

The Honourable Marco Mendicino  
Minister of Public Safety  
Confederation Building, Suite 203  
House of Commons  
Ottawa ON K1A 0A6

April 14, 2022

Dear Minister Mendicino:

Please allow me to congratulate you on your appointment as minister of Public Safety. As Alberta's chief firearms officer, I appreciate our shared responsibility for the safety of Canadians and Albertans.

This is a time to review past directions in light of evolving circumstances and new information. As public servants, it is our responsibility to continually re-orient policies to ensure they meet Canadians' justifiably high expectations with respect to efficacy, fairness and value for the precious resources taxpayers have entrusted to us.

I therefore draw your attention urgently to one policy that clearly fails all three of these tests: Order-in-Council SOR/2020-96 of May 1, 2020, prohibiting over 1,500 types of firearms, including many historical artifacts and commonly used modern and traditional sporting firearms. A subsequent Order-in-Council, SOR/2020-97, initially established a two-year associated amnesty with an expiry of April 30, 2022, which has just recently been extended only to October 30, 2023. While the extension of the amnesty is welcome, a longer period of time is required to address a number of concerns with the impact of the federal government's plans on law-abiding Albertans. Therefore, I strongly urge you to consider adjusting the direction of the May 1, 2020 Order-in-Council and, at the very least, further extending the amnesty, as indicated below.

As Alberta's chief firearms officer, I am firmly committed to making data-driven decisions focused on public safety. It is alarming that no evidence has been adduced to justify the arbitrary selection of the firearms on the list. Prohibiting specific types of firearms is an approach that has proven ineffective in improving public safety. It is time to focus on what does work, the diligent pursuit and prosecution of criminals and those putting firearms into their hands. In Alberta, it is these scofflaws that are driving both rural crime and the alarming violence in our major cities. When properly administered, the Canadian Firearms Program already ensures careful screening of law-abiding firearms owners, regardless of the type of firearms they wish to acquire.

the Canadian Firearms Program already ensures careful screening of law-abiding firearms owners, regardless of the type of firearms they wish to acquire.

The federal policy measures contemplated for dealing with the firearms in question are also manifestly unfair. Requiring mandatory confiscation or deactivation represents an unacceptable intrusion into the personal lives of Albertans and other Canadians and a serious infringement on their property rights. Owners of the affected firearms acquired them in full conformity with the law at the time. They have not done anything wrong, yet they are to be forcibly deprived of their property or forced to effectively render it useless through compulsory deactivation.

Law-abiding participants in shooting sports, many of whom have invested substantial sums in their specialized equipment, including dedicated accessories and custom gunsmithing, have been devastated by the inability to pursue their passions as their property is frozen in place. Owners of historical artifacts covered by these requirements, for many of whom the items have significant sentimental as well as historical value, will be shaken to see their treasured property seized or desecrated through deactivation. It will be difficult enough to put a monetary value on the losses these owners will face, particularly those that are significantly customized or are especially rare. Even more important, however, will be the loss of confidence in our firearms control system and government in general, when a community is singled out by such unjust and undeserved actions. We should be acting to build confidence in our systems, not bringing them into disrepute.

The vast resources that will be required to implement these plans would have a much better return elsewhere if your goal is safer communities for everyone. Such alternative measures would include better identification, tracking and prosecution of firearms traffickers, providing effective deterrence to those who misuse firearms, offering alternatives to the destructive gang lifestyle, and addressing the drug addiction that is destroying so many young lives. Even if the costs of implementing the ban can be constrained to just \$2 billion, this sum alone could pay for some 12,000 person years of specialized law enforcement, regulatory and social services personnel. Surely, this would offer better value for the taxpayers' hard-earned dollar.

In view of the foregoing, effective immediately I call on you to cancel the Order in Council prohibitions of May 1, 2020 outright. You should instead consider introducing a package of measures involving targeted spending to improve tracking and prosecution of actual offenders rather than honest citizens. If this cannot be done at a national level, then provinces should be provided the option to opt out of the prohibitions and to spend

the money you have earmarked for compensating owners of the firearms you would have banned on more effective measures, as outlined above.

If you need time to consider the effectiveness of the measures I have proposed and to draft concrete alternatives at the very least, I further call on you to extend the amnesty for a minimum of 3 years and to immediately enter into dialog with provincially appointed CFOs to better understand the needs of all responsible, law abiding firearms owners in Canada. The short extension of the amnesty recently announced does not allow enough time to deal with the complex issues raised by your current proposals, including ensuring inclusion of all firearms arbitrarily prohibited by RCMP decisions based on the Order-in-Council.

Please rest assured that my team and I remain at your complete disposal to provide the technical support necessary to end this ineffective regulatory aberration. We will work with you tirelessly to ensure a strengthened firearms control regime and the highest possible levels of public safety. I look forward to hearing from you soon.

Sincerely,

*Original signed by:*

Mrs. Teri Jane Bryant, MBA, Ph.D.  
Alberta Chief Firearms Officer