



PolySeSouvient
PolyRemembers



Montreal, April 29, 2024

The Honourable Dominic LeBlanc
Public Safety Minister
Government of Canada
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Ottawa, (Ontario) K1A 0P8
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Re: Regulations related to the Olympic exemption under the freeze on handgun purchases

Minister,

As you know, Bill C-21 introduces various new measures that call for new regulations, including the rules associated with the exemption from the freeze on new handgun transfers for those who train, compete or coach in an Olympic handgun shooting discipline and who “meet the prescribed criteria.” Regulations are also needed to determine what constitutes a “business” to which a handgun owner could transfer handguns.

Consistent with the Prime Minister’s [statement](#) to the effect that “fewer guns mean safer communities” and that “limiting the number of handguns is a critical part of our plan to protect Canadians from gun violence,” regulations related to handguns should aim both to prevent potential abuse of the Olympic exception and limit the expansion of the handgun market through commercial acquisitions by gun clubs.

Bill C-21 states that the exemption applies to those “training, competing or coaching in a (Olympic) handgun shooting discipline”. The legislation was improved at the Committee stage with the addition of “meets the prescribed criteria and annually provides a letter” from a shooting sports governing body to a province’s CFO indicating “that the handgun in question is necessary for training, competing or coaching in those disciplines”.

There needs to be **clear criteria for what constitutes qualification as an Olympic handgun shooting discipline competitor, prospect or coach, as anyone can claim to be interested in participating in being part of an Olympic team.** We need to protect against shooting federations who may want to exploit this exemption and rubberstamp such letters.

Definitions are needed as regard to **what types of handguns and how many purchases are exempted, as well as for how long these handguns can be possessed.** Indeed, it is important to prevent individuals from disingenuously using this program to gain access to handguns, in order to then keep them for life.

Regulations should also limit the type of handguns that would be eligible for training, as the pistols used in Olympic/Paralympic competitions are very specific. Allowing athletes to access other handgun models for training purposes is too permissive and could potentially sustain a market for the kind semi-automatic handguns that Canadians especially want to see banned.

C21 does not provide restrictions for businesses who want to purchase new handguns. In fact, individuals are given the option to transfers their handguns to a business. Regulations should therefore strictly define

what constitutes a “business” to which an owner could transfer their handguns and lay out the conditions of ownership that would apply to these businesses, including terms that govern the clientele’s ability to use these handguns on per use or other basis. Indeed, we fear gun clubs and ranges could amass limitless amounts of handguns, thereby sustaining and even sanctioning the expansion of handgun sports or combat shooting. [Regulations that set rules](#) for gun clubs and shooting ranges need to be examined to make sure we do not back into a pay-per-use or rental model that bypasses the intent of the handgun freeze.

We are recommending that the new regulations should:

- a) **Set criteria for trainers and coaches** by requiring several years of experience in training or coaching a handgun-shooting Olympic or Paralympic discipline in order to qualify for an exemption. Trainers and coaches can do their jobs without purchasing new handguns.
- b) **Set criteria for competitors by limiting the exemption to high-performance athletes that have been accepted in a national Olympic handgun shooting sport team.** Alternatively, the criteria could require evidence that an athlete has reached the “train to win” phase of the [Long-Term Athlete Development Framework](#) and is involved in regular and sustained training by certified Olympic professional, including a detailed schedule commensurate with other Olympic sports training like daily or weekly training.
- c) **Limit the exemption to who train under current competitive Olympic target shooting programs** governed by a provincial or national sport shooting governing body, excluding any “new” program developed after May 18, 2023, that purports to be oriented towards Olympic shooting. This would also prevent the expansion of the exemption should the Olympic expand its shooting disciplines to the likes of the International Practical Shooting Confederation (IPSC).
- d) **Training or competing under any of the other numerous shooting organizations in Canada should not qualify for an exemption**, even if they are affiliated with a provincial or national sport shooting governing body.
- e) **Limit the type of handgun that can be subject to an Olympic exemption to the specific models used in Olympic competitions.** The handguns used for training should be of the same type and specification that conforms to rules of the Olympic event. At the very least, the regulation should place a high burden of proof on the shooting sports governing body to justify the purchase of any other type of handgun, since once a specific type of handguns is authorized by one CFO, it opens the door for any other applicant in every province.
- f) **Limit the number of handguns linked to an exemption.** Owning more than one should require detailed justification to the CFO, with three being the maximum limit. Further to this, all such exemptions (including their number per owner) should be tracked.
- g) **Link the ownership of a handgun purchased under the Olympic exemption to the time period that its owner is actively engaged in Olympic training/competing, as demonstrated by the annual letter of certification to the CFO.** If someone was granted an exemption because they train or compete in the Olympics, they should have to surrender the handgun once the person retires from the sport. This measure would go a long way to prevent people from joining an Olympic program only for a period that is long enough to qualify for an exemption and purchase (and then quit while maintaining possession of the newly purchased handgun).
- h) **Place a limit on the number of handguns that a gun club or a gun range can own – for example 10 handguns for every 500 members.** Gun clubs should be prevented from becoming “handgun emporiums” where hundreds are stored to promote recreational handgun shooting by limiting their

number to a prescribed quantity and placing restrictions on rentals. A fixed number of handguns based on membership, for example not more than the number equivalent to 5% of paying members, could mitigate what we consider to be an inappropriate exemption.

- i) **Limit the transfer of handguns to businesses that conform to specific criteria: 1) gun clubs that include infrastructure adapted for Olympic disciplines and that currently have qualified Olympic coaches as members, and 2) gun stores that have a recorded history of selling handguns to police and military institutions.** There is no need to allow additional gun clubs and gun stores to purchase handguns. The goal is to reduce their numbers, which should also extend to reducing their appeal for sporting purposes. The business exemption should depend on the services they offered at the time of the regulations banning the same of handguns (October 21, 2022), that is, whether clubs included Olympic training or not, and whether stores sold handguns to police or military.

We thank you for considering these recommendations.

Sincerely,

[Signatures removed for publication]

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Cc:
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