

Nov. 20, 2020

RE: Bill C-6 - Conversion therapy and the need to fix the definitions

The Hon. David Lametti and the Justice Committee
Minister of Justice
284 Wellington Street
Ottawa, Ontario K1A 0H8

Dear Minister Lametti,

I'm writing to you about Bill C-6. The following is a quote from Julia Beazley, Director of Public Policy at The Evangelical Fellowship of Canada, written to the Honorable Lametti on October 13, 2020. Please consider this as my request to you.

"Many people who have experienced conversion therapy describe despair and suicidal ideation as a consequence. We recognize that initiatives to ban conversion therapy arise from a desire to protect Canadians from such damaging effects.

"Coercive and involuntary efforts to change sexual orientation have no place within our communities.

"Our community, however, has significant concern about the scope of the proposed legislation. We are particularly concerned with the definition of conversion therapy proposed in Bill C-6, which goes beyond efforts to change a person's sexual orientation or gender identity, and includes practices, treatments and services to *'repress or reduce... sexual behaviour.'*

"There is concern that such a broad definition could infringe on religious expression, instruction and practice. An important aspect of religious identity is to learn and to share the teaching of sacred texts about how we should conduct ourselves in all areas of life, including human sexuality and sexual behaviour.

"Although the Justice Department summary says Bill C-6 would not criminalize 'private conversations in which personal views on sexual orientation, sexual feelings or gender identity are expressed ...' (emphasis added), no such exception is evident in the legislation itself.

"It is also unclear how the provisions in Bill C-6 may be applied to public religious instruction. If only exploratory conversations are exempted, will instruction or public expression, such as a sermon series or youth bible study on biblical sexual ethics, be construed as 'a practice, treatment or service?' And since the definition of conversion therapy includes reducing sexual

behaviour, could programs offered in a church or ministry setting that consider sexual activity and promote abstinence for all teens, regardless of orientation, be captured by the legislation?

“We are concerned that this legislation could, by imposing criminal sanctions, penalize and silence public speech and religious instruction on matters of sexuality and gender.

“Further, we note that the terms ‘practice, treatment or service,’ while often used in a medical or therapeutic context, are not defined in Bill C-6 and can be interpreted and applied various ways. As written, these terms could include voluntarily sought out support groups for those who choose to live their lives in accordance with their religious beliefs.

“Many of these concerns with Bill C-6 could be alleviated by:

- deleting the final clause in the definition of conversion therapy, ‘to repress or reduce non-heterosexual attraction or sexual behaviour;’ and
- clarifying in the exemptions that the following will not be considered conversion therapy:
 - parental guidance on matters of gender or sexuality
 - religious instruction on matters of gender or sexuality
 - the private or public expression of sincerely held beliefs or views
 - therapeutic or medical care offered to individuals voluntarily seeking support.

“Canadians must continue to be free to order their sexual lives in accordance with their conscience, faith identity and personal convictions, and to voluntarily access support from their faith community, spiritual leaders, and others in doing so.

“Religious institutions must also remain free to teach and instruct their members and adherents in faithful practices that are part of the religious tradition.”

Awaiting your positive response,

Linda Gabriel
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