NEW BRUNSWICK WILDLIFE FEDERATION'S POSITION REGARDING BILL C-71

The following is a position paper concerning Bill C-71 which has been prepared by members of the New Brunswick Wildlife Federation (NBWF) and concurred with by the Board of Directors.

Background:

Bill C-71 "An Act to amend certain Acts and Regulations in relation to firearms" was introduced for first reading in the House of Commons (Canada) on March 20, 2018.

This Bill proposes amendments to *Ending the Long-gun Registry Act, Access to Information Act, the Privacy Act, the Criminal Code and the Firearms Act.* This Bill also directs the *Commissioner of Firearms* to provide the Government of Quebec with records of long gun registrations of the now defunct Long-Gun Registry (at their request).

Bill C-71 has now passed two out of three readings in the House of Commons and is now being reviewed by the *Standing Committee on Public Safety & National Security*. It will also be reviewed by a Senate Committee which has the power to request amendments.

Branch members of the NBWF located within the Federal Riding of Fundy-Royal first became involved with this issue early in June of 2017. This was the direct result of the introduction of Bill C-47 which was introduced on May 28, 2017 and Bill C-52 which was introduced on June 9, 2017.

Bill C-47 concerned the implementation of the *Firearms Marking Regulations* which had been promulgated in 2004 but put on hold by the previous Conservative Government. The intention was to implement these regulations or put them into force through Bill C-47.

Bill C-52 concerned turning over of the National Long-Gun Registry statistics to the Province of Quebec. Quebec was in the process of creating their own provincial long-gun registry.

As a result the NBWF Branch forwarded a letter protesting both of these Bills to MP Alaina Lockhart (Fundy-Royal Riding) on June 19, 2017. This resulted in a meeting with a representative of the Branch on August 1, 2017. At this meeting MP Lockhart indicated that she desired to organize a Committee of hunting and shooting organizations within her riding to discuss firearms issues and to educate her on firearms issues.

As a result the newly formed Committee met with MP Lockhart on October 13, 2017. The Committee at that time consisted of 2 representatives from each of the following Branches of the NBWF:

- 1. Petitcodiac Sportsman's Club
- 2. Shepody Fish & Game
- 3. Sussex Fish & Game
- 4. Havelock Sportsmen's Club
- 5. Canaan Fish & Game
- 6. Albert County Hunters Association

Note: At a later date the Hampton Rifle & Pistol Club joined this Committee although they are not a Branch of the NBWF. This Club has 500 or more active members and is located in the Fundy-Royal Riding.

This Committee met with MP Lockhart on October 17, 2017, February 23, 2018 and April 13, 2018. After each meeting a report was forwarded to MP Lockhart indicating clearly the Committee's position and concern with all issues discussed.

At the October 17, 2017 MP Lockhart presented her party's firearms platform that she said they had put together and distributed to the general public during the last election. It reads as follows:

We will take action to get handguns and assault weapons off of our streets.

Over the last decade, Stephen Harper has steadily weakened our gun laws in ways that make Canadians more vulnerable and communities more dangerous.

We will take pragmatic action to make it harder for criminals to get, and use, handguns and assault weapons. We will:

- Repeal changes made by Bill C-42 that allow restricted and prohibited weapons to be freely transported without a permit, and we will put decision-making about weapons restrictions back in the hands of police, not politicians
- Provide \$100 million each year to the provinces and territories to support guns and gangs task forces to take illegal guns off of our streets and reduce gang violence;
- Modify the membership of the Canadian Firearms Advisory Committee to include knowledgeable law enforcement officers, public health advocates, representatives from women's groups and members of the legal community
- Require enhanced background checks for anyone seeking to purchase a handgun or other restricted firearm;
- Require purchasers of firearms to show a licence when they buy a gun, and
 require all sellers of firearms to confirm that the licence is valid before completing
 the sale; Require firearms vendors to keep records of all firearms inventory and
 sales to assist police in investigating firearms trafficking and other gun crimes;

- Immediately implement the imported gun marking regulations that have been repeatedly delayed by Stephen Harper;
- As part of our investment in border infrastructure, invest in new technologies to enhance border guards' ability to detect and halt illegal guns from the United States entering into Canada.
- We will not create a new national long-gun registry to replace the one that has been dismantled.
- We will ensure that Canada becomes a party to the International Arms Trade Treaty.

