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, January 22, 2026

The Honourable Gary Anandasangaree
Public Safety Minister
Government of Canada
269, Laurier Avenue West
Ottawa, (Ontario) K1A 0P8
gary.anand@parl.gc.ca

Re: Strengthening regulation to ensure a comprehensive ban on large-capacity magazines

Minister,

We hereby reiterate our long-standing recommendations to eliminate loopholes and exemptions related to magazines in the regulations prescribing certain firearms accessories.

Studies show that in active shooter situations semi-automatic rifles wound and kill twice as many people as those using weapons that don't self-load. Research also shows that attacks involving large-capacity magazines result in a much higher average death toll, with jurisdictions that allow these devices having twice as many mass shootings as those that ban them.

Parallel to your party's commitment to ban assault weapons in the last election (April 2025), the Carney-lead Liberal Party also promised, in answer to a question about loopholes related to magazines, to "**close gaps that put public safety at risk**", more specifically **to "prohibit the sale and transfer of magazines capable of holding more than the legally permitted number of rounds"**.

> A Mark Carney-led government will complete the previous Liberal government's work to strengthen Canada's gun laws and close gaps that put public safety at risk.
>
> Large capacity magazines that hold more than 5 rounds are already prohibited in Canada. It is already an offence under the Criminal Code to possess, sell, or import magazines that exceed the legal limit.
>
> We will require the permanent alteration of large capacity magazines, to ensure that they can never hold more than five rounds again and prohibit the sale and transfer of magazines capable of holding more than the legally permitted number of rounds.

This promise has been reiterated several times by the Liberal Party in the past. It's 2021 election platform promised to "**crack down on high-capacity magazines and require that long gun magazines capable of holding more than 5 rounds be permanently altered so that they can never hold more than 5 rounds**" and to "**ban the sale or transfer of magazines that could hold more than a legal number of bullets, regardless of how they were intended to be used by the manufacturer**." This was also reiterated in the (then) Public Safety Minister's mandate letter.

> **A re-elected Liberal government will:**
>
> - Toughen our laws on banned assault weapons by making it mandatory for owners to either sell the firearm back to the government for destruction and fair compensation or have it rendered fully and permanently inoperable at government expense.
> - Crack down on high-capacity magazines and require that long gun magazines capable of holding more than 5 rounds be permanently altered so that they can never hold more than 5 rounds
> - Ban the sale or transfer of magazines that could hold more than a legal number of bullets, regardless of how they were intended to be used by the manufacturer.

In addition, as part of its May 1, 2023, announcements regarding various gun control measures, the government officially stated that it intends to **"update regulations regarding large capacity magazines to require the permanent alteration of long-gun magazines so they can never hold more than five rounds and ban the sale or transfer of magazines capable of holding more than the legal number of bullets."**

> - Update regulations regarding large capacity magazines to:
>   - Require the permanent alteration of long-gun magazines so they can never hold more than five rounds; and
>   - Ban the sale or transfer of magazines capable of holding more than the legal number of bullets.

Former minister Dominic LeBlanc also testified on Bill C-21 in October 2023 before the Senate Standing Committee on National Security, stating that "to complete the measures against assault weapons," the government is "**strengthening regulations on large-capacity magazines to eliminate loopholes and exemptions that allow access to magazines of more than 5 or 10 cartridges, for long guns and handguns respectively**."

In its report on Bill C-21, the House of Commons Standing Committee on Public Safety and National Security underscored the testimony of police witnesses that explained how easy it is to restore an altered magazine to its full illegal capacity, that adding a rivet to an over-capacity magazine is "the current practice" to comply to the law and officers "often see … that this rivet is simply drilled out." The Vancouver Police witness as well as the RCMP has indicated support for a ban on these modifiable magazines as "it is very important for law enforcement." **The Committee recommended that the government "review the importation, domestic manufacturing, sale and possession of all firearms magazines that can be easily modified to hold more than the maximum permitted capacity."**

