

BILL C-71

Submitted to:

Standing Committee on National
Security and Defence (SECD)

A study on Bill C-71, An Act to
amend certain Acts and Regulations
in relation to firearms

Date of submission:

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WWW.OFAH.ORG/FIREARMS/BILLC71

INTRODUCTION

The Ontario Federation of Anglers and Hunters (OFAH) cannot support Bill C-71, An Act to amend certain Acts and Regulations in relation to firearms, as written. This brief offers relevant context, concerns, outstanding questions, and OFAH recommendations that should be considered by the Standing Committee on National Security and Defence as they review and consider amendments to Bill C-71. The brief also highlights opportunities for enhancements to Canadian Firearms Program (CFP) implementation, particularly where it would achieve similar or better outcomes for public safety without legislative or regulatory changes.

This brief includes selected results from a survey of the firearms community on Bill C-71, conducted by the OFAH from April 10-16, 2018. **The survey received 3,524 responses and nearly 4,200 comments** with respondents representing all age groups, classes of firearms ownership (prohibited, restricted, non-restricted), and interests in firearms uses (e.g. sport shooting, trapping, hunting). Survey results are presented throughout the brief to contextualize concerns from the firearms community, as well as presented in a summary infographic at the end. The full survey results can be accessed at www.ofah.org/firearms/C-71.

The brief also includes a comprehensive critical analysis of Bill C-71 that highlights a number of significant outstanding questions and concerns about: **1) the rationale for proposed changes; 2) interpretation of specific provisions; and 3) clarification of how the changes will be implemented and enforced if it becomes law.** The OFAH has offered constructive suggestions for clarity to be sought by the committee during their study, as well as legislative amendments that should be put forward.

If the government is intent on changing firearms legislation and serious about respecting the firearms community as stated, then they can't move forward with this legislation without significant amendments. Amendments should not only minimize the unnecessary scope of its impact on law-abiding firearms owners, but also introduce tangible provisions to directly tackle the stated intent of targeting gangs and gun violence.

Furthermore, it is apparent that the bill as written will require government investment to build and maintain the necessary capacity to support the proposed changes. We need to look no further than the former long gun registry to see how quickly the costs of maintaining records can escalate to cost Canadian taxpayers millions or even billions of dollars. **Unnecessary expensive red-tape cannot happen again simply for the sake of appearing to do something related to firearms – it must have true added value for public safety.**

This brief will clearly demonstrate that Bill C-71 is far too light on rationale and far too heavy on uncertainty to satisfy the stated intentions of enhancing public safety and/or respecting the firearms community. **More work needs to be done before moving forward.**

PUBLIC SAFETY

Bill C-71 is being touted as public safety legislation. **The government's use of statistics is completely inappropriate, misleading and undermines confidence in their intentions and necessity for this legislation.** The government has repeatedly used 2013 as a statistical benchmark to 'demonstrate' that Canada has a firearms problem to justify the need for legislative reform. We are not surprised that such a dramatic increase was observed because it is such a short time period (2013-2016), and the fact that 2013 was the lowest for many relevant categories during the past 50 years (e.g. criminal homicides). During his May 8, 2018 testimony to the House of Commons Standing Committee on Public Safety and National Security, **Public Safety Minister Ralph Goodale acknowledged that long-term trends for firearms-related crime in Canada have actually declined.**

The government's reliance on overstated and misrepresented public safety statistics doesn't leave us with much confidence that there is a true need to implement such sweeping firearms legislation changes. In order for the OFAH and the firearms community to even consider supporting this bill, the government needs to **convince us that the proposed legislation will provide value-added benefit for public safety** that actually justifies the means – restrictions on lawful firearms owners. Even after a year of debate and discussion, we have yet to be convinced.

Investment in public safety is good, but only if we see tangible results. The single most important question we must ask ourselves is: **will there be a return on the investment required to implement the proposed changes?** If the

answer is ‘no’ or ‘we don’t know’, then we must rethink whether this is a justifiable use of taxpayer dollars, particularly when it will divert those potential funds away from making direct investments to combat the real problem, gangs and gun violence.