It is extremely important to note that none of the Committee members in attendance at this meeting had any knowledge of this platform prior to MP Lockhart introducing it to them. The Committee told MP Lockhart that should they have been made aware of this platform prior to the election there may have been a different election outcome in her riding.

Short History of Recent Firearms Control in Canada:

1977

Bill C-51 passed in the House of Commons. It then received Senate approval and Royal Assent on August 5. The two biggest changes included requirements for Firearms Acquisition Certificates (FACs) and requirements for Firearms and Ammunition Business Permits. And, for the first time, Chief Firearms Officer positions were introduced in the provinces. Other changes included provisions dealing with new offences, search and seizure powers, increased penalties, and new definitions for prohibited and restricted weapons. Fully automatic weapons became classified as prohibited firearms unless they had been registered as restricted weapons before January 1, 1978. Individuals could no longer carry a restricted weapon to protect property. Mandatory minimum sentences were re-introduced. This time, they were in the form of a 1-14 year consecutive sentence for the actual use (not mere possession) of a firearm to commit an indictable offence.

1978

All of the provisions contained in Bill C-51 came into force, except for the requirements for FACs and for Firearms and Ammunition Business Permits.

1979

The requirements for FACs and Firearms and Ammunition Business Permits came into force. Both involved the screening of applicants and record-keeping systems. Provinces were given the option of requiring FAC applicants to take a firearm safety course.

1990

Bill C-80 was introduced but died on the Order Paper. (Many of the proposals contained in Bill C-80 were later included in Bill C-17). Among the major changes proposed by Bill

C-80 were: the prohibition of automatic firearms that had been converted to semiautomatics to avoid the 1978 prohibition; the creation of new controls for other types of military or para-military firearms; and better screening of FAC applicants.

1991-1994

Bill C-17 was introduced. It passed in the House of Commons on November 7, received Senate approval and Royal Assent on December 5, 1991, then came into force between 1992 and 1994. Changes to the FAC system included requiring applicants to provide a photograph and two references; imposing a mandatory 28-day waiting period for an FAC; a mandatory requirement for safety training; and expanding the application form to provide more background information. Bill C-17 also required a more detailed screening check of FAC applicants.

The Bill C-17 requirement for FAC applicants to show knowledge of the safe handling of firearms came into force in 1994. To demonstrate knowledge, applicants had to pass the test for a firearms safety course approved by a provincial Attorney General, or a firearms officer had to certify that the applicant was competent in handling firearms safely.

Bill C-17 added a requirement that safety courses had to cover firearms laws as well as safety issues.

After the 1993 federal election, the new Government indicated its intention to proceed with further controls, including some form of licensing and registration system that would apply to all firearms and their owners. Provincial and Federal officials met several times between January and July to define issues relating to universal licensing and registration proposals.

Between August 1994 and February 1995, policy options were defined for a new firearms control scheme, and new legislation was drafted.

1995

Bill C-68 was introduced on February 14. Senate approval and Royal Assent were granted on December 5, 1995. Major changes included:

- *Criminal Code* amendments providing harsher penalties for certain serious crimes where firearms are used (e.g., kidnapping, murder);
- the creation of the *Firearms Act*, to take the administrative and regulatory aspects of the licensing and registration system out of the *Criminal Code*;
- a new licensing system to replace the FAC system; licences required to possess and acquire firearms, and to buy ammunition;
- registration of all firearms, including shotguns and rifles.

The Chief Firearms Officer was tasked with issuing firearm licences, and the Firearms Registrar, registration certificates. The Registrar is responsible, among other things, for registering firearms owned by individuals and businesses.

