

March 13, 2017

The Honourable Ralph Goodale, M.P.
Minister of Public Safety
House of Commons
Ottawa, Canada
K1A 0A6

Re: Recommended Solution to Concerns with implementation of UN Firearm Marking Scheme

References:

- A. My letter to the Prime Minister dated October 27, 2016**
- B. Prime Minister's response dated November 8, 2016**
- C. My letter dated March 6, 2017**

Further to my letter of March 6, 2017, I would like to advise you that the BC Wildlife Federation supports the solution to this issue proposed by the Canadian Sporting Arms and Ammunition Association (CSAAA - see attachment), and requests that you revise the "Marking of Imported Firearms (Bill C-10A) Regulations as suggested.

As you know, the 50,000 members of the BC Wildlife Federation are very concerned that the Regulations, as currently drafted, will have a negative impact on Canadians who rely on hunting to feed their families and sports shooters, by significantly increasing costs and reducing choice. It is also likely that it will have a disastrous impact on the Canadian firearms industry and result in the unnecessary loss of jobs. It could also hurt trading relationships with other countries.

The goal of the UN Firearm Marking protocol is to ensure every firearm can be tracked back to its point of origin. The protocol does not specify how that marking is to be accomplished, preferring to leave the entire implementation process up to individual party states. Canada can easily fulfill the recommendations of the "UN Firearms Protocol" by codifying the modern firearms marking practices currently being used in Canada.

All of the information required by the UN Firearms Marking Protocol is already available quickly and easily using the existing firearm markings and the systems in place to track their movement from point of manufacture to their final destination at one of Canada's firearm importers. Requiring the addition of markings that provide no useful information will unnecessarily add exorbitant costs to every single firearm imported into Canada.

The "make" of a firearm easily permits the identification of the "manufacturer" and the "country of manufacture" as required by Article 8. For example, a firearm with the "make" of "Browning" can easily be identified as being manufactured by Miroku in Japan.

Each firearm contains a serial number that is “unique” to that make and model of firearm. That serial number also identifies the year of manufacture. Commercial firearm manufacturer’s records are so meticulously detailed that the make, model and serial number of a specific firearm will reveal when and where the firearm was manufactured, when it was shipped and to which country, when the firearm was released from Canada Border Services Agency (CBSA) and the name and address of the importer.

It has been conservatively estimated that implementing the Firearms Marking Regulations, will add over \$200 to the price of every single firearm sold in Canada. This will have a devastating effect on the sale of firearms in Canada, and will place an onerous burden on those Canadians who rely on hunting to feed their families. In particular, it will negatively affect aboriginal hunters disproportionately.

Canada's firearm market is less than 3% of the world firearm market. Our few remaining firearm manufacturers and our firearm importers cannot withstand millions of dollars in startup costs to add unnecessary markings. Our existing firearm businesses most certainly cannot withstand an additional cost of \$60 million per year to mark the 350,000 firearms imported every year.

Canada’s hunters are the stewards of our wildlife, and the provincial governments rely upon hunters to regulate wildlife populations and support resource management. Firearms are an essential tool for hunters to put food on the table. Implementation of these regulations would decimate hunter numbers in Canada by enormously increasing the cost of firearms. Should the government allow implementation of these regulations, it is debatable how long we will have sufficient numbers of hunters in Canada to help manage our wildlife populations and other environmental values.

I respectfully encourage the government to amend, as recommended by the CSAAA (see attachment), the regulations under Bill C-10A, Marking of Imported Firearms, before implementing them on June 1, 2017.

Yours in Conservation,



Victor Skaarup
Recreational Sports Shooting Committee Chair
BC Wildlife Federation

Encl. Proposed Change to Firearms Marking Regulations



Copies To:

Michel Picard MP, Parliamentary Secretary to the Minister of Public Safety

Yvonne Jones MP, Co-Chair of the Parliamentary Outdoor Caucus

Rona Ambrose, PC, MP, Leader of the Opposition

Blaine Calkins, MP, Chair of the Outdoor Caucus

Tom Mulcair, MP, Leader of the New Democratic Party of Canada

All BC Federal Members of Parliament

Allison de Groot, Managing Director, Canadian Sporting Arms and Ammunition Association

Proposed Change to Firearms Marking Regulations

MARKING OF IMPORTED FIREARMS (Bill C-10A Regulations)

3. (1) Every individual, business or public service agency that imports a firearm shall ensure that the firearm is marked in accordance with section 4 before the 60th day after its release as defined in subsection 2(1) of the Customs Act or before transferring the firearm, whichever occurs first.

(2) Subsection (1) does not apply to

- (a) a firearm imported by an individual under section 35 or 35.1 of the Act;
- (b) a specially imported firearm;
- (c) a protected firearm;
- (d) a firearm that was initially exported from Canada by an individual or business if the individual or business retained ownership of the firearm while the firearm was outside Canada; or
- (e) a firearm that was initially exported from Canada by a public service agency and that was retained by that agency as an agency firearm while the firearm was outside Canada.

MANNER OF MARKING

4. (1) The firearm shall be marked by permanently stamping or engraving on the firearm's frame or receiver the word "Canada" or the letters "CA" and

- (a) in the case of a manufactured firearm, the name of the manufacturer and the firearm's serial number; and
- (b) in the case of an imported firearm, the last two digits of the year of the importation.

(2) The markings shall

- (a) be legible;
- (b) have a depth of at least 0.076 mm and a height of at least 1.58 mm; and
- (c) subject to subsection (3), be visible without the need to disassemble the firearm.

(3) In the case of an imported firearm, the Registrar, on application by the individual, business or public service agency that is importing it, shall grant the applicant an exemption from the requirement set out in paragraph (2)(c) if

- (a) marking the firearm in a place that is visible only by disassembling the firearm is consistent with the current practices of the manufacturer of that model of firearm;
- (b) the firearm does not provide a visible space suitable to stamp or engrave the markings;
- (c) the firearm is rare;
- (d) the firearm is of a value that is unusually high for that type of firearm and that value would be significantly reduced if the markings were visible without disassembly; or
- (e) the firearm is imported by a business that holds a licence for the purpose of using the firearm in respect of motion picture, television, video or theatrical productions or in publishing activities.

It is the position of the CSAAA that the following wording replace the current wording of section 4(1) of the Firearm Marking Regulations before the planned implementation date of June 1st, 2017.

4(1)(a) A firearm manufactured or imported after the coming into force of this Regulation shall be permanently marked with the firearm's serial number on the firearm's frame/receiver or barrel.

4(1)(b) A firearm manufactured after the coming into force of this Regulation shall be permanently marked with the firearm's make on its frame/receiver, or slide or barrel.