



March 28, 2018

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

Re: Withdrawal of Bill C-71

I am writing to you on behalf of the 40,000 members of the BC Wildlife Federation to request that you withdraw Bill C-71. The BCWF is an organization that supports responsible gun owners as part of its mandate as a leading advocate for conservation of fish, wildlife and their habitats. You should be aware that the BCWF provides the necessary training and safe use of firearms for its members and the public at large through our government approved CORE program.

With respect, it is our view that Bill C-71 is an unnecessary imposition blatant on law abiding Canadian gun owners that will do nothing to reduce crime and make Canadians safer. If anything, it will make otherwise law-abiding Canadians potential criminals because of arbitrary and unpredictable decisions by the RCMP.

I suggest that rather than impose more unnecessary laws on law abiding citizens who own guns that you invest in meaningful actions to prevent the importation of illegal drugs and guns into Canada, and the deportation of convicted criminals and terrorists out of Canada. Such an effort would be a far better investment and provide meaningful outcomes in terms of the public attitude to firearms rather than equating them with criminals.

In closing, I respectfully request you not to proceed with legislation that unnecessarily impacts Canada's law-abiding firearms owners and does little to improve public safety.

Thank you for your consideration in this matter.

Yours in Conservation,

A handwritten signature in black ink, appearing to read 'Harvey Andrusak', is written over a light blue horizontal line.

Harvey Andrusak
President
BC Wildlife Federation



Copies to:

The Rt. Hon. Justin Trudeau, P.C., M.P.
80 Wellington Street
Ottawa, ON, K1A 0A2

All BC MPs, Federal Party Leaders

House of Commons
Ottawa, ON, K1A 0A6

March 28, 2018

Standing Committee on Public Safety and National Security
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6
Canada

Re: Request for BCWF Participation in Committee Meeting on Bill C-71

The federal government has decided to rush new Gun Control legislation through without full discussion and debate. A “Notice of Closure” on Bill C-71 has been posted, but recognized firearms groups in Canada have not been consulted on the changes.

The BC Wildlife Federation (BCWF) represents more than 40,000 British Columbians and a hundred plus sport shooting clubs and fish and game protective associations. Together, we provide training and safe use of firearms and Conservation and Outdoor Recreation Education (CORE).

Bill C-71 is missing the mark in attempting to reduce crime and make Canadians safer. Canada has one of the strictest firearm regimes in the world, but it can’t stop shootings by drug gangs. Even at the peak of the long-gun registry in 2012, Statistics Canada found that less than 5 per cent of firearms used in homicide had ever been registered. This tiny percentage means that firearms diverted from law-abiding owners cannot be the source of guns used in many violent crimes.

Only two per cent of accused murderers had ever had a Possession and Acquisition Licence (PAL). It makes no sense to target law-abiding firearms owners with this legislation; therefore, the BC Wildlife Federation requests that bill C-71 must be subject to full debate or be rescinded immediately.

The BCWF has numerous questions about the methodology and science behind the proposed legislation and expects the opportunity to provide recommendations before this Bill is pushed through. Please confirm that BC Wildlife Federation representatives will be attending your committee meeting and participating in this process.

The federation is asking our members to call, write and meet with their MPs across the province on this issue. The BCWF Firearms Committee Chairperson Gary Mauser, and BCWF Recreational Shooting Sports Committee Chair, Vic Skaarup have launched a campaign to make sure that any new firearms legislation does not harm responsible hunters and sports shooters.

The government should be working with organizations like ours to support hunter training and firearms safety among young people and new Canadians. Public safety is not being served by Bill C-71 and we cannot support it in its present form.

Yours in Conservation,



Harvey Andrusak
President
BC Wildlife Federation



**Submission to the
Federal Parliamentary Standing Committee on Public Safety and
National Security on Bill C-71**

April 3, 2018

On behalf of its 40,000 plus members, The BC Wildlife Federation (BCWF) welcomes this opportunity to address the Committee on vital issues that relates to hunting and recreational sports shooting in British Columbia.

The BC Wildlife Federation is the oldest and largest conservation organization in British Columbia. The BCWF promotes the conservation and wise use of British Columbia's fish, wildlife and their habitats and is recognized as such by stakeholders' province wide.