Provision was also made in the *Firearms Act* for the appointment of ten Chief Firearms Officers, that is, one for each province, with some provinces also including a territory. Chief Firearms Officers can be appointed by the provincial or the federal government. Be they appointed federally or provincially, Chief Firearms Officers are responsible for such things as issuing, renewing, and revoking Possession and Acquisition Licences.

1996

The provisions requiring mandatory minimum sentences for serious firearms crimes came into effect in January. The Canada Firearms Centre (CFC) was given the task to develop the regulations, systems and infrastructure needed to implement the *Firearms Act.* CFC officials consulted extensively with the provinces and territories, and with groups and individuals with an interest in firearms, to ensure that the regulations reflected their needs as much as possible.

1997

In January and February, public hearings on the proposed regulations were held by the House of Commons Sub-Committee on the Draft Regulations on Firearms, of the Standing Committee of Justice and Legal Affairs, and by the Senate Legal and Constitutional Affairs Committee. Based on the presentations that were made, a number of recommendations were made for improvements to the regulations. These recommendations were to clarify various provisions and to give more recognition to legitimate needs of firearms users. The Committee also recommended that the government develop a variety of communications programs to provide information on the new law to groups and individuals with an interest in firearms.

In April, the Minister of Justice tabled the government's response, accepting all but one of the Committee's 39 recommendations. The government rejected a recommendation for an additional procedure in the licence approval process.

In October, the Minister of Justice tabled some amendments to the 1996 regulations. She also tabled additional regulations at that time, dealing with:

- firearms registration certificates;
- exportation and importation of firearms;
- the operation of shooting clubs and shooting ranges;
- gun shows;
- special authority to possess; and
- public agents.

1998

The regulations were passed in March. The *Firearms Act* and regulations were scheduled to be phased in starting December 1, 1998. The Canadian Firearms Registry was transferred from the Royal Canadian Mounted Police to the Department of Justice.

2001

As of January 1, 2001, Canadians needed a licence to possess and acquire firearms.

2003

As of January 1, 2003, individuals needed a valid licence and registration certificate for all firearms in their possession, including non-restricted rifles and shotguns. Firearms businesses also required a valid business licence and registration certificate for all firearms in their inventory.

The Canada Firearms Centre was transferred from the Department of Justice on April 14, 2003, and became an independent agency within the Solicitor General Portfolio.

On May 13, 2003, Bill C-10A, *An Act to Amend the Criminal Code (Firearms) and the Firearms Act* received Royal Assent. Statutory authority of all operations was consolidated under the Canadian Firearms Commissioner, who reported directly to the Solicitor General, now known as the Minister of Public Safety and Emergency Preparedness Canada.

A Commissioner of Firearms, who has overall responsibility for the administration of the program, was appointed.

2006

Responsibility for the administration of the *Firearms Act* and the operation of the Canada Firearms Centre was transferred to the RCMP in May 2006. The Commissioner of the RCMP assumed the role of the Commissioner of Firearms.

In June, 2006, Bill C-21, *An Act to Amend the Criminal Code and the Firearms Act*, was tabled, with the intent of repealing the requirement to register non-restricted long guns. It dies on the order paper.

2007

Bill C-21 was re-introduced as Bill C-24.

2008

The RCMP amalgamated their firearms-related sections, the Canada Firearms Centre and the Firearms Support Services Directorate, into one integrated group, the Canadian Firearms Program (CFP).

Bill C-24, like its predecessor, Bill C-21, died on the order paper in September 2008.

The remainder of the *Public Agents Firearms Regulations* came into force on October 31, 2008. Police and other government agencies that use or hold firearms were required to report all firearms in their temporary or permanent possession.

2011

On October 25, the Minister of Public Safety and Emergency Preparedness introduced

Bill C-19, An Act to amend the Criminal Code and the Firearms Act (Ending the Longgun Registry Act).

2012

On April 5, Bill C-19, the *Ending the Long-gun Registry Act*, came into force. The bill amended the *Criminal Code* and the *Firearms Act* to remove the requirement to register non-restricted firearms, ordered the destruction of existing registration records and allowed the transferor of a non-restricted firearm to obtain confirmation of the validity of a transferee's firearms acquisition licence prior to the transfer being finalized.