> Some witnesses explained that it is easy to restore an altered magazine to its full illegal capacity.[303] As described by Staff Sergeant Michael Rowe from the Vancouver Police Department:
>
> > The current practice to limit capacity on a magazine is that people will often insert a rivet in the back of the magazine that prevents the follower—the small piece that follows the rounds—from progressing lower and taking a higher capacity. Often we'll look for this rivet. You can often see on magazines where the capacity has been expanded that this rivet is simply drilled out. Therefore, it's not a permanent alteration. It's very easily defeated.[304]
>
> …
>
> Similarly, Staff Sergeant Michael Rowe from the Vancouver Police Department indicated that he would "certainly support the outright ban of high-capacity magazines" and stated that such a ban "is very important to law enforcement."[311] RCMP Commissioner Brenda Lucki informed the Committee that she was also in favour of such a ban.[312]
>
> Consequently, the Committee recommends:
>
> **Recommendation 26**
>
> **That the Government of Canada review the importation, domestic manufacturing, sale, and possession of all firearms magazines that can be easily modified to hold more than the maximum permitted capacity.**

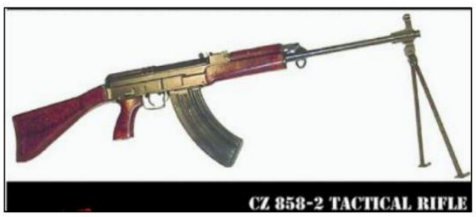
Banning modifiable magazines is long overdue, given the many mass shooters who legally bought them - only to remove the rivet to render them to their full illegal capacity:

Mass shooters who illegally modified their legal magazines

➡ **Justin Bourque used a legal semi-automatic M305 rifle to shoot three RCMP officers in Moncton in June 2014**. This weapon is a Chinese semiautomatic version of the American military's M14, a favorite of military weapons collectors. Bourque legally possessed this weapon as well as two magazines originally designed for 20 rounds and sold with a pin to hold no more than 5 cartridges, in keeping with Canadian law. That the pin was illegally removed by Bourque so that the magazines could hold 20 cartridges.



➡ **Richard Bain had in his possession ten legal CZ-858, one of which he used in the attack against Premier Pauline Marois in September 2012**. He used an illegally modified 30-round magazine. If the weapon had not jammed while trying to shoot a police officer, things would have turned out much worse (one person was killed, stagehand Denis Blanchette). According to an academic expert, the Czech CZ-858 is similar to the AK-47, with only a few differences: the CZ is more powerful but known to be less reliable.



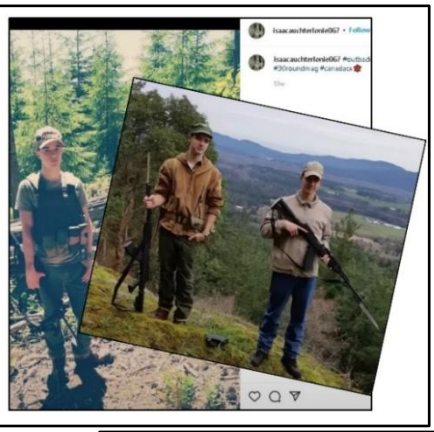
➡ **In January 2017 Alexandre Bissonnette had a Czech semi-automatic Small Arms VZ58 Sportster rifle.** He was equipped with two illegally modified 30-cartridge magazines containing 29 cartridges. He also had a Glock pistol and five 10-bullet magazines. According to the media reports, he legally owned at least six guns. By a stroke of luck, the VZ58 jammed on the first shot, preventing him from using it further. He subsequently used his handgun, virtually emptying all magazines (48 bullets) and, leaving behind six dead, five wounded and dozens of worshippers including children traumatized for life, left less than two minutes after he entered the Mosque.



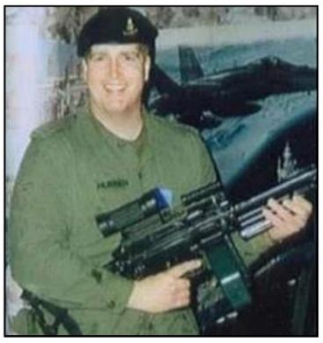
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➡ **In June 2022, brothers Mathew and Isaac Auchterlonie, both 22, set out to rob a Saanich bank with legal SKS semi-automatic rifles. According to the RCMP, their goal was to draw police into a gunfight in order to shoot as many officers as possible (several were injured).** The gun men illegally modified at least one magazine for it to hold 30 rounds.