The BCWF supports firearms legislation measures that increase the public safety of Canadians and that do not impose unnecessary restrictions or barriers on law-abiding firearms users. The government's stated intention of Bill C-71 is to prioritize public safety and respond to increasing trends in gun crime and violence. The investments announced by the Government of Canada in 2017 to fight gangs and gun violence are a step in the right direction. However, we believe the proposals in this Bill C-71 are focused on lawful firearms users that are not the problem.

The BCWF is supports the safe storage handing and use of firearms through its Conservation and Recreation and Education Program (CORE) that annually trains 5,000 residents of British Columbia in safe use of firearms and the conservation of fish and wildlife and their habitats.

We would like to be a strong partner with all levels of government to support these objectives. Our organization volunteers over 300,000 hours in the classrooms, on shooting ranges and in the field. Many of the shooting ranges are used by law enforcement agencies to qualify and maintain officer's firearms skills in communities throughout the province.

In support of Bill C-71, the government has framed alarming trends in firearms-related crime and violence to justify the proposed measures and to show action on election platform promises of 2015. Nationally, the statistics being used to support the need for Bill C-71 references the year 2013 (lowest criminal homicides in 50 years) as the baseline to suggest we have a growing problem with firearms in Canada. However, using all available data the facts show a long-term decline in firearm-related crime, although there has been an alarming increase in gang-related criminal violence since 2010.

Canada has one of the strictest firearm regimes in the world, but evidently can't stop shootings by drug gangs. Even at the peak of the long-gun registry in 2012, Statistics Canada found that less than 5% of firearms used in homicide had ever been registered. This tiny percentage means that firearms diverted from law-abiding owners cannot be the source of guns used in many violent crimes.

Telling the public you are fighting gang violence by cracking down on law-abiding firearms owners violates your government's promise to rely upon "evidence-based decision making." Canada has a gang problem, not a gun problem.

Targeting lawful firearms users will not help your government's intended goal nor win political support in the province of BC where the lion's share of the carnage is related to gang violence associated with the illegal drug trade.

A fundamental issue of Bill C-71 is the private and public costs of implementation. The BCWF believes these funds would be better invested in more direct programs promoting gun safety, creating diversion programs for wayward youth, and reducing gang violence to meet the government's stated objectives for the legislation.

The following review by the BCWF provides comments and questions to the Standing Committee on Public Safety and National Security based on modifications to the Ontario Federation of Anglers and Hunters response to Bill C-71.

1). Enhanced Background Checks

- The Bill removes the reference or time frame "within the previous five-years" from subsection 5(2) of the act and replaces with "life history".
- No solid empirical evidence has been provided that would justify this extension.
- BCWF is concerned that this extension would unduly diminish applicants' privacy rights.
- Currently the Canadian Firearms Program does not conduct thorough evaluations of all applicants, partly due to cost implications. To extend the time frame to an applicant's life history would impose significant administrative costs.
- Currently there is a high standard to determine eligibility through 'continuous eligibility' screening, conducted daily through the Canadian Police Information Centre (CPIC) to determine whether a license holder has been the subject of an incident report.

Questions for the Committee

- What process will be used once an individual has been flagged for further examination? Is there a case-by-case review, interview, reference checks, etc.?
- How will personal confidentiality be maintained?
- The BCWF believes a robust appeal system should be in place. Will there be an appeal system in place especially to prevent unfounded complaints being used against legitimate gun owners for personal or other agendas?

NOTE: The BCWF position is the proposed changes to offer little or no value-added for public safety relative to the current continuous eligibility system and would impose significant program costs.

2). Licence Verification

- Anyone selling or “giving” a non-restricted firearm will now have to provide proof of a firearms license AND verify the validity of that license with the Canadian Firearms Program (CFP).
- The registrar will issue a reference number once the license has been confirmed and is valid for a prescribed period.
- No solid empirical evidence has been provided that would justify this requirement.
- No information will be required beyond what the CFP already has on file regarding non-restricted firearms being transferred.
- Private sales of non-restricted firearms occur regularly, and outside normal business hours.
- BCWF believes this requirement would impose significant costs upon administrative resources, and these challenges would degrade service delivery.