Shortly after, the Government of Quebec filed a court challenge to Bill C-19. Due to a series of court orders and undertakings in these proceedings, non-restricted firearms registration records for the province of Quebec were retained, and Quebec residents continued to register non-restricted firearms.

In October, all non-restricted firearms registration records, except for Quebec, were destroyed.

2015

On March 27, the Supreme Court of Canada dismissed Quebec's appeal challenging the constitutionality of the provisions of the *Ending the Long Gun Registry Act* requiring destruction of the non-restricted registration records, and refused to order the transfer of these records to the Province of Quebec. As a result, the Canadian Firearms Program stopped accepting and processing registration/transfer applications for non-restricted firearms from within the province of Quebec, and all electronic records identified as being related to the non-restricted firearms registration records in Quebec were deleted.

On June 18, Bill C-42,the <u>Common Sense Firearms Licensing Act</u>, received royal assent, and the following provisions of that Act came into force: The Act amended the *Firearms Act* and *Criminal Code* to make classroom participation in firearms safety courses mandatory for first-time licence applicants; provide for the discretionary authority of Chief Firearms Officers to be subject to the regulations; strengthen the *Criminal Code* provisions relating to orders prohibiting the possession of firearms where a person is convicted of an offence involving domestic violence; and, provide the Governor in Council with the authority to prescribe firearms to be non-restricted or restricted.

On September 2, two additional provisions of the *Common Sense Firearms Licensing Act* came into force: the elimination of the Possession Only Licence (POL) and conversion of all existing POLs to Possession and Acquisition Licences; and the Authorization to Transport becoming a condition of a licence for certain routine and lawful activities. Other provisions of the Act which create a six month grace period at the end of a five year licence, and permitting the sharing of firearms import information when restricted and prohibited firearms are imported into Canada by businesses, are not yet in force.

2018

The Province of Quebec creates their own long-gun registry after the Quebec Superior Court rules they have the right to do so.

Bill C-71 Issues & Concerns:

Note: Whenever government desires to arouse the concerns of the non-gun owning public they use the term "weapons" rather than "firearms". We have and will continue to advise the government that hunters and recreational shooters do not use the term "weapon" when referring to their "firearms".

Authorization to transfer non-restricted firearms:

Subsection 23(1) of Bill C-71 – all transfers of non-restricted firearms (shotguns, rifles) must be approved by the REGISTRAR of firearms through the obtaining of a reference number.

Comments: Although we have been told by the federal government that this will involve a verification to see if the person receiving the firearm still has a valid PAL it is believed that this will involve a complete revisit of all of the conditions that the person must meet to obtain a PAL. Most certainly "the devil is in the details". Although attempts were made to try and ascertain what exactly the person wishing to transfer a firearm will have to provide to the REGISTAR no concrete response was received from the government.

There has also been conflicting information from the Chief Firearms Officer (CFO) in New Brunswick in respect to this issue. At a meeting with a firearms group in Fredericton the CFO stated that information regarding the seller and buyer as well as the firearm identification information would be required before issuing a reference number. In addition the CFO stated that the seller would be required to keep a record of all of the transfer information for a period of ten (10) years. This information would have to be maintained in a "white book" and that this book would be supplied by the CFO. Note that the CFO stated that the Centre would be closed on weekends which would certainly prevent any transfers at that time and totally shut down Gun Shows.

Since the current *Firearms Act* contains provisions authorizing the Minister of Public Safety and Emergency Preparedness through the Governor in Council to make regulations the NBWF has no idea of where this could end. Note that the current regulations already made under the *Firearms Act* make it very easy for the government to put almost any procedure that they desire in place. These regulations include, but are not limited to the following; *Authorizations to Transport Restricted Firearms and Certain Handguns; Conditions of Transferring Firearms and Other Weapons Regulations; Firearms Fees Regulations; Firearms Information Regulations (Non*

Restricted Firearms); Firearms Licensing Regulations; Firearms Marking Regulations; Firearms Records Regulations; etc.