Minister Goodale stated that Bill C-71 was part of a much larger public safety initiative. **We applaud the government’s financial commitment to programs such as the ones to develop inclusive, diverse and culturally adapted crime prevention projects across Canada.** We are also supportive of the funding commitment to develop programs geared at preventing and intervening in local gang activity for specific areas struggling with crime (e.g. Ontario’s Guns, Gangs and Violence Reduction Strategy – which also focuses its efforts in other provinces like Saskatchewan, Yukon, and British Columbia). The OFAH is encouraged to see funding geared towards preventing crime and offer positive reinforcement for at risk youth through the Anti-Gang Family Empowerment (SAFE) program (through the National Crime Prevention Strategy). We also applaud the specific funding allocated to the RCMP and CBSA to ensure they have the resources needed for heightened security along our borders. The government’s messaging and spending clearly indicates this ‘*public safety*’ initiative was developed to target gangs, gang violence and criminal activity; however, their policy direction in Bill C-71 and the “Dialogue on Handguns and Assault Weapons” is clearly targeting law-abiding firearms users and owners. At the same time, **the policy silence on gangs, violence and criminal activity is deafening.**

It is confusing and seemingly contradictory that the federal government simultaneously introduced **Bill C-75 that appears to reduce penalties for serious crimes that Bill C-71 is supposedly trying to reduce**, such as assault with a weapon and participating in the activities of organized crime. **If the federal government is serious about tackling gangs and gun violence, how can they reduce penalties for these activities while ramping up restrictions on law-abiding Canadians at the same time.** This doesn’t make sense.

In the OFAH survey, ninety-seven percent of respondents felt that Bill C-71 is focused too much on law-abiding citizens to provide any net gains for public safety. Many respondents recognized an absence of focus in Bill C-71 on gangs, gun violence, organized crime and illegal cross-border smuggling of firearms with statements like:

“Canada does not have a gun problem. We have a gang and crime problem.”

“This bill does not address gang violence, organized crime, cross-border smuggling.”

“Bill C-71 should have been drafted as an Anti-Gang and Criminal Misuse of Firearms bill.”

It is important to remember that licensed firearms owners care about public safety as much as other Canadians. **The firearms community is not against firearms legislation, or even reasonable enhancements to what exists now. They are, however, not willing to accept the burden of further restrictions that have minimal potential to enhance public safety.** It is not acceptable to simply pull the easiest policy lever – licensed firearms owners – and label it as a win for public safety. Canadians expect more from our democratic process, whereby legislation should be developed through the pursuit of wanting to make a difference for Canadians, not simply by feigning public safety enhancements to check the box on campaign promises. The changes have to make sense for Canadians.

It is becoming increasingly clear that the bill as written is not likely to achieve the lofty goals presented for this proposed legislation. **As responsible firearms owners and Canadians hoping for real enhanced public safety, we are imploring this committee to ask tough questions and seriously consider meaningful amendments.**

ENHANCED BACKGROUND CHECKS

The OFAH is not opposed to enhanced background checks that look further into the past, but the **government needs to be clear about what happens now, and convince the outdoors community that this will actually increase public safety.** Firearms owners are already one of the most vetted segments of Canada’s population.

There is a common misconception that there isn’t enough scrutiny on who can get and keep a firearms licence in Canada. To get a firearms licence, you are required to complete the rigorous Canadian Firearms Safety Course, with additional requirements for restricted firearms through the Canadian Restricted Firearms Safety Course. These

training requirements include both written and hands-on testing to prove competency. Once course requirements are met, individuals are subject to screening prior to a licence being issued.

As stated on the RCMP website, *“As part of the CFP's mandate to promote public safety, a significant effort is made during the screening process to ensure that only those who are eligible to obtain a firearms license are granted a license.”* Between 2012 and 2017, 4,637 firearms licence applications were refused.

Chief Firearms Officers (CFO) already have the ability to go back further than five years. It is our understanding that when someone applies for a firearms licence, the CFO's office reviews each application thoroughly, on a case by case basis. When an individual's background is reviewed by the CFO, the individual's entire history is shown, not just five years. They will review the applicant's history and either approve, deny or seek more information. Their risk management approach allows them to look for trends or serious criminal activity in the applicant's history.