Questions for the Committee

- What evidence is there the current system is not working?
- How is ‘giving’ defined within the Bill? Does it include gifting and lending?
- What avenues will be available for an individual to verify a license (online, telephone)?
- Will these services be available 24/7 – 365 days a year? If not, why?
- Will there be sufficient human and financial resources available to ensure the volume of sales won’t negatively affect “service times”?
- How will the CFP use the information provided (about the transaction) and reference number (i.e. what is the primary focus/reasoning for collecting information and providing a reference number)?

3) Record-keeping by Vendors

- This applies to ALL businesses (as conditions on their license to sell firearms) and does not apply to private sellers.
- All businesses will be required to keep records of the sale of all firearms and their purchasers.
- All businesses will be required to record, and for the prescribed period, keep the prescribed information that relates to the business’ possession and disposal of non-restricted firearms.
- Businesses, NOT government, will hold these records.
- This proposal is intended to provide police services with a tool, or “starting point” in an investigation of a firearm-related crime.

-
- Records will be available to law enforcement with judicial authority, as appropriate.
 - Businesses will be required to keep records for a period of 20 years from the day in which the business transfer occurred (potentially longer if prescribed).
 - Information to be kept includes:
 - Reference number issued by the Registrar;
 - The day in which the reference number was issued;
 - The transferee's license number; and,
 - The firearm's make, model and type, and, if any, its serial number;
 - If it is determined that a business will cease to be a business, all records must be given to a prescribed official (unless otherwise directed by a chief firearms officer).

Questions for the Committee

- Upon judicial intervention, what will the process be (for law enforcement and vendors) for securing vendor records?
- Will all records be available from the vendor or only those of the individual in question? What safeguards are in place to ensure that only the records of the individual being investigated are released?
- An example of who "prescribed officials" would be in the event a business ceases to exist and must transfer over all of the files they have on record?

4) ATTs – Transportation of Restricted and Prohibited Firearms

Discretion for a Chief Firearms Office to authorize transport of restricted and prohibited firearms would be reinstated.

- Only automatic ATTs to remain would be for:
 - To an owner's home following the purchase of the firearm; and,
 - To approved shooting clubs or ranges with the province of residence.
- ANY other transportation would require an "additional ATT" from the CFO, including some locations where an automatic ATT is currently permitted:
 - To a gunsmith;
 - To cross a border; and,
 - To a gun show.
- If you are currently found in possession of restricted or prohibited firearms in an unauthorized location, then you are breaking the law.

Questions for the Committee

- How does the removal of the automatic ATT for transportation to a gunsmith, to cross a border or to a gun show, which is currently attached to a fully vetted firearms owner, reduce crime?

- What evidence exists that clearly shows the presence of automatic ATTs for transport to these three types of location is a significant issue?

NOTE: The BCWF sees no evidence that these activities have created a public safety issue.

5) Consistent Approach to Classification – RCMP

- This Bill would remove the ability to allow the Governor in Council (GIC) to downgrade the classification of a firearm, giving sole discretion back to the RCMP.
- The CZ and SAN Swiss Arms firearms would now revert back to being prohibited firearms.
- Current owners of these firearms would be grandfathered, if they comply with the new regulations (if the individual possessed one or more before June 30, 2018).
- Government would permit an amnesty period for owners to comply with grandfathering requirements.
- The GIC would be given the authority to grandfather future cases, but not downgrade.

Questions for the Committee

- How long is the amnesty period being permitted to owners?
- Government obviously sees value in the input from the GIC, given the fact that they will still be permitted to “grandfather” future cases, but not enough to offer opinion or feedback? Why?

NOTE: The BCWF position is this provision does not provide adequate separation of responsibility for establishing the rules and for enforcement and should be rescinded.

6) Long Gun Registry

Page 13 section 28 (Permission to view records) clearly states:

“The Commissioner of Firearms shall permit the Information Commissioner to view – for the purpose of settling the Federal Court proceeding *Information Commissioner of Canada v. Minister of Public Safety and Emergency Preparedness*, bearing court file number T-785-15- any record that was in the Canadian Firearms Registry on April 3, 2015.”

Furthermore, page 13 section 29 (2) – Notice, clearly states:

“If no request is provided under subsection (1) before the Commissioner is in a position to proceed with ensuring the destruction of the records referred to in that subsection, the Commissioner shall, as soon as he or she is in that position, send written notice to the Quebec Minister of that fact.”

Questions for the Committee

Are there electronic or other forms of the long gun registry in existence? If there is: Who is the custodian of those records? When will they be destroyed?