➡ **In July 2020, Corey Hurren drove for 28 hours to get to Ottawa, rammed his truck through the gate at Rideau Hall, carried three loaded long guns, and set off in pursuit of the Prime Minister.** Amongst other charges, Hurren was charged with having a "prohibited high-capacity magazine" (likely for his – legally owned - M14). The prosecutor in this case stated that "Mr Hurren thought it might be useful to him to be able to fire 30 rounds without reloading."



However, in order to achieve a true ban on large-capacity magazines, the government needs to close all loopholes and exemptions in the current regulations, and this should also apply to handguns.

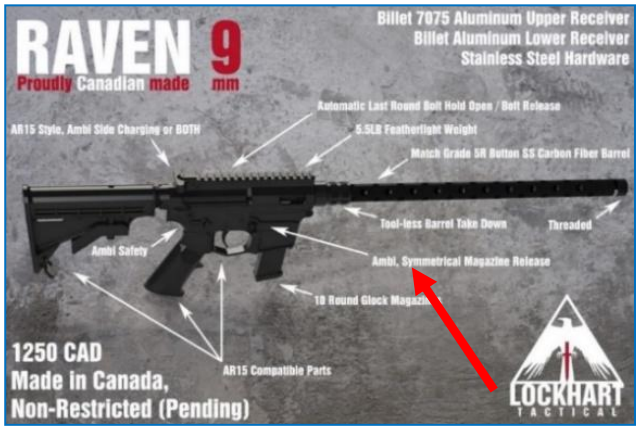
Here are our recommendations. These were previously submitted in a joint letter to former minister Marco Mendicino with Danforth Families for Safe Communities on May 29, 2023 and sent to former minister Dominic LeBlanc on April 17, 2024 by PolySeSouvient:

a) **Ban the sale of modifiable magazines and implement a "permanent conversion" schedule for those currently in circulation which includes a sunset clause of maximum three years.** Modifiable magazines are designed to hold 20, 30, 50, even 110 rounds but are "pinned" to block the insertion of more than 5 cartridges 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

Canadian mass shooters have done before embarking on their killing sprees. The Liberal Party has promised to require the permanent conversion of existing modifiable magazines and to prevent new ones from being sold. We recommend a specific phase out (for the permanent conversion) for current magazines, and we propose for it to run out in three years. The ban on sales of modifiable magazines and the phase-out of current ones should also apply to magazines used in restricted firearms (handguns).

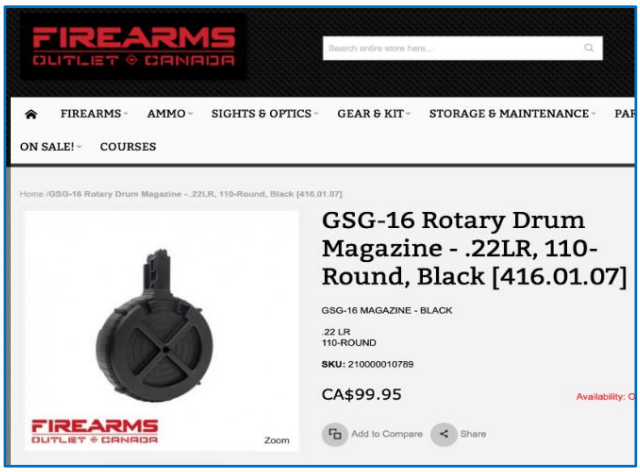
b) **Reverse the 2011 RCMP interpretation issued under the Conservative government which says that if a magazine is not purposely designed for a specific gun in which it fits, it's exempted from the 5/10 limits**. This loophole was blamed by the coroner investigating the 2006 Dawson school shooting for allowing the gunman to use 10-round magazines for his restricted long gun (the Beretta CX4 Storm) which otherwise would have been limited to five rounds. The same loophole allowed northern B.C. resident Cameron Rose's murderer to legally use a 10-round magazine for his Aero Survival Rifle, which is designed to use pistol, not long gun, magazines. Even the author of the regulations said this interpretation is absurd. The Liberal election promise may be referring to this loophole by aiming to ban the future sale of "magazines that could hold more than a legal number of bullets, regardless of how they were intended to be used by the manufacturer," although this is unclear. This loophole should also be eliminated for handgun magazines.

