

May 2, 2021

Honourable Blaine Pedersen
Minister of Agriculture and Resource Development
Room 358 Legislative Building
450 Broadway
Winnipeg, MB R3C 0V8

Honourable Cameron Friesen
Minister of Justice and Attorney General
Room 104 Legislative Building
450 Broadway
Winnipeg, MB R3C 0V8

Dear Minister Pedersen and Minister Friesen,

The Manitoba Bill C21 Advisory Group that was set up to review the Government of Canada's proposed Bill C21 had the opportunity to meet on multiple occasions. The group's terms of reference were to detail how Bill C21 affects Manitoba and provide feedback to the Province of Manitoba for consideration. The information below provides the results of those meetings.

Manitoba Bill C21 Advisory Group Summary Statement

The Committee recommends the Government of Canada focus on education and safety, increase current enforcement efforts, while taking a tough stance on criminals who are breaking the existing laws, rather than further restricting legitimate firearms ownership by law-abiding residents.

How Bill C21 Affects Manitoba

- Allowing municipalities to implement by-laws restricting law-abiding gun owners will lead to a patchwork of bylaws throughout Canada. This will cause confusion, make criminals out of law-abiding citizens, make it impossible for many Manitobans to continue to participate in legal shooting sports. Allowing municipal firearms by-law(s) will also increase the workload on the provincial court system due to separate ever-changing rules from one municipality to the next. Also, the Association of Manitoba Municipalities does not support this patchwork of municipal by-laws related to firearms (see letter from the Association of Manitoba Municipalities attached). Municipal firearms by-laws will not deter crimes committed with firearms.
- Placing the responsibility to authorize a carry permit with the Commissioner for all of Canada instead of the Chief Firearms Officer within a Province will add unnecessary complexity and restrictions on law-abiding gun owners. It will also pose a safety risk to many remote workers who can no longer obtain a permit or are delayed in receiving a permit.
- Allowing the application for emergency prohibition order by any person against any other person without evidence is very concerning. This can create situations where an individual is making an application against another person to harass that person for self-serving motives. It can also cause people to harass other people by pranking enforcement officials for social media attention (known as “swatting”).
- Bill C21 search and seizure without warrant creates a system of guilty until proven innocent. This is especially concerning when any individual can make a complaint against another individual without even knowing the person.
- Bill C21 creates a negative public image of law-abiding gun owners. Legal gun ownership in Canada is currently heavily regulated, especially for restricted firearms such as handguns. The Bill creates the public perception that criminals using firearms when committing a crime are legal firearm owners, which is not the case.
- Confusion related to the classification and definition of firearms negatively impacts the firearms industry, resource tourism operators, sport and competitive shooters. Firearms dealers are now limiting the types of firearms they stock for fear they may become prohibited. Sport shooters will give up the sport due to the complexity and confusion of the firearms classification system. Non-resident sport shooters, competitors, and hunters will not travel to Canada for events due to the confusing classifications and laws. This negatively impacts Manitoba business and Manitobans ability to participate in a sport.
- The costs of Bill C21 are not known but are estimated between 1.6 – 5 billion dollars. This will divert tax dollars that could be better used for policing, education, and social support programs to prevent organized crime, smuggling, and violent crimes.
- Bill C21 Infringes on the property rights of law-abiding gun owners in Manitoba.
- Bill C21 does not provide any information on how it will affect Indigenous people in Canada.

- Bill C22 eliminates the minimum sentences for certain firearm crimes. This puts criminals back on the street which contradicts the intent of Bill C21.
- Bill C21 does not address the root causes of the social issues that lead to crimes committed by a criminal with a firearm.

Advisory Group Recommendations:

- Manitoba implement changes to The Manitoba Municipal Act like Saskatchewan and Alberta have done that restricts a municipality's ability to pass by-laws related to firearms. For example: Clause 8(1.1) in The Saskatchewan Municipalities Act M36-1 states: "Notwithstanding any other provision of this Act or any other Act or law, a municipality has no power to pass any new bylaws respecting firearms, unless otherwise provided for by regulation".
- Manitoba appoint a Provincial Chief Firearms Officer. A provincially appointed Officer will be better at understanding the needs of Manitoba, more accountable to residents, and be able to respond to inquiries in a timely manner. The provinces of Saskatchewan, Ontario, Quebec, Nova Scotia, and Prince Edward Island already have a Provincially appointed Chief Firearms Officer. The Province of Alberta is currently in the process of appointing a Provincial Chief Firearms Officer.
- Manitoba lobby the federal government to maintain the duty to issue an authorization to carry permit with the Provincial Chief Firearms Officer.
- Manitoba to ensure the Federal Government fulfills its obligations and consults with all Indigenous groups within the province on how Bill C21 will affect them.
- Manitoba form a multi-provincial firearms task group with provinces or territories wanting to take a tough stance on criminals that break laws while protect law-abiding firearms owners.
- Manitoba conduct an education campaign directed to the general public informing the public on the strict rules related to firearm ownership already in place.
- Manitoba conduct an education campaign related to the classification and definition of firearms to remove some of the confusion created by the complex classification system.
- Manitoba lobby the Government of Canada to provide the methodology related to classification and definition of firearms.
- Manitoba lobby the Government of Canada to establish National Firearms Committee with representation from each province and territory that would act as an advisory board to the federal government on firearms related matters. The committee must include representation from the firearms industry.

- The general public does not know that legal firearms owners do not commit crimes with firearms. Manitoba must provide a more evidence-based approach when detailing information regarding firearms related offences. The information should be publicly communicated and include the type of firearm, how the firearm was obtained, if the firearm legally owned, was the crime gang related, etc.
- Manitoba create a joint firearms committee between government, law-abiding gun owners, Indigenous groups, law enforcement, and firearms suppliers to exchange information related to firearms.
- Manitoba to push for tough sentences for criminals that use firearms in the commission of a crime.
- Manitoba promote and deliver education and safety programs related to firearms based on statistical evidence that are directed to where programs are most needed.

The Advisory Group appreciates the opportunity to provide input on this very important matter. Please inform the Advisory Group if you have any questions or comments.

Sincerely,

Manitoba Bill C21 Advisory Group Communications Coordinator
Rob Andrushuk, Manitoba Trappers Association

C. Manitoba Bill C21 Advisory Group

Dean Barteski, youth mentor and former farmer;

Grant Boryskavich, Reeve for the RM of Riding Mountain West;

Paul Conchatre, Manitoba Lodges and Outfitters Association;

Carty Deacon, Manitoba Wildlife Federation;

Darrel Deslauriers, Indigenous Peoples Alliance of Manitoba;

Matt Hipwell, President, Wolverine Supplies;

Archie McPherson, Reeve, RM of Pipestone;

Rick Wowchuk, Legislative Assistant to the Minister of ARD, Bill C21 Advisory Group
Lead