Good afternoon and thank you for taking the time to review this email.

As the non-profit organization that represents Canadian businesses that operate under the firearm and hunting umbrella (CSAAA), we are offering a report of our concerns and recommendations from industry experts. We need our voices heard.

Our main concern is the billion-dollar industry that many provisions of Bill C-21, especially a handgun freeze will damage. Handgun sales make up 30%-40%+ of business for most of our members and this bill will force many outdoors sporting, recreational clubs and airsoft companies to close and people to lose their jobs.

The components of Bill C-21 that concern our industry include the national handgun freeze, prohibiting replica airguns, magazine regulations, marking regulations and secure storage regulations.

There are approximately 64,000 citizens that make up the replica firearm community and a whopping 70% don't even own "real" firearms. Most aspects of Bill C-21 are very concerning, and so is the lack of clarification in the Bill. I believe that this sets businesses and individuals up for failure.

Hunting and firearm businesses alone contribute over \$5 billion dollars to Canada's GDP and support well over 45,000 jobs.

Our concerns and recommendations on the replica firearm portion are as follows:

How "replica" is defined could impact many different product categories. We intend to use existing practices and help you better define the bill language on replicas to maintain bill intent without completely eliminating the long-standing product categories in Canada and affecting lawful Canadian users, additionally, bringing an end to many Canadian businesses.

We believe after our discussion, perhaps the most logical and straightforward way to approach the replica portion is with modified requirement language within the bill. Our suggestion is as follows:

Replicas shooting 366-500fps that fire/shoot/discharge a non-metal projectile or even do not discharge any projectile: these replicas would require an orange tip, no shorter than 6mm (exposed) and be permanently attached.

This category would include but is not limited to:

- 1. Airsoft Guns
- 2. Gel/Water Ball Guns
- 3. Paintball Guns
- 4. Soft Dart-type guns

Replicas shooting 366-500fps that fire/shoot/discharge a metal BB or Pellet (Recreational shooting products): This one replica category would not require an orange tip or any additional coloration from current standards.

**NOTE:** These products could do significant bodily harm if a person were to be shot with them. Requirements to add orange tips or specific coloration on the product could give the impression to a potential user that the product is a "toy" or gaming product. At that point, the impression of the product being a toy could lead the user to shoot another person, unintentionally injuring them.

We realize that Public Safety would not want to create a new public safety issue that has not been an issue in Canada for 30 years by requiring this one product segment to be categorized the same as all the other replica product segments, therefore airsoft products have orange tips in the US, but metal BB and Pellet projectile products do not.

The industry completely supports the goal of increasing public safety, however, this Bill will not do so. Our group of industry experts and stakeholders invite you to ask any questions or for further clarification on any points that have been made or request more information on the tight restrictions, we already follow. We are also open for consultation.

Thank you for your time and we encourage questions and meetings to allow us to consult and discuss further,

## Jenn Gadbois

Managing Director | Registered Lobbyist Canadian Sporting Arms & Ammunition Association 1-705-875-2302 (voice or text) Schedule a Call csaaa.org

A donation to the cause goes a long way. <u>Click Here</u> to donate to CSAAA's initiatives. Help us fight for your hunting and firearm industry.

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