So with the passage of Bill C-71 comes the potential for the government to put in place all sorts of onerous regulations that would make life miserable for legal gun owners.

The government has not been forthcoming with the exact methods that will be used and that result in the issuance of a reference number even though we have made several attempts to get to the bottom of this issue.

We were also unable to obtain information, statistics or otherwise that support exactly why the government finds it necessary to burden Canadian gun owners. Have we been transferring non – restricted firearms illegally? Where are the statistics?

The NBWF strongly believes that this is one of the steps to create a back door long gun registry regardless of their commitment not to create another National Long-Gun registry.

What is the cost of this effort? It will most definitely require a great deal of financial and human resources to implement this one item. Even though we have asked to be supplied with a cost-benefit analysis it has not been forthcoming.

Business Records:

Firearms Businesses will also be required to maintain records of all sales for at least 20 years after obtaining a similar reference number. Although it is believed that these records plus the records of individual transfers will form the basis of a back door long gun registry the government says "not so".

The government says that the information gathered from individuals and businesses can only be obtained after a warrant has been issued. It appears however, that they conveniently forgot about subsection 102(1) of the *Firearms Act*.

Inspection:

- 102 (1) Subject to section 104, for the purpose of ensuring compliance with this Act and the regulations, an inspector may at any reasonable time enter and inspect any place where the inspector believes on reasonable grounds a business is being carried on or there is a record of a business, any place in which the inspector believes on reasonable grounds there is a gun collection or a record in relation to a gun collection or any place in which the inspector believes on reasonable grounds there is a prohibited firearm or there are more than 10 firearms and may
 - (a) open any container that the inspector believes on reasonable grounds contains a firearm or other thing in respect of which this Act or the regulations apply;

- (b) examine any firearm and examine any other thing that the inspector finds and take samples of it;
- o (c) conduct any tests or analyses or take any measurements; and
- (d) require any person to produce for examination or copying any records, books of account or other documents that the inspector believes on reasonable grounds contain information that is relevant to the enforcement of this Act or the regulations.
- Marginal note: Operation of data processing systems and copying equipment
 - (2) In carrying out an inspection of a place under subsection (1), an inspector may
 - (a) use or cause to be used any data processing system at the place to examine any data contained in or available to the system;
 - (b) reproduce any record or cause it to be reproduced from the data in the form of a print-out or other intelligible output and remove the printout or other output for examination or copying; and
 - (c) use or cause to be used any copying equipment at the place to make copies of any record, book of account or other document.

Comments: As you can easily see by reading this provision an inspector can inspect any place where the inspector believes on reasonable grounds there is a gun collection or a record pertaining to firearms or more than 10 firearms to inspect; and, in doing so examine these records, take samples, conduct tests and/or make copies, etc. All of this without a warrant. The inspector can do this to ensure compliance with the Act and the regulations.

Surely this is a back door long-gun registry.

Enhanced Background Checks for those renewing PAL's:

The previous focus of five (5) years is now gone. The focus is now on the life of the individual renewing his/her PAL. This means declaring all previous events that a person has been involved with. It will be necessary to declare all previous incidents of depression, assault, marital disputes, divorces, etc. regardless when they happened.

The possibility of this occurring has already created a worry for some. An individual who had committed a violation 27 years past but has had no infractions or bad reports since that time would most definitely be reviewed and possibly result in being refused or at least delayed when renewing a PAL.

How will this affect those attempting to obtain a reference number to obtain a new or used firearm? No one knows for sure.

Where will the human resources come from to run this program? How much will this cost the taxpayers of Canada?

Was there a problem with the current five (5) year focus? Where are the statistics to warrant this and where is the cost-benefit analysis?

<u>Authorizations to Transport (Restricted & Prohibited):</u>

Although we will be permitted to transport restricted and prohibited firearms to and from approved ranges as well as from point of sale to home we have lost the right (privilege?) to transport to a gunsmith, to a firearms business and/or a gun show.