EXAMPLE: The "Lockhart Tactical Raven 9 semi-automatic carbine" is a recently introduced model manufactured in Canada that is one of many assault-style models that remain legal and non-restricted (it would have been banned under G-46). It is promoted with a 10-round Glock magazine. If the Raven 9 can be promoted with 10-round Glock magazines despite the general rule limiting the number of rounds to five for long guns, it's because the Glock magazines were not specifically designed for the Raven.



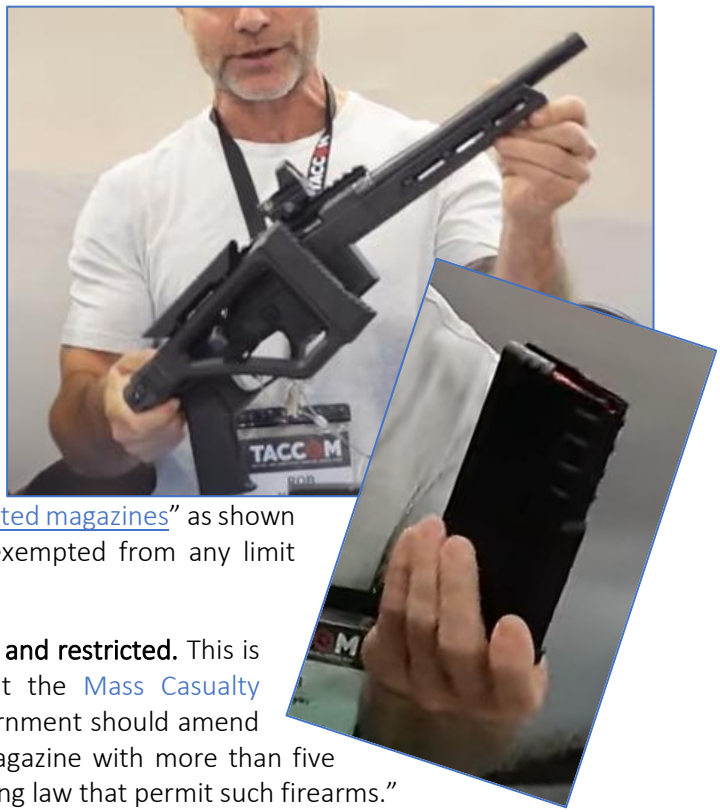
c) **Eliminate the exemption for magazines designed for rimfire ammunition, for which there are currently no limits.** This exemption is the reason why drums containing 110 rimfire cartridges are legal in Canada.

Rimfire ammunition refers to a type of metallic firearm cartridges, where a gun's firing pin strikes and crushes the base's rim to ignite the primer. The rimfire .22LR (Long Rifle) cartridge is by far the most common ammunition in the world today, but other rimfire ammunition exists. Magazines that were originally manufactured for use in a firearm that is designed to use rimfire cartridges are exempt, as long as they can't also be used in a semi-automatic handgun. However, if a magazine can be used in a semi-automatic handgun, then the limit automatically becomes 10 — and this applies even for a gun that is non-restricted. The RCMP has warned that though less powerful than other types of ammunition, the 10/22 cartridges are lethal and particularly dangerous when combined with a large-capacity magazine.



