[Your Name or Club Name]

[Contact/address]

[Today’s date]

Policy and Security Branch

PO Box 9258 Stn. Prov. Gov.

Victoria, B.C. V8W 9J7

Attn: Cole Winegarden - Acting Director Legislation and Policing Programs

Dear Acting Director Winegarden,

Re: Letter of June 17/21 Requesting Feedback on B.C. Bill 4: Firearm Violence Prevention Act Ref: 620721

I welcome the chance to comment on the Firearm Violence Prevention Act.

[Your relevant background/the background of the shooting club you represent]

We members of the legal firearms community support legal mechanisms against those people who use firearms to break the law. However, Bill 4 will seriously jeopardise the survival of most small and medium-sized shooting ranges in B.C., resulting in negative environmental impacts of abandoned lead-contaminated ranges, degraded shooting skills of hunters and law enforcement officers (who often use the ranges), and loss of legal outdoor recreational options.

**Financial burden of B.C. Bill 4**

Bill 4 will cripple small and medium shooting clubs and will significantly increase the financial burden on larger shooting clubs by making verification of multiple pieces of ID mandatory when entering the ranges. Currently, most clubs have an unmanned locked gate (with keys issued to members) and few staff on site. This ID requirement would necessitate dedicated staff to inspect each person’s ID at the range entrance, adding an additional ~$150 000 a year in employee cost to operation, plus costs for infrastructure changes, plus record keeping and storage for up to 6 years and the associated administrative staff time. In addition, $5,000+ fines for volunteers and low-paid staff will deter people filling these positions. Such fines will deter the dedicated volunteer directors who keep ranges and clubs operating legally. Such financial demