from the *Opium and Narcotic Drug Act*, which was included here as the offences fell under a general criminal offence umbrella.

16 *Supra* note 14.

17 This offence is from the *Opium and Narcotic Drug Act*, which was included here as the offences fell under a general criminal offence umbrella.

18 *Supra* note 14.

19 Bill 147, *An Act to Amend the Criminal Code of Canada*, 4th sess., 14th Parl., 1925.

20 This offence is from the *Opium and Narcotic Drug Act*, which was included here as the offences fell under a general criminal offence umbrella.

21 Bill 4, *An Act to Amend and Consolidate the Opium and Narcotic Drug Act*, 3d sess., 16th Parl., 1929.

22 This offence is from the *Opium and Narcotic Drug Act*, which was included here as the offences fell under a general criminal offence umbrella.

23 *Supra* note 21.

24 Bill 113, *An Act to Amend the Criminal Code of Canada*, 2d sess., 17th Parl., 1931.

25 Bill 53, *An Act to Amend the Criminal Code of Canada*, 4th sess., 17th Parl., 1933.

26 Bill 73, *An Act to Amend the Criminal Code of Canada*, 6th sess., 17th Parl., 1935.

27 Bill 137, *An Act to Amend the Criminal Code of Canada*, 3d sess., 18th Parl., 1938.

28 This was a very vague bill. There was no indication as to whether this referred to someone who had simply witnessed the accident or whether the individual had to be directly involved.

29 Bill 10, *An Act to Amend the Criminal Code of Canada*, 2d sess., 19th Parl., 1941.

30 Bill 139, *An Act to Amend the Criminal Code of Canada*, 5th sess., 19th Parl., 1944.

31 *Ibid.*

32 Bill 337, *An Act to Amend the Criminal Code of Canada*, 4th sess., 20th Parl., 1948.

33 *Ibid.*

34 Bill 207, *An Act to Amend the Criminal Code of Canada*, 4th sess., 20th Parl., 1948.

35 Bill 3, *An Act to Amend the Criminal Code of Canada*, 1st sess., 21st Parl., 1949.

36 *Ibid.*

37 *Ibid.*

38 Only the minimum penalty for the first offence was repealed, the minima for second and subsequent convictions were maintained.

39 Bill 391, *An Act to Amend the Criminal Code of Canada*, 4th sess., 21st Parl., 1951.

40 *Ibid.*

41 *Ibid.*

42 *Ibid.*

43 Bill 93, *The Criminal Law Amendment Act*, 7th sess., 21st Parl., 1952–1953. This bill was the result of an independent committee set up to do a complete revision of the *Criminal Code*. It was not passed during the session and had to be re-introduced the following session. For a complete account of this revision, see N. Crutcher, “Mandatory Minimum Penalties of Imprisonment: An Historical Analysis” (2001) 44 *Crim. L.Q.* 279.

44 This penalty applied to a second conviction only; there was no minimum penalty for a first conviction.

45 Bill 93, *supra* note 43.

46 The previous sections referring to theft of postal matter were combined to form this section.

47 Bill 93, *supra* note 43.

48 *Ibid.*

49 *Ibid.*

50 *Ibid.*

51 *Ibid.*

52 *Ibid.*

53 *Ibid.*

54 *Ibid.*

55 Bill 7, *The Criminal Law Amendment Act*, 1st sess., 22nd Parl., 1953–1954.

56 *Ibid.*

57 This applied to a second conviction. There was no minimum penalty for a first conviction.

58 Bill 7, *supra* note 55.

59 *Ibid.*

60 *Ibid.*

61 *Ibid.*

62 *Ibid.*

63 *Ibid.*

64 *Ibid.*

65 *Ibid.*

66 Bill K-13, *The Narcotic Control Act*, 1st sess., 22nd Parl., 1954. Bill K-13 was a Senate bill, it was re-introduced again in 1957. The offences in this bill were found in the *Opium and Narcotic Drug Act*.

67 Bill K-13, *ibid.*

68 Bill 239, *The Narcotic Control Act*, 1st sess., 22nd Parl., 1957. The offences found in Bill 239 are from the *Opium and Narcotic Drug Act*.

69 Bill 239, *ibid.*

70 Bill C-100, *Provision for the Control of Distribution and Sale of Narcotics*, 4th sess., 24th Parl., 1961. Bill C-100 essentially repealed the *Opium and Narcotic Drug Act* and replaced it with the *Narcotic Control Act*.

71 Bill C-100, *ibid.*

72 *Ibid.*

73 *Ibid.*

74 *Ibid.*

75 Bill C-142, *An Act to Amend the Criminal Code of Canada*, 1st sess., 28th Parl., 1968.

76 Bill C-150, *An Act to Amend the Criminal Code, the Parole Act, the Prisons and Reformatenes Act and to make certain consequential amendments to the Combines Investigation Act, the Customs Tariff Act and the National Defence Act*, 1st sess., 28th Parl., 1969. When this bill was passed in 1969, it was the last time a mandatory minimum penalty was repealed.

77 Bill C-150, *ibid.*

78 Bill C-199, *An Act to Amend the Criminal Code of Canada*, 1st sess., 29th Parl., 1973–1974.

79 Bill C-46, *An Act to Amend the Criminal Code of Canada*, 1st sess., 29th Parl., 1973–1974.

80 Bill C-252, *An Act to Amend the Criminal Code of Canada*, 2d sess., 29th Parl., 1974.

81 Bill C-207, *An Act to Amend the Criminal Code of Canada*, 2d sess., 29th Parl., 1974.

82 Bill C-260, *An Act to Amend the Criminal Code of Canada*, 2d sess., 29th Parl., 1974.

83 Bill C-172, *An Act to Amend the Criminal Code of Canada*, 2d sess., 29th Parl., 1974. This bill referred to the *Narcotic Control Act*.

84 Bill C-258, *An Act to Amend the Criminal Code of Canada*, 1st sess., 30th Parl., 1974.

85 Bill C-337, *An Act to Amend the Criminal Code of Canada*, 1st sess., 30th Parl., 1974–1976.

86 Bill C-328, *An Act to Amend the Criminal Code of Canada*, 1st sess., 30th Parl., 1974–1976.

87 Bill C-351, *An Act to Amend the Criminal Code of Canada*, 1st sess., 30th Parl., 1974–1976.

88 This was for a second conviction.

89 Bill C-71, *An Act to Amend the Criminal Code of Canada*, 1st sess., 30th Parl., 1974–1976.

90 This was for a second conviction.

91 *Supra* note 89.

92 This was for a second conviction.

93 *Supra* note 89.

94 This was for a second conviction.

95 *Supra* note 89.

96 Bill C-379, *An Act to Amend the Criminal Code of Canada*, 1st sess., 30th Parl., 1974–1976.

97 Bill C-391, *An Act to Amend the Criminal Code of Canada*, 1st sess., 30th Parl., 1975.

98 *Ibid.*

99 Bill C-218, *An Act to Amend the Criminal Code of Canada*, 2d sess., 30th Parl., 1976–1977.

100 *Ibid.*

101 Bill C-83, *The Criminal Law Amendment Act*, 1st sess., 30th Parl., 1976.

102 These life terms were included as a minimum penalty as there are minimum parole eligibility periods for each term.

103 Bill C-84, *An Act to Amend the Criminal Code of Canada*, 1st sess., 30th Parl., 1976.

104 *Ibid.*

105 *Ibid.*

- 106 Bill C-298, *An Act to Amend the Criminal Code of Canada*, 2d sess., 30th Parl., 1976.
- 107 Bill C-51, *An Act to Amend the Criminal Code of Canada*, 2d sess., 30th Parl., 1977.
- 108 Bill C-346, *An Act to Amend the Criminal Code of Canada*, 1st sess., 30th Parl., 1976.
- 109 Bill C-398, *An Act to Amend the Narcotics Control Act*, 3d sess., 30th Parl., 1977.
- 110 *Ibid.*
- 111 Bill C-223, *An Act to Amend the Narcotics Control Act*, 2d sess., 32nd Parl., 1984.
- 112 Bill C-324, *An Act to Amend the Criminal Code of Canada*, 3d sess., 34th Parl., 1991.
- 113 Bill C-389, *An Act to Amend the Criminal Code of Canada*, 3d sess., 34th Parl., 1992.
- 114 Bill C-394, *An Act to Amend the Criminal Code of Canada*, 3d sess., 34th Parl., 1992.
- 115 Bill C-293, *An Act to Amend the Criminal Code of Canada*, 1st sess., 35th Parl., 1994.
- 116 Bill C-260, *An Act to Amend the Criminal Code of Canada*, 1st sess., 35th Parl., 1994.
- 117 *Ibid.*
- 118 Bill C-68, *Firearms Act*, 1st sess., 35th Parl., 1995.
- 119 *Ibid.*
- 120 *Ibid.*
- 121 *Ibid.*
- 122 *Ibid.*
- 123 *Ibid.*
- 124 *Ibid.*
- 125 *Ibid.*
- 126 *Ibid.*
- 127 *Ibid.*
- 128 *Ibid.*
- 129 *Ibid.*
- 130 *Ibid.*
- 131 *Ibid.*
- 132 *Ibid.*
- 133 *Ibid.*
- 134 *Ibid.*
- 135 *Ibid.*
- 136 *Ibid.*
- 137 Bill C-301, *An Act to Amend the Criminal Code of Canada*, 1st sess., 35th Parl., 1995.
- 138 Bill C-201, *An Act to Amend the Criminal Code of Canada*, 2d sess., 35th Parl., 1996.
- 139 Bill C-27, *An Act to Amend the Criminal Code of Canada*, 2d sess., 35th Parl., 1996.
- 140 This referred to second and subsequent convictions.
- 141 Bill C-475, *An Act to Amend the Criminal Code of Canada*, 1st sess., 36th Parl., 1999.

142 Bill, C-219, *An Act to Amend the Criminal Code of Canada*, 2d sess., 36th Parl., 1999.

143 Bill C-504, *An Act to Amend the Criminal Code of Canada*, 1st sess., 36th Parl., 1999.

144 Bill C-516, *An Act to Amend the Criminal Code of Canada*, 1st sess., 36th Parl., 1999

145 *Ibid.*

146 *Ibid.*

147 Bill C-484, *An Act to Amend the Firearms Act*, 1st sess., 36th Parl., 1999.

148 *Ibid.*

149 *Ibid.*

150 Bill C-265, *An Act to Amend the Criminal Code of Canada*, 2d sess., 36th Parl., 1999

151 Bill C-426, *An Act to Amend the Criminal Code of Canada*, 2d sess., 36th Parl., 2000

152 Bill C-441, *An Act to Amend the Criminal Code of Canada*, 2d sess., 36th Parl., 2000

153 *Ibid.*

154 *Ibid.*

155 This is not for the entire 2001 parliamentary session. This figure includes bills introduced from 29 January 2001 to 31 March 2001.

156 Bill C-208, *An Act to Amend the Criminal Code of Canada*, 1st sess., 37th Parl., 2001.

157 *Ibid.*

158 This is for a second offence only. There was no minimum penalty for a first offence.

159 Bill C-250, *An Act to Amend the Criminal Code of Canada*, 1st sess., 37th Parl., 2001.

160 *Ibid.*

161 *Ibid.*

162 *Ibid.*