UN Firearms Marking will be issued in a Technical Amendment

- These regulations duplicate current manufacturers' marking and would result in a significant increase in the cost of firearms in Canada and a negative impact on the sporting goods industries, sports shooters and those Canadians who rely on hunting to feed their families, including, aboriginal hunters.
- Canada's strict firearm import process already accomplishes every goal specified in United Nations Protocol 55/255, formally called the *Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition, supplementing the United Nations Convention against Transnational Organized Crime*.

Questions for the Committee

How do these amendments add value to the existing regulatory framework?

NOTE: The BCWF we see the UN Marking requirement as an unnecessary and expensive duplication that should be dropped.

Summary:

We invite the federal government to join us in maintaining Canada's hunting heritage through sound strategy providing education and awareness in firearms safety conservation and the outdoors. We look forward to the Standing Committee responses to our questions and working together to resolve the difference in approach using the criteria of increased public safety, effective use of public resources and the protection of legitimate gun owners access to firearms for hunting and shooting sports.

Yours in conservation,



Harvey Andrusak
President,
BC Wildlife Federation

Copies to:

Hon. Ralph Goodale, Minister of Public Safety
British Columbia Members of Parliament



April 4, 2018

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

Re: Opposition to Flawed Authority to Transport (ATT) Provisions of Bill C-71

I am writing to you today on behalf of the 40,000 members of the BC Wildlife Federation (BCWF) to request that you withdraw Bill C-71 due to the flawed *Authority To Transport (ATT)* provisions. The BCWF is an organization that supports responsible gun owners as part of its mandate as a leading advocate for conservation of fish, wildlife and their habitats.

Canadians are already subject to onerous background checks in order to legally possess firearms and the BCWF supports the current law. The legislation you recently tabled is troubling to our organization for a number of reasons. Two of these are:

1. It is unclear what is deficient with the existing legislation. It raises the question of what were the problems related to the current system?
2. The proposed changes impact law abiding gun owners but do very little to criminals and terrorists who will continue to ignore the laws.

It is the opinion of the BCWF that you will not achieve your stated goal “to end the scourge of criminal and gang violence in our communities” through your proposed changes via. Bill 71. It is our view that your attention should be directed at smuggling of illegal drugs and firearms into Canada.

In closing, I urge you not to proceed with legislation that unnecessarily impacts Canada's law-abiding firearms owners and does nothing to improve public safety.

Thank you for your consideration in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read 'Harvey Andrusak', is written over a white background.

Harvey Andrusak
President
BC Wildlife Federation



Copies to:

The Rt. Hon. Justin Trudeau, P.C., M.P.
80 Wellington Street
Ottawa, ON, K1A 0A2

All BC Members of Parliament

Federal Party Leaders

Members of the Federal Parliamentary Standing Committee on Public Safety and National Security



April 20, 2018

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

Re: Abdication of Government Responsibility to RCMP Under Bill C-71

I am writing to you today on behalf of the 40,000 members of the BC Wildlife Federation (BCWF) to request that you withdraw Bill C-71 due to our concern for too much authority being given to the RCMP for firearms classification decisions. The BCWF is an organization that supports responsible gun owners as part of its mandate as a leading advocate for conservation of fish, wildlife and their habitats.

The BCWF is of the view that the proposed legislation requires far more thought about the role of the RCMP. In the past the RCMP have had a repeated history of incorrect firearm classifications and as a consequence, our members, as well as the general public have a great deal of scepticism about providing more authority to this enforcement agency. The question arises as to how much power and authority should the police have especially when this same agency has made numerous mistakes on gun classifications that government has had to rectify.

If your goal is as stated: "to end the scourge of criminal and gang violence in our communities", then we must ask why not place greater emphasis on addressing smuggling of illegal drugs and firearms into Canada?

In closing, I urge you not to proceed with legislation that negatively impacts Canada's law-abiding firearms owners that has little to do with improving public safety.

Thank you for your consideration in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Harvey Andrusak".

Harvey Andrusak
President
BC Wildlife Federation



Copies to:

The Rt. Hon. Justin Trudeau, P.C., M.P.
80 Wellington Street
Ottawa, ON, K1A 0A2

All BC Members of Parliament

Federal Party Leaders

Members of the Federal Parliamentary Standing Committee on Public Safety and National Security



April 23, 2018

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

Re: Opposition to Computerized License Provisions of Bill C-71

I am writing to you today on behalf of the 40,000 members of the BC Wildlife Federation (BCWF) to request that you withdraw Bill C-71 due to the flawed and unnecessary computerized license verification provisions for sale/purchase of unrestricted firearms.

