

PolySeSouvient / PolyRemembers

Étudiants et diplômés de Polytechnique pour le contrôle des armes
Students and Graduates of Polytechnique for gun control

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Montreal, May 5, 2022

*[Sent to Members of Parliament]
[House of Commons]*

Re: Ensuring a complete and lasting assault weapon ban

[Mr./Ms.]

It is already happening.

The Liberal government's May 2020 assault weapon ban is already being circumvented by gun manufacturers, just like the prohibitions introduced in 1991 and 1995.



"Lockhart Tactical Raven 9 Semi Auto Pistol Caliber Carbine": approved by the RCMP in 2022 as a non-restricted firearm

Without a clear definition in the Criminal Code for "prohibited firearm" – one that includes ALL assault-style weapons – Canada will be stuck with what is essentially the same "wack-a-mole" approach that led to the proliferation of tens of thousands of assault weapons in private hands following the 1991 and 1995 bans, as described by this 2012 internal RCMP memo:

The absence of regularly updating the regulations has allowed firearms to enter the Canadian market as non-restricted firearms, but that would have been classified as either restricted or prohibited had they existed in 1995. This poses a risk to public safety by allowing firearms designed for military and para-military purposes to be easily available to the public.

Indeed, despite the [May 1st Orders in Council](#) that banned some 1,500 models of assault-style weapons (as well as many more deemed variants or covered by related criteria), gun manufacturers have already managed to foil the rules and introduce new assault-style weapons into the Canadian market including non-restricted versions.

For example, early this year the RCMP [granted](#) a non-restricted classification to the "Lockhart Tactical Raven semi-automatic carbine", a firearm that is [manufactured](#) in Canada and promoted with a 10-round Glock magazine.



Other examples of recently introduced made-in-Canada non-restricted assault-style weapons include the following:

[Sterling Arms R 18 Mk.2 \(2022\)](#) – non-restricted:



[Crusader 9 \(2021\)](#) – non-restricted:



[RS-Q2 Osprey \(2021\)](#) – non-restricted:



These are only four of an [array of similar weapons](#) that remain not only unaffected by the May 2020 prohibitions but also non-restricted, meaning they are not registered (outside Quebec), are subject to less stringent storage requirements and can be used for hunting. It is obvious from recent images like these that we do not have a ban on assault weapons in Canada:



High Capacity Magazines

The reason non-restricted guns like the [Raven 9](#) and [Crusader 9](#) can be promoted with 10-round Glock magazines despite the general rule limiting the number of rounds to five for long guns (mostly non-restricted) is because of one of [many loopholes](#) in the regulations prohibiting high-capacity magazines. One of these loopholes was introduced in 2011 under the Conservative government and essentially [says](#) that magazines (ex: Glock) that are not specifically designed for the guns in which they fit (ex: Raven 9 and Crusader 9) are simply exempted from the 5 limit!

Recent Progress and Promised Measures Are Inadequate

We are very grateful for the historical May 2020 prohibitions and continue to applaud the Trudeau government for this important step. We and many others are eagerly awaiting the launch of the promised

mandatory buyback program. (Although the election and the pandemic certainly delayed the latter’s rollout, it is worth mentioning that New Zealand carried out its prohibition and buyback program all within the [same year](#).)

That said, it is important to note that the IOCs and the buyback program will not be enough to deliver to Canadians a comprehensive and lasting ban on assault weapons. While he was Public Safety Minister, Bill Blair said he [intended to](#) address regulatory gaps that allow manufacturers to design new weapons that circumvent the assault weapon ban, by establishing “evergreen” changes to the firearms classification system. This is what [New Zealand](#) did in 2019, for example by including in the definition of “prohibited firearm” all semi-automatic centre-fire rifles. Unfortunately, we have yet to hear of a similar measure being considered by the current government.

We are therefore calling on members of Parliament to support amending the definition of “prohibited firearm” in the Criminal Code to include all current and future assault-style weapons.

We are also grateful for the Liberal promise to ban modifiable magazines, that is, those that are designed to hold 20, 30, even 50 rounds but are “pinned” to block more than 5 for long guns and 10 for handguns. However, [according to the RCMP](#), these pinned magazines are readily restorable to their full (and illegal) capacity, and that is exactly what several recent mass shooters [have done](#) before embarking on their killing sprees.

Once again, it is important to note that the promise ban on modifiable magazines, while extremely positive, will not be enough to ensure magazines are limited to 5/10 rounds. [Other loopholes](#) will continue to undermine these limits, like the ones → eliminating limits for magazines designed for rimfire ammunition (meaning you can currently buy a [drum with 110 rounds](#)), → eliminating limits for magazines for centrefire cartridges designed for a long gun that is not a semiautomatic rifle and → allowing 10-round magazines for long guns - as long as they are not specifically designed for the gun they are used in. The former loophole was [blamed](#) by the coroner investigating the 2006 Dawson school shooting for allowing the gunman to use 10-round magazines for his long gun (the Beretta CX4 Storm) which otherwise would have been limited to five rounds.

Consequently, we are asking members of Parliament to support the elimination of all exemptions and loopholes that undercut the 5/10 limits for magazines. Ideally, the limit would be five for all firearms. The law should also require a gun licence to purchase magazines, just as it does for ammunition.

The 2021 Liberal election promises as well as [recent media reports](#) are giving us hope that, [this time around](#), the government intends to propose solid and effective gun control measures. While we are looking forward to the tabling of a new bill, it would be a shame if the upcoming legislation would ensure continuous access to assault weapons and large-capacity magazines, and guarantee that the three decade-long political battle to ban assault weapons in Canada will never end.

We hope we can count on your support. In solidarity,

[Signatures removed for publication]

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