In addition to full background checks at the time of licence application and renewal, **firearms owners undergo ‘continuous eligibility’ screening** through the Canadian Police Information Centre (CPIC) every day to verify there has been no criminal activity since acquiring the licence. If a firearms licence holder is involved in an event involving violence (or other offences specified in Section 5 of the Firearms Act), it is reported as a Firearms Interest Police (FIP) event and sent to the relevant CFO for review. In 2016 alone, there were almost 30,000 FIP events matched to a person with a firearms licence.

In that same year, CFOs revoked 2,223 firearms licences, and this was the lowest between 2012-2017 time period (14,505 total revocations). **There are many reasons for firearms licence refusals and revocations, including court-ordered prohibition/probation, domestic violence, mental health, potential risk to self and others, and violent behaviour.** In 2017, there were just over 443,000 individuals prohibited from possessing firearms. The number of individuals has increased every year between 2012 and 2017, representing a 50% increase in the prohibitions over that time.

We have a system and it works to enhance public safety. Is this system perfect? No. A significant finding in the 2010 Program Evaluation Report on the RCMP Canadian Firearms Program was, *“License screening has been successful in denying licenses to ineligible persons, however improvements in screening applicants is hindered by limited access to information from other agencies and insufficient information about applicant mental health risk factors.”* Although things may have improved since 2010, we continue to repeatedly hear **there are still opportunities for a more coordinated and connected system among relevant agencies** (i.e. RCMP, CFO, Police Services).

Given we already have a system, and an opportunity to look beyond 5 years in the past, **we need to focus our attention on ensuring the system is operating at its full potential.** This can be accomplished by having the right people connected, at the right time, and with the right data integrated into the system. **Digging deeper and looking for different things won't help us find information that isn't there.** This doesn't require legislation changes. Rather, it will likely require some investment and a lot of coordination among relevant agencies.

Of all the overall concerns raised by the bill, **survey respondents scored background checks as their least concerning element with 45% of respondents** saying they weren't concerned with the proposed change. This means that over half of them were at least moderately concerned with just over 20% being very concerned.

One respondent commented: *“The lifetime background check is a bit strong as some folks have made mistakes in the past and have changed their life for the better.”* Others approached it from a different angle, fearing that *“firearm owners will be afraid to seek counseling for mental health issues.”*

Firearms users are concerned that enhanced background checks will be used to dig up past transgressions that are either unrelated, minor in nature, or fully rehabilitated as a means to prevent them from having a firearms licence.

Therefore, enhanced background check provisions in Bill C-71 should be reviewed and amended to:

- **Invest in enhancements to our current screening system** to ensure it has timely and complete data and is accessible by all relevant agencies
- **Include an accessible, effective and timely appeal system** when a licence has been refused or revoked

In addition, there must be a clear and transparent process for background checks that include:

- **Strict criteria, such as clear thresholds for what constitutes a ‘flag’ in the system** (e.g. violent crimes, repeat offences, etc.)
- **Case-by-case investigation with timely multi-stage verification of any issues flagged** (e.g. reference checks, personal interview, etc.)

LICENCE VERIFICATION

Responsible firearms owners who are selling firearms already check to make sure buyers have a licence, and currently have the ability to call the CFP to validate the buyer’s firearms licence if they have any questions.

The OFAH supports the intent of licence verification, as it protects the seller and ensures a legal transaction, but specific support for the proposed change is dependent on having a user-friendly and timely process that won’t saddle law-abiding firearms owners with any significant delay or burden.

In addition, **we remain concerned about how the proposed reference number system would be used and how much it will cost to administer**, not to mention there has been no evidence presented to directly link issues (e.g. illegal firearms sales) with the current process.

Only one in four respondents aren’t concerned with the licence verification proposals, whereas more than 32% are very concerned and 41% are moderately concerned. Our survey also indicated that **42% of respondents were not willing to wait at all for licence verification**, but of those who indicated they would be willing to wait, a clear majority wouldn’t wait more than 10 minutes. This tells us that **any process established for verification would need to be accessible and almost immediate**.