The BCWF is an organization that supports responsible gun owners as part of its mandate as a leading advocate for conservation of fish, wildlife and their habitats. We question the need for this provision. At the very least there needs to be clarification based on the following questions:

- What evidence is there that the current system of having a purchaser show the license is not working?
- How much is it going to cost and how many staff will be hired to process license verifications?
- Who keeps this License Verification activity data, for what purpose, and how long will it be retained?
- What are the criterias for the License Verification to be approved or denied?

It is the opinion of the BCWF that you will not achieve your stated goal “to end the scourge of criminal and gang violence in our communities” through your proposed changes via Bill C-71. It is our view that your attention should be directed at the smuggling of illegal drugs and firearms into Canada.

In closing, I urge you not to proceed with legislation that unnecessarily impacts Canada's law-abiding firearms owners and does nothing to improve public safety.

Thank you for your consideration in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Harvey Andrusak".

Harvey Andrusak
President
BC Wildlife Federation



Copies to:

The Rt. Hon. Justin Trudeau, P.C., M.P.
80 Wellington Street
Ottawa, ON, K1A 0A2

All BC Members of Parliament

Federal Party Leaders

Members of the Federal Parliamentary Standing Committee on Public Safety and National Security



April 25, 2018

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

Re: Opposition to Flawed Background Check Provisions of Bill C-71

I am writing to you today on behalf of the 40,000 members of the BC Wildlife Federation to request that you withdraw Bill C-71 due to the flawed background check provisions.

The BC Wildlife Federation (BCWF) is the oldest and largest conservation organization in British Columbia. The BCWF promotes the conservation and wise use of British Columbia's fish, wildlife and their habitats and is recognized as such by stakeholders' province wide. You should be aware that the BCWF provides the necessary training and safe use of firearms for its members and the public at large through our government approved CORE program.

It is our view that Canadians are already subject to onerous background checks in order to legally possess firearms. The legislation you recently tabled does not appear to take into account the interests of the vast majority of responsible gun owners. The BCWF is interested to know why the existing background check system is a failure to the point of your proposed revisions. We are unaware of problems with the existing legislation.

If your goal is "to end the scourge of criminal and gang violence in our communities" then I would like to suggest that addressing the criminal possession and misuse of guns would be a far better objective to achieve. Such an effort would be a better investment and provide better outcomes in terms of the public attitude to firearms rather than equating them with criminals

In closing, I urge you not to proceed with legislation that penalizes Canada's law-abiding firearms owners and does very little to improve public safety.
Thank you for your consideration in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Harvey Andrusak".

Harvey Andrusak
President
BC Wildlife Federation



Copies to:

The Rt. Hon. Justin Trudeau, P.C., M.P.
80 Wellington Street
Ottawa, ON, K1A 0A2

All BC Members of Parliament

Federal Party Leaders

Members of the Federal Parliamentary Standing Committee on Public Safety and National Security



April 27, 2018

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

Re: Complaint – Breach of Contract and Violation of Ethics Protocol

I am writing to you today on behalf of the 40,000 members of the BC Wildlife Federation to signal our deep concerns about what I believe to be a serious conflict of interest and ethics violation by an appointed member of the Canadian Firearms Advisory Committee. The member is Vice Chair Nathalie Provost, current spokesperson and former lobbyist for PolySeSouvient.

As the result of investigation and recent documents acquired through the Right to Information Act, I would like to submit the following:

Ms. Natalie Provost is a lobbyist and spokesperson for the organization PolySeSouvient (Poly Remembers) from Quebec that opposes lawful civilian firearms ownership.

She was appointed by Minister Goodale, Public Safety Canada, to the Canadian Firearms Advisory Committee (CFAC) sometime in 2016 or early 2017.

On January 26th, 2017, Ms. Provost signed a contract/agreement and ethics agreement, to suspend and not partake in any type or form of firearms related lobbying, campaigning etc. A copy of this document signed by her is attached for your review.

