



The Alberta Fish & Game Association
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March 29, 2017

The Honorable Ralph Goodale, Member of Parliament
Minister of Public Safety
House of Commons
Ottawa, Canada
K1A 0A6

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

On behalf of the 25,000plus members of the Alberta Fish and Game Association (AFGA) I am expressing our concern over the “Marking of Imported Firearms (Bill C-10A) Regulations”, as currently drafted. It will have a negative impact on Canadians who are active conservationists through the activity of hunting by significantly increasing costs and reducing choice. It is also likely that it will have a disastrous impact on the Canadian firearms industry and result in the unnecessary loss of jobs and hurt trading relationships with other countries. I request that you amend the Regulations to reflect the modern firearms marking system that is already being followed in Canada.

The goal of the UN Firearm Marking protocol is to ensure every firearm can be tracked back to its point of origin. The protocol does not specify how that marking is to be accomplished, preferring to leave the entire implementation process up to individual party states. All of the information required by the UN Firearms Marking Protocol is already available quickly and easily using the existing firearm markings and the systems in place to track their movement from point of manufacture to their final destination at one of Canada’s firearm importers. Requiring the addition of markings that provide no useful information will unnecessarily add exorbitant costs to every single firearm imported into Canada.

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

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

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

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

Before implementing the Marking of Imported Firearms Regulations on June 1, 2017, I respectfully encourage the government to amend the regulations to reflect current practices which already meet all of the objectives of the UN Firearms Protocol.

Yours in Conservation,

A handwritten signature in blue ink, appearing to read "Doug Butler".

Doug Butler, President
The Alberta Fish and Game Association

cc: The Right Honourable Justin Trudeau
House of Commons
Ottawa, Canada
K1A 0A6

AFGA Executive