Why? How did we mess up? Are there statistics to show that we misused this right/privilege? If yes, why were they not provided?

How will this be done? What sort of an administrative backlog will be created to put this in place?

Several possibilities have been identified but there has been no consistency at all in the information provided by government sources.

Where will the financial and human resources come from to achieve this poorly considered idea?

Has a cost-analysis been created? If yes, where is it?

So- Called "Black Rifles" Prohibition & Classification:

The authority of the government to downgrade or upgrade the classification of firearms (prohibited to restricted) or vice versa is now gone and rests solely with the RCMP. Any classifications made by the RCMP cannot be overturned by the government. The RCMP have demonstrated a history of errors when classifying firearms in the past and we question why the power of elected officials has been removed.

To whom do we appeal should we disagree with the classification work of the RCMP? Oversight by our elected officials must be maintained.

It appears that the RCMP are already putting this provision in place although the Bill has not yet been made law. It appears that the RCMP are informing owners of CZ and Swiss Arms rifles that they must register these rifles with the Police by June 30, 2018. If they do not they may lose the benefit from delayed confiscation offered by Bill C-71. This is incredible and should not be tolerated.

UN MARKING REGULATIONS:

Although Bill C-71 does not address the reinstating of the *Firearms Marking Regulations* the government announced at the time Bill C-71 was introduced (March 20, 2018) that these regulations would come into force through a technical amendment. The NBWF considers these regulations as a part of the total firearms package which were originally part of Bill C-47 that has been previously mentioned in the background portion of this document.

These regulations were first introduced in 2004 but were never put in force. These regulations are widely known as the UN Firearms Marking Regulations.

These regulations have been postponed for 11 consecutive years by 3 separate governments for one simple reason: No government wanted to be responsible for killing Canada's legitimate civilian firearm industry. Until now.

For most of us, the United Nations Firearm Marking scheme is an esoteric set of rules that really have little meaning for regular Canadian gun owners. The common refrain we hear is this: "So what if the gun has an extra marking on it. That doesn't mean anything to me."

If you don't care about paying an extra couple of hundred dollars for every single gun you purchase, then you are absolutely correct. The UN Firearm Marking scheme means nothing to you.

However, most Canadians are not so eager to fork over an extra \$200 on each new firearm they purchase. Under the UN Marking scheme, an inexpensive firearm that is worth \$150 today would, because of UN Marking, become a \$350 firearm after these regulations come into force.

In short, this means every single firearm imported into Canada must have "Canada" or "CA", a serial number, the manufacturer's name (on the receiver) and a two-digit code for the year it was imported.

Canada imports roughly 350,000 firearms every year. If these regulations come into force every single firearm imported must have this information engraved on its receiver in plain view.

In addition some of our importers have threatened to discontinue importing firearms into Canada if these regulations are implemented since Canada is a very small portion of their business.

We are not clear as to how these regulations could assist the government to fight gun crime since currently all legal firearms imported contain a serial number, name of manufacturer and country of origin.

Currently these regulations are on hold although the government has not provided any additional information concerning their future plans in this regard. How long will they be on hold?

Provincial Long- Gun Registry - Quebec:

Bill C-71 and in particular section 29 of this Bill directs the Commissioner of Firearms to provide the government of Quebec with a copy of all records that were in the Canadian Firearms Registry on April 3, 2015 and that relate to firearms registered, as of that day, as non-restricted firearms.

It is very important to note that all of these records were supposedly destroyed as testified to by RCMP Deputy Commissioner Henschel before a Commons Committee in 2005. Despite efforts to get to the bottom of this issue the government has never explained how there are records still in existence.

It is also important to note that section 29 of Bill C-71 relates to all records, not just the Quebec records.

In addition the federal government has done absolutely nothing to prevent the Quebec Provincial Government from establishing a long-gun registry which is most certainly a responsibility of the federal government only.

The NBWF believes that this establishes a dangerous precedent and have fears that cash-strapped provinces such as New Brunswick may establish a similar long-gun registry with federal grant dollars being offered as an incentive.