One of our survey respondents commented that their biggest concern with the process was, “*The need for a quick method of validating PALs - which should be able to be done online in seconds.*”

Another provided an extremely valuable real-life scenario that would be jeopardized by the proposal, stating: “*I am greatly concerned with fundraising events that often raffle or sell firearms to raise money for a certain conservation cause or project. These events are often held long after ‘normal business hours’ and/or on weekends. Will this mean an end to this critically important fundraising tool? Having to arrange shipment a day or two later only increases expenses.*”

The example provided above is common in Canada and must be incorporated into the implementation plan for any verification process. This is only one example to demonstrate unforeseen implications of the proposed changes.

Therefore, licence verification provisions in Bill C-71 should be reviewed to:

- **Ensure there is no requirement for reference number records to be kept**
 - o What value do reference numbers hold when it is not tied to a specific firearm?
- **Explicitly state that ‘lending’ or instances where there is no transfer of ownership (e.g. a mentor allowing an apprentice to temporarily use their firearm) does not require licence verification.**
- **Include an accessible, timely and effective appeal system** when verification is not granted
 - o If verification is denied, is a specific reason and/or information on how to follow up provided immediately?

In addition, there must be a clear and detailed licence verification process that includes:

- **Transparency in how the verification reference number will be used** (*if the bill is not amended*)
 - o What is the requirement, for both seller and buyer, with respect to the reference number?
 - o What records of the verification process will be retained by the CFP (e.g. reference numbers, seller’s licence, buyer’s licence, etc.), and for how long?

- How will the verification reference number (and associated information collected and retained by CFP) be used by the government or police?
 - How exactly will the reference number assist police in an investigation?
- **Multiple service platforms** (e.g. online portal, call in center) to accommodate different users (i.e. those who are not able to use online services)
- **Sufficient human and financial resources available at CFP to minimize ‘service times’** when sale volumes are high, including offering call center hours during evenings/weekends when many private sales occur
 - How many sales occur each year (to predict call volumes and wait times)?
 - What capacity changes have/will occur for the CFP to accommodate the proposed changes?
- **Further consultation, careful consideration and assurances for how the proposed changes will impact special events** (e.g. fundraising events selling firearms) that will be challenged to conform to new processes (i.e. occur late in the evening and transfer not necessarily between two individual licence holders). Again, this will require an efficient system with a variety of options to achieve high customer service standards.
- **Greater certainty for what circumstances would result in a denial in transfer**
 - With the exception of a licence not being valid at the time of verification, are there any other reasons why a verification reference number would not be issued?
- **A comprehensive cost-benefit analysis of the proposed verification reference number system**
 - How much would it cost to administer a verification number system (e.g. development and maintenance of system, additional staffing requirements for extended hours, etc.)?
 - What is the realistic benefit to public safety?

RETAILER RECORD-KEEPING

Record keeping is something many businesses already perform as a best practice. **The OFAH is not opposed to mandatory retailer record keeping, but there is a need to amend this section of Bill C-71.** Retailer record keeping was concerning to many survey respondents with over 46% saying they were very concerned and **75% saying they were at least moderately concerned.**

Many concerns were related to this system developing into some form of registry. One respondent said: *“Changes will lead to another registry, just a first step, statistics used are incorrect, and police will abuse the ‘judicial process’. As a former police officer I saw time and time again discrimination and over reaction against gun owners.”* **Another concern commonly brought forward was the safekeeping and privacy of records, and burden on retailers.** One respondent stated: *“As things are we already have to show and have our records taken every time we purchase firearms or ammo, I would rather see a system in check to protect our identity.”* Another said: *“Stores are not secure enough with firearm and ammunition records.”*

Therefore, retailer record-keeping provisions in Bill C-71 should be reviewed to:

- **Add specific provisions related to security standards for retailer record-keeping**
- **Add legislated penalties for non-compliance related to record-keeping security**

In addition, there must be a clear and comprehensive process for retailer record-keeping that includes:

- **Strict criteria for safekeeping of records** to ensure the privacy and security of personal information (e.g. not in a binder left open in public view)
- **Strict guidelines for police access to records** to ensure they are **ONLY** able to obtain the records associated with specific criminal investigations (linked to an individual or specific firearm) obtained through a judicial authorization (i.e. no police ‘fishing expeditions’ through the records)
 - When records are requested, what process (for law enforcement and vendors) will occur to ensure **ONLY** the records pertaining to a specific individual/firearm are released?
 - What is done with those records once the investigation is complete? Are they destroyed?
 - What assurances (e.g. external audit) will there be that those records are destroyed?
- **Clearly identify the process for accessing records from retailers who are no longer operating**

- Who are the prescribed officials that a business must transfer over all records if they will no longer be operating?
- What assurances will there be that those records are destroyed after 20 years?

