

# ONTARIO FEDERATION OF ANGLERS & HUNTERS

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5  
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: [www.ofah.org](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)



*Ontario Conservation Centre*

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April 17, 2023

Honourable Marco Mendicino  
Minister of Public Safety  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Minister Mendicino:

OFAH members and the broader firearms community continue to be concerned with the backlog in the Possession and Acquisition Licence (PAL) application and renewal processing. We have expressed these concerns in past correspondence with your Ministry and are again asking the federal government to take immediate steps to resolve the backlog and/or implement a temporary solution(s) that will allow firearms owners with licences that expired while services were interrupted to continue to hold a valid licence until a time that the licence processing backlog can be resolved.

The OFAH acknowledges that the global pandemic has had significant impacts on many services in the past three years. We also acknowledge that service standards could be impacted by the looming threat of a strike by federal public servants. Combined, these will have significant implications for the ability of responsible firearms owners to enjoy hunting, trapping, and sport shooting activities this year.

Currently, the Firearms Act has a six-month extension period upon licence expiry that allows owners to retain their firearms. This ensures that simple possession (even while properly stored) does not put responsible firearms owners in a non-compliance situation; however, it does not allow them to buy, sell, transport, or use firearms during the extension period. This means that potentially thousands of licence holders will not be able to hunt this spring and fall, practice at the range, or carry a gun while engaged in regulated trapping activities.

Activities like hunting, trapping, and sport shooting are incredibly valuable for the social and mental well-being of millions of Canadians and are more important now than ever as a break from the challenges we face individually and as a society during these difficult times. Canadians need hunting, trapping, and sport shooting right now.

Hunting, trapping, and sport shooting result in almost \$9 billion in spending and contribute \$6 billion to the GDP, while supporting 47,000 jobs and almost \$3 billion in labour income. Canada needs the hunting, trapping and sport shooting industries to remain strong as we recover from the COVID-19 pandemic.

The government is better positioned to determine the exact legislative and/or administrative steps needed to alleviate this issue, so we will not attempt to prescribe the best possible solution. We do, however, offer some approaches for consideration.

In particular, *the Time Limits and Other Periods Act (COVID-19)* enables you as minister to extend the period during which a licence is valid. We commend the government for proposing measures that will help keep Canadians from being penalized for things that are out of their control, and specifically for including the Firearms Act as legislation that these licence extensions can apply to.

The purposes of this legislation are to: 1) prevent any exceptional circumstances that may be produced by coronavirus disease 2019 (COVID-19) from making it difficult or impossible to meet those time limits; and 2) to temporarily authorize, in a flexible manner, the extension of other periods in order to prevent any unfair or undesirable effects that may result from the expiry of those periods due to those exceptional circumstances. These purposes directly fit the PAL processing backlog issue, and the ministerial powers in the Act would go a long way to resolve the concerns we have. We strongly encourage you to exercise these powers.

If it is determined that the *Time Limits and Other Periods Act (COVID-19)* is not the appropriate solution, then we encourage the government to explore all other possibilities, including an expansion of the parameters of the existing extension period to include use and acquisition.

Furthermore, the pandemic has made it abundantly clear that every step along the path to issuing a PAL requires modernization. We strongly urge the government to invest in methods of modernizing the system and process to capitalize on the efficiency and security of online delivery mechanisms. Modernization will reduce the burden on staff, minimize the number of application errors, and reduce the wait time for a PAL. Modernization will also create resilience within the process itself so it can better withstand the impact of changing gun laws and unexpected increases in applications.

Regardless of what solution is used, the government should also clarify what “proof” of a valid licence is required. This has been a significant source of confusion for firearms licence holders, particularly when significant backlogs occur. For example, if a “renewal” was interpreted to mean that a licence had been processed and is valid, even without being in receipt of the PAL card, then could an email confirmation be considered a temporary licence until a physical one is received in the mail? Are there any other electronic, self-serve options that could be implemented to address this issue?

The approaches described above are not exhaustive and will not necessarily mitigate the challenges experienced by new applicants, so we also recommend the government explore all opportunities to establish a plan to help new or aspiring firearms enthusiasts to get a licence as quickly as possible after submitting an application.

The OFAH strongly encourages the federal government to take quick action to resolve these issues, and we are willing to work with you to find solutions that will keep Canadians hunting, trapping and sport shooting.

Thank you in advance for your consideration.

Yours in Conservation,



Mark Ryckman  
Manager of Policy

MR/jb

cc: National Fishing and Hunting Collaborative  
OFAH Board of Directors  
OFAH Firearms/Recreational Shooting/Hunter Education Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Director of Policy & Programs