Magazines up to 110 shot capacity are available. Although the 22LR cartridge is less powerful than most, it is nonetheless lethal, and combined with high capacity magazines, presents a public safety hazard and an officer safety concern when responding to incidents involving these magazines.

d) **Eliminate the exemption for magazines holding centre-fire cartridges that are designed for a long gun that is not a semi-automatic rifle**. The current regulations state that "magazines designed to contain centre-fire cartridges … for use in a rifle other than a semi-automatic … rifle do not have a regulated capacity." That is why this Black Creek representative can showcase (2:13) the MRX Bronco FSS ("Folding Safety Stock"), a non-restricted firearm described as the "*shortest non-restricted gun available in Canada*" - essentially "*a backpack gun*". He states (3:53) it feeds from AR-15 magazines as well as proprietors' magazines, a "20-round non-restricted magazines" as shown in the video for "the perfect package". It's exempted from any limit because it's a bolt-action rifle.



e) **Cap all magazines at 5, for both non-restricted and restricted.** This is what most Canadians want as well as what the Mass Casualty Commission recommended: "The federal government should amend the Criminal Code to prohibit the use of a magazine with more than five rounds so as to close the loopholes in the existing law that permit such firearms."

f) **Prohibit devices and configurations that go against the spirit of the ban on large-capacity magazines, such as "cross mags",** i.e., two ten-round mags connected at the end that one can just flip and keep shooting, which are featured in this video showcasing Black Creek Labs' new non-restricted SRV2 Siberian semi-auto rifle that can be used with "10 cross mags". These cross mags are manufactured by Cross Industries and sold in Canada. Not only does each individual magazine benefit from the 2011 loophole as they are "pistol mags" not designed for long guns, but nothing prevents them from being physically combined to increase the speed of recharging the gun.



g) **Apply to prohibited accessories the same safeguard that prevents the downgrading of the classification of prohibited firearms through regulation.**

Former Bill C-71 included the repeal of subsections 117.15(3) and (4) of the Criminal Code (adopted under the Conservative government in 2015 via Bill C-42) which allowed the Governor in Council to override the firearms classification definitions in section 84 of the Criminal Code by way of regulations carving out exceptions, i.e., downgrade the classification of prohibited and restricted firearms as the

Conservatives did just days before the 2015 election with respect to the Swiss Arms family and the CZ858.

Subsections in 117.15 repealed:

"Non-restricted firearm

(3) Despite the definitions ***prohibited firearm*** and ***restricted firearm*** in subsection 84(1), a firearm that is prescribed to be a non-restricted firearm is deemed not to be a prohibited firearm or a restricted firearm.

Restricted firearm

(4) Despite the definition ***prohibited firearm*** in subsection 84(1), a firearm that is prescribed to be a restricted firearm is deemed not to be a prohibited firearm."

However, this provision had not come into force because it was tied to other measures in Bill C-71 and required a legislative amendment to do so. Bill C-21 included such an amendment (subsection 64(1) which separates out its coming into force from the other measures). The repeal of this authority came into force as C-21 received Royal Assent. This means that the Criminal Code has now returned to its pre-2015 mechanism of authorizing the government to prescribe a firearm "to be a prohibited firearm" by regulation under section 84(1), while NOT allowing the reversal or undoing of a prohibited classification (through regulations).

"PART III - Firearms and Other Weapons

Definitions

84 (1) In this Part […]

"***prohibited firearm*** means […]

(d) any firearm that is prescribed to be a prohibited firearm; […]

restricted firearm means

(b) a firearm that **(i)** is not a prohibited firearm […]

(d) a firearm of any other kind that is prescribed to be a restricted firearm;"

In other words, if a future government wants to downgrade the classification of firearms that are prohibited, it will have to do so through legislation, which requires majority votes in both the House and the Senate. This holds true for models that were prohibited through Orders in Council in May 2020, as this is specified in paragraph 84 (1) (d). This is an excellent outcome for public safety.

We recommend a legislative amendment to apply the same type of safeguard to prohibited accessories like large-capacity magazines.

We thank you for considering these recommendations.

Sincerely,

[Signature removed for publication]

Heidi Rathjen, Coordinator

Cc: Prime Minister
Minister of Justice
Parliamentary Secretary to the Minister of Public Safety
BQ Public Safety Critic and NDP Public Safety Critic