AUTHORIZATION TO TRANSPORT (ATT)

The OFAH cannot support the removal of the automatic ATT certificate for routine activities like going to a gunsmith, gun show or crossing a border.

During testimony to the Standing Committee on Public Safety and National Security (SECU) on May 8, 2018, the RCMP indicated **the number of ATTs issued for gun show (250) and gunsmith (131) in 2015 was an extremely small percentage of the overall 143,000 issued across Canada – only slightly more than a quarter of one percent (0.267%)**. The RCMP also stated that 96.5% of the legal transportation of a firearm requiring an ATT is for the two things (travel to and from an approved range, and home from a retailer) that remain automatic under the proposed changes.

The small percentage does not justify removing these destinations as automatic ATTs. In fact, we would strongly argue **it only further illustrates that the proposed change can't possibly have the intended effect of enhancing public safety** – certainly not enough to justify the unnecessary burden it places on the firearms community and the resources it will require to implement. Those resources would be better spent fighting actual gun violence and criminals. **How do the proposed changes offer value-added for public safety?**

There appears to be a belief that these changes will assist police when they suspect an individual is just randomly driving around with a restricted or prohibited firearm in their vehicle; however, the current rules are straightforward – **if you are found in possession of restricted or prohibited firearm in an unauthorized location, then you are breaking the law**. Not only are law-abiding citizens not doing this on a regular basis, they already have strict rules (i.e. the ATT states 'for a specified purpose and the most direct route' as a condition) restricting where they can go. **The proposed changes won't enhance public safety.**

Ninety-seven percent of our survey respondents are concerned with the proposed changes to automatic ATTs.

One respondent to the survey asked: *"I would like to know how many crimes by legal gun owners on their way to a gun show, border, or gunsmith from 2013-2017 were committed to justify the change ATT requirements?"*

Despite government assurances that the process "should be almost instantaneous", we remain concerned with extended wait times. Overall, the CFP statistics from 2016 show there are approximately one million registered firearms (restricted or prohibited) in Canada. Many firearms owners have expressed concerns with the current wait times for ATTs.

One respondent to our survey said: *"I am presently waiting, now entering week 4, for a transfer authorization on a restricted rifle retail purchase. Retailer says probably another week or two. Retired police officer, member authorized clubs, RPAL since FAC, 100% squeaky clean record, have multiple restricted, prohibited non-regulated firearms, a perfect law abiding candidate and still waiting."*

Therefore, ATT provisions in Bill C-71 should be reviewed to:

- **Re-evaluate and rescind proposals to remove destinations for automatic ATTs** (gunsmith, gun show, crossing a border)
 - What statistical evidence exists to show convictions occurring under the current automatic ATT system that justifies this proposal? What realistic potential does it have for enhanced public safety?

In addition, there must be a commitment from government to:

- **Offer multiple service platforms** (e.g. online portal) to accommodate ATT requests from different users (i.e. those who are not able to use online services)
- **Provide sufficient human and financial resources to CFO offices to minimize 'service times'** by making services available during evenings and weekends when demand for ATTs is high

- If Bill C-71 becomes law, what are the current projected wait times for receiving an ATT for gunsmith, gun show, and crossing a border?
- What conversations has government had with CFO offices about capacity changes required to accommodate these proposed changes and keep service times to a minimum?

CLASSIFICATION

The issue is less about who is responsible, and more about how firearms are classified. **Rather than government investing so much time, effort and money into the ‘who’, the government must commit to establish and adhere to a standardized process for classifying or re-classifying that is consistent, transparent, evidence-based and has full consultation with firearms users.** Arbitrary classification of firearms with no oversight is a significant concern.