(<https://drive.google.com/file/d/1pvMFjrgodpQr3-LPBVmjfoGvFqpoU4m/view>)

As of March 5th, 2018, in direct violation of her signed contract/agreement, Poly Remembers (or PolySeSouvient) raised \$2,185.00 in two days from 14 donors in a GoFundMe.com campaign to help ban many popular semi-automatic rifles in Canada. (<https://thegunblog.ca/2018/03/05/group-aims-ban-semi-auto-rifles-raises-2185-14-donors/>)

On November 24th, 2017, 10 months after signing the above-mentioned contract/agreement, Ms. Provost submitted a document to Public Safety Canada on behalf as a lobbyist and spokesperson for the Poly Remembers anti-firearms organization. This document includes seven submissions that Poly Remembers wanted included in Bill C-71 to amend present Canadian firearm laws. In addition to these seven submission there was other biased information included that reveals an emotional rejection of law-abiding firearms owners.

I would add that five of these proposed submissions were included in Bill C-71 as the result of her lobbying. A copy of this document, signed by her is attached. For your review. (https://drive.google.com/file/d/1YWewue4z16a1liILTZF_8BLlaEneDTd/view).

As can be seen, it is very well documented and blatantly apparent, that Ms. Provost has committed a serious conflict of interest. She has breached ethics standards, knowingly and willingly, being well aware that she was in contravention of the CFAC contract she signed and other ethical regulations and guidelines.

I would also submit that the Public Safety Canada, Minister Goodale and members of his staff were aware of this conflict of interest and her blatant disregard of ethics standards. The Ministry knowingly allowed this conflict to happen and to continue, without sufficient due diligence. It is even possible that they may have deliberately allowed this conflict to occur.

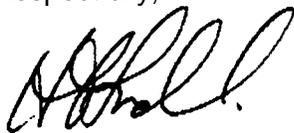
Ms. Provost unethical actions have discredited the CFAC and herself. She has betrayed the law-abiding firearms community and the Canadian public with her dishonest behavior.

I request the following be implemented:

- 1) I request that Ms. Provost be immediately removed from her position and any dealings with CFAC and any other government organization, agency, committee related to firearms.
- 2) Any submissions, suggestions, information whatsoever by her or Poly Remembers to CFAC be removed and discounted.
- 3) Ms. Provost have her lobbyist status removed because of her unethical and dishonest conduct.
- 4) Any government funding to Ms. Provost, Poly Remembers and/or its offshoots be reviewed and discontinued for this breach of ethics.
- 5) Action should be taken by the ethics commissioner to investigate her behavior and that of Public Safety Canada who knowingly allowed her to do this and let it continue unabated.

I look forward to receiving your reply and reports of any actions being considered or conducted relating to my complaint.

Respectfully,



Harvey Andrusak
President
BC Wildlife Federation

References:

- (1) <https://thegunblog.ca/2018/03/05/group-aims-ban-semi-auto-rifles-raises-2185-14-donors/>
- (2) <https://drive.google.com/file/d/1pvMFjgrgodpQr3-LPBVmjfoGvFqpoU4m/view>
- (3) https://drive.google.com/file/d/1YWewue4zl6a1liLTZF__8BLlaEneDTd/view



May 3, 2018

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

Re: Opposition to Backdoor Gun Registry Provisions of Bill C-71

I am writing to you today on behalf of the 40,000 members of the BC Wildlife Federation to request that you withdraw Bill C-71 due to Gun Registry provisions.

The BC Wildlife Federation (BCWF) is the oldest and largest conservation organization in British Columbia. The BCWF promotes the conservation and wise use of British Columbia's fish, wildlife and their habitats and is recognized as such by stakeholders' province wide. You should be aware that the BCWF provides the necessary training and safe use of firearms for its members and the public at large through our government approved Conservation Outdoor Recreation Education (CORE) program.

Under the new legislation, companies that sell firearms will be required to keep detailed records of firearm sales, as well as firearm purchasers. It is the BCWF's view that this measure will essentially force businesses to operate a "gun registry system" for government. This is contrary to the government's election promise and represents an indirect tax on firearms owners by driving up costs for business.

If your goal is "to end the scourge of criminal and gang violence in our communities" then I would like to suggest that addressing the criminal possession and misuse of guns would be a far better objective to achieve.

In closing, I urge you not to proceed with legislation that penalizes Canada's law-abiding firearms owners and does very little to improve public safety.