The NBWF does not wish to see taxpayers dollars presented to any province in order to facilitate the establishment of a provincial long-gun registry.

Summary & Conclusion:

When introducing this Bill, the Minister of Public Safety & National Security (Ralph Goodale) stated that this Bill is an effort to curtail guns and gang-related violence; yet Bill C-71 does not mention "gang" or "organized crime" even once. Bill C-71 does use the word "licence" 35 times and the word "registrar" almost the same number of times. So, the NBWF strongly believes that this Bill has nothing to do with guns and gangs but is simply additional restrictions on law-abiding hunters and recreational shooters. It is indeed a back-door long-gun registry.

Minister Goodale says that after the shootings in Vegas and Florida Canada had to do something. Note: This statement is not verbatim. It is incredible that our government is penalizing hunters and recreational shooters in Canada based on firearm violence in another country.

Minister Goodale also said that the Provinces and Territories were all "on board" with this Bill. It is important to note that the Province of New Brunswick, who seemingly were

advised of this Bill has never consulted with the NBWF or any other groups to the best of our knowledge. Considering that New Brunswick has approximately 70,000 licensed gun owners it is unthinkable that our provincial government has not consulted with us.

As previously identified this Bill will require a considerable financial investment by tax payers yet no cost-benefit analysis has been forthcoming. Will this be another \$2 Billion dollar fiasco like the old long-gun registry was?

In addition Minister Goodale's office has told us there is more to come. i.e. more stringent commercial storage rules for firearms businesses; stringent advertising regulations that they believe allows for the glorification of guns; mechanisms to identify large and unusual transactions by licensed firearms owners; changes to allow medical professionals to easily report diagnosed conditions to authorities, etc.

Minister Goodale also stated that 69% of Canadians in rural areas support an outright ban on firearms. Can this be true? Where exactly did this survey occur? How many Canadians took part? What exactly were the questions asked? We have asked these questions and received no response from the government.

We know how statistics can be used to either support or oppose a political position. If Canadians think this way it is because our governments have done a poor job of educating the general public on the legislated requirements that gun owners currently face in Canada.

The NBWF realizes that due to the majority position of the existing federal government that this Bill will likely become law sometime in 2018. Although some opponents to this Bill are requesting amendments the NBWF is not. **The NBWF desires to see Bill C-71 struck down in its entirety.**

While it may seem unlikely that Bill C-71 will be withdrawn completely remember that most Canadians thought that the small business tax bill of 2017 was a done deal, but in the end the government backed down. Recently a large group of hunters and shooters were invited to attend a roundtable discussion on Bill C-71 where Andrew Scheer (Leader of the Federal Conservative Party & Leader of the Official Opposition) was the guest speaker. Mr. Scheer promised that should his Party form the next government that he would immediately take the steps to revoke Bill C-71.

The NBWF does not wish to make this a political issue and notes that we have worked with all political parties in the past and hope to be able to do so in the future. Having said this we do realize that we have taken a position as opposing totally Bill C-71 which has been put forward by the Federal Government of Canada which is currently Liberal.

The NBWF is not against efforts to assist our Border Services in the detection of illegal guns entering Canada or to bolster the efforts of law enforcement authorities to detect

and prevent violent crimes. Any efforts aimed at the so-called "guns" and "gangs" is not only welcomed it is required. However, hunters and recreational shooters are not the enemy.

Hunters and recreational shooters are appalled by gun violence and mass shootings in Canada and all countries, but again we are not the enemy.

In closing it is important to note that this document is not all inclusive. Some of the issues have not been totally exhausted. It is hoped that this document will serve to explain fully the position of the NBWF regarding Bill C-71 and also serve as an educational tool for all who read it.

While the NBWF continues to hope for the total withdrawal of this Bill at the very least we would hope that the Prime Minister of Canada would allow his MP's to vote freely on this issue. It is expected that many Liberal MP's would vote against this Bill should it be a free vote, at least those MP's who are in the rural areas of Canada.