A standardized classification process would systematically eliminate unnecessary issues with arbitrary classification experienced in the past (e.g. Mossberg Blaze 47 firearm in 2015 and the Ruger 10/22 magazine capacity decision in 2016). **Past negative experiences contribute to the firearms community’s apprehension about returning to RCMP classification authority without proper oversight.**

A transparent process with an effective appeal system would help provide an opportunity for parliamentarians, the firearms community, and Canadians-at-large to understand decision-making and weigh-in when necessary.

More than 79% of respondents indicated they don’t care who is responsible for classification as long as it is done effectively, whereas almost 11% and 10% felt that Governor in Council (GIC) and RCMP should be responsible, respectively.

One respondent stated: *“Whether it is the RCMP or politicians, we need a way to challenge inappropriately classified arms. There should be a gov’t committee composed of knowledgeable members from various gun sport organizations.”*

Other respondents said: *“Firearms should be classified by form and function not by appearance,”* and *“Assault is the act of inflicting harm or threatening to do so. Assault is not a synthetic stock with a curved magazine and a semi-automatic action.”*

Simply put, the firearms community want a system in place that will provide consistency, eliminate arbitrary classification and re-classification and include a formal appeal system.

Furthermore, **decision-making on firearms classification should not be made on emotional social responses to the look or perception of a particular firearm.**

Bill C-71’s commitment to re-classify two groups of firearms, the CZ and Swiss Arms, is very concerning and NOT supported by the OFAH. On May 8, 2018 the RCMP testified at SECU that those individuals who would be grandfathered through C-71 to hold a new prohibited licence specific to CZ and Swiss Arms firearms will only be permitted to sell those firearms to another individual holding the same grandfathered prohibited licence. This will eliminate the ability for an owner to use these firearms and severely limit their capacity to transfer the firearm after it comes into force.

Therefore, firearms classification provisions in Bill C-71 should be reviewed to:

- **Remove the proposals to re-classify CZ and Swiss Arms groups of firearms**
 - What specific evidence exists to justify the reclassifications of these firearms?
- **Create a standardized process for classification** that is consistent, transparent, evidence-based and fully consults firearms users
- **Establish an effective and timely appeal system**

If amendments are not made to the remove the proposals to re-classify CZ and Swiss Arms groups of firearms, then the government must commit to:

- **Specific provisions that allow for the grandfathered prohibited licences for CZ and Swiss Arms firearms to be gifted** (e.g. passed down to a family member)

REGISTRY RECORDS

A lot of confusion remains for what long gun registry records exist today. Government's lack of transparency and inability to effectively communicate with firearms owners has done little to earn their trust. The government is telling us that only the Quebec records still exist, but the firearms community want clear public statements on what records remain, how they can be used, and why the government is handing them over to Quebec, especially after they lost their appeal at the Supreme Court of Canada. One respondent said: *"I was of the understanding that the long gun registry records were ordered destroyed by the Supreme Court of Canada? Why didn't that occur?"*

This section of Bill C-71 was the most concerning element to survey respondents overall, with more than 75% saying they were very concerned and 88% saying they were at least moderately concerned. In general, most respondents were confused with how the records were even available to be transferred to Quebec if they were supposedly destroyed by the RCMP in the past. One respondent said: *"I am still somewhat confused on this... all of the Registry records were supposed to be destroyed."*

Therefore, government needs to be open and transparent with firearms owners about the former Long Gun Registry records, including:

- **Clarification of what records of the former Long Gun Registry still exist today**
 - o What actions did the government take to destroy the Long Gun Registry records (e.g. when records were deleted, destroyed and audited)?
- **Clear definitions of "deleted" and "destroyed"**
- **Transparency in government's decision to hand over existing records to Quebec**
 - o How will these outdated records be used?

CONCLUSION

We have raised many questions and concerns in this brief that must be fully considered prior to Bill C-71 moving forward in the legislative process. **Significant uncertainty remains, and critical questions must be answered.** Although many of these questions are related to the regulatory and policy framework, and not the legislation itself, they are essential for understanding the true implications of this bill and must be discussed at the committee stage. **This committee can and should think critically about what is required for implementation and enforcement.** Clarity surrounding the guidelines, criteria, service standards, and resourcing needed to support the proposed legislation will be essential in recommending meaningful amendments to the bill at this stage in the process.

Summary of OFAH recommendations for amendments to Bill C-71:

1. Invest in enhancements to our current screening system to ensure it has timely and complete data and is accessible by all relevant agencies
2. Add a requirement for an accessible and effective appeal system for licence refusal/revocation
3. Ensure there is no requirement for licence verification reference numbers to be kept
4. Clearly define when licence verification is required (e.g. explicitly state 'lending' does not apply)
5. Include an accessible, timely and effective appeal system when licence verification is not granted
6. Add specific provisions for retailer information security standards and penalties for non-compliance
7. Rescind proposals to remove destinations for automatic ATTs
8. Rescind the proposals to re-classify CZ and Swiss Arms groups of firearms
 - a. If not, include specific provisions that allow for the grandfathered prohibited licences for CZ and Swiss Arms firearms to be gifted (e.g. passed down to a family member)
9. Add a requirement for a standardized classification process that is consistent, transparent, evidence-based and fully consults firearms users to eliminate arbitrary classification
10. Add a requirement for an effective and timely appeal system for classification decisions
11. Increase penalties for serious firearms-related violent crimes

The stated intention of Bill C-71 is to enhance public safety; unfortunately, much of the bill appears to be political window-dressing. Unfortunately, politically-driven polarization undermines our ability for the firearms community and gun control advocates to have a constructive discourse about the common desire of reducing violence and criminal activity that uses firearms. All lawful Canadians have this common goal, but unfortunately Bill C-71 will not offer us the tangible benefits we seek.

Do we need more restrictions on law-abiding Canadians, or do we need measures that will tackle the real issues of gun violence in Canada? Our final recommendation illustrates the need for ‘public safety legislation’ with a stated intention of targeting gangs and gun violence to **actually include some provisions that directly focus on gangs and gun violence – instead of tightening the red-tape on an already highly regulated firearms community.** Statistics Canada has shown that most violent crime in Canada does not involve firearms, so why do firearms continue to be singled out as the problem. The same report showed that in 2012, about half (46%) of all homicides committed with a firearm were gang-related. Please reference: <https://www.statcan.gc.ca/pub/85-002-x/2014001/article/11925-eng.htm#a1>

We need to reduce violence, but we need to target gangs, not guns, if we hope to enhance public safety.

Perhaps even more important than our recommendation to enhance our ‘legislative teeth’ in the form of increased penalties for serious firearms crimes, **the government must take the funding commitment of 2017 and continue to put it to work.** We already have many laws that aim to prevent gun violence in Canada, so **a willingness to enforce what we have and sufficient funding will be our best chance of actually enhancing public safety.**

In the end, **Bill C-71 has created confusion and concern among firearms users across Canada.** There has been very little convincing evidence to demonstrate a need for most of the proposed changes, and this has left the firearms community in opposition to the bill.

If the government is serious about respecting firearms owners, then they must make significant amendments to show they are listening. Unfortunately, this has not occurred at any stage in the legislative process so far. **There is still time.**



OFAH INSIGHTS

3,524

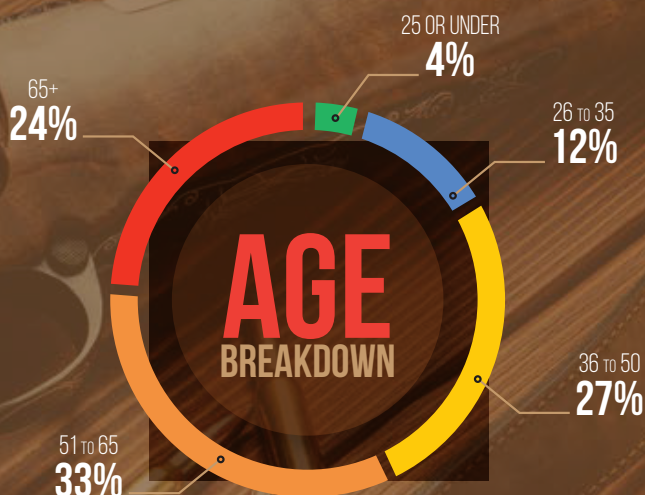
PEOPLE RESPONDED
TO THE SURVEY

97%

OF RESPONDENTS FELT
BILL C-71 FOCUSED TOO MUCH
ON LAW-ABIDING CITIZENS TO
PROVIDE A NET GAIN FOR
PUBLIC SAFETY

WHAT PEOPLE ARE SAYING:

“ This bill has no
merit in contributing
one ounce to public
safety. ”



TAKING A CLOSER LOOK AT THE OFAH'S BILL C-71 SURVEY



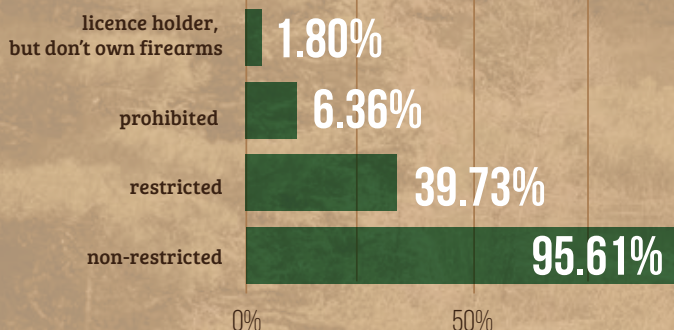
DID YOU KNOW THERE ARE

2.1 MILLION

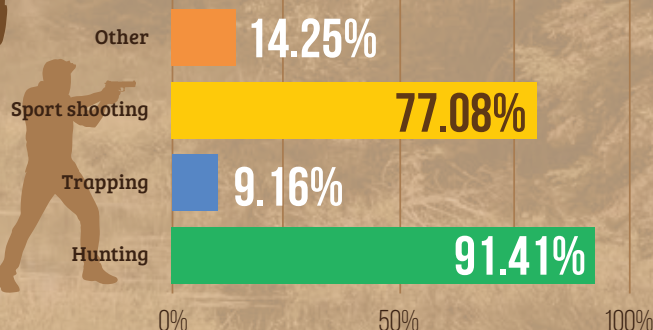
LICENSED FIREARMS OWNERS IN CANADA



TYPES OF FIREARMS OWNED



FIREARMS-RELATED ACTIVITIES



WWW.OFAH.ORG/FIREARMS/BILLC71

42% WOULD NOT WAIT AT ALL FOR LICENCE VALIDATION

58% WILLING TO WAIT AT LEAST 5 MINUTES

NOT WILLING TO WAIT AT ALL
42%

1-5 MINUTES
27%

6-10 MINUTES
16%

11-20 MINUTES
9%

21 MINS. OR MORE
6%

LICENCE VALIDATION

75%

are at least moderately concerned with retailer record keeping

Many people are wondering how

THE LONG GUN REGISTRY RECORDS

can be available to Quebec when they were supposedly destroyed

NO
13%

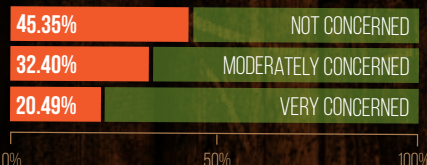
YES
87%

REGISTRY

87%

OF SURVEY RESPONDENTS BELIEVE ELEMENTS OF C-71 TO BE SOME FORM OF A FIREARMS REGISTRY

ENHANCED BACKGROUND CHECKS



CLASSIFICATION:

SURVEY RESULTS SHOW THAT 79% OF PEOPLE

don't care who is responsible for classifying firearms, as long as it is consistent, transparent, evidence-based and includes consultation with firearms owners

ATTs

97% of restricted and prohibited firearms owners are concerned about proposal to change automatic ATTs

SEE THE FULL SURVEY RESULTS AT WWW.OFAH.ORG/FIREARMS/BILLC71



The OFAH submitted brief has been endorsed by our affiliates from coast-to-coast. This includes the Yukon Fish and Game Association, Northwest Territories Wildlife Federation, British Columbia Wildlife Federation, Alberta Fish & Game Association, Saskatchewan Wildlife Federation, Manitoba Wildlife Federation, Fédération Québécoise des Chasseurs et Pêcheurs, Prince Edward Island Wildlife Federation, Nova Scotia Federation of Anglers and Hunters, and Newfoundland and Labrador Wildlife Federation. In total, our organizations represent approximately 345,000 Canadians.



Fédération québécoise
des chasseurs et pêcheurs



Nova Scotia Federation Of Anglers & Hunters