Thank you for your consideration in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Harvey Andrusak".

Harvey Andrusak
President
BC Wildlife Federation



Copies to:

All BC Members of Parliament

Federal Party Leaders

Members of the Federal Parliamentary Standing Committee on Public Safety and National Security



May 11, 2018

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

Dear Minister Goodale,

Re: Bill C-71 Based on Flawed Assumptions

Bill C-71 is based on “fake news”, non-existent science and misleading use of statistics, and should be immediately withdrawn.

I am writing to you today on behalf of the 40,000 members of the BC Wildlife Federation to protest your declaration that Bill C-71 is a “practical, common-sense approach” to public safety. Bill C-71 is based upon fundamentally flawed assumptions, increases the complexity of the regulations that law-abiding Canadians must deal with, and does not in any way restrict the supply of firearms to gang members.

Despite police innuendo, hunters and sport shooters are not a major source for gangsters’ firearms. Criminals do not get their firearms from law-abiding Canadians. At the height of the long-gun registry, only 9% of firearms involved in homicides were registered (135 out of the 1,485 firearms homicides from 2003 to 2010), in other words, only 3% of the 4,811 total homicides involved registered firearms Statistics Canada revealed in a Special Request. [1]

All reputable research indicates that gang crime is driven by smuggled firearms that is part of the illegal drug trade. Analyses of guns recovered from criminal activity in Toronto, Ottawa, Vancouver and the Prairie Provinces show that between two-thirds and 90% of guns involved in violent crime had been smuggled into Canada. [2]

Despite Statistics Canada’s admissions to the Guns and Gangs Task Force that “*We don’t know the origin of firearms involved in gun crime,*” the police insist on claiming there has been.

“...*a shift in the source of firearms used by gang members...However more recently, it has been noticed that the majority of firearms being apprehended had originated in Canada.*” [3]

The RCMP claim is based on a misleading use of statistics as they have redefined “crime guns” to include “any firearm illegally acquired.” This means guns **not** used in criminal violence are included as “crime guns.” “Crime guns” now include firearms apprehended from homes of suicides and any Canadian who forgets to renew his or her Possession and Acquisition Licence (PAL). The new police definition is much broader than the traditional definition of “crime guns” that was limited to firearms used (or suspected of being used) in violent crimes. [4]

Canada has a gang problem, not a gun problem. Criminal violence is driven by a small number of repeat offenders, not by the millions of Canadians who legally own firearms. High-quality, peer-reviewed research by criminologists and economists has consistently shown that firearms legislation focused on general ownership fails to reduce rates of criminal violence. [5]

Bill C-71 is barking up the wrong tree. Licensed gun owners (Possession and Acquisition Licence holders) pose no threat to public safety. PAL holders had a homicide rate lower (0.60 per 100,000 licensed gun owners) than the national homicide rate (1.85 per 100,000 people the general population). [6]

Despite assurances that “... *C-71 will be complemented by other measures...*” the BCWF does not accept that Bill C-71 contributes in any way to dealing with the problems of “guns and gangs.” Hunters and sport shooters do not participate in or further violent crime; on the contrary, we contribute to public safety through positive means such as teaching firearms safety

I look forward to receiving your response to our concerns.

Yours in conservation,



Harvey Andrusak
President
BC Wildlife Federation

Copies to:

All BC Members of Parliament

Members of the Federal Parliamentary Standing Committee on Public Safety and National Security

References

[1] Professor Gary Mauser. Presentation to the Canadian House of Commons, Standing Committee on Public Safety, C-19. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2015724

[2] Professor Gary Mauser. A Presentation to Senate Committee on Legal and Constitutional Affairs, The Senate of Canada. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2040531

[3] RCMP. 2014 Annual Report Western Region. Canadian Firearms Program. Firearms Investigative and Enforcement Services Directorate. Firearms Operations and Enforcement Unit. Copy received 7 April 2018.

[4] Mauser, G. Bill C-71 is a Red Herring. Submission to the Parliamentary Standing Committee on Public Safety and National Security on Bill C-71.

[5] Langmann, C. Submission to the Parliamentary Standing Committee on Public Safety and National Security on Bill C-71.

[6] Homicide in Canada, 2016. <http://www.statcan.gc.ca/pub/85-002-x/2017001/article/54879-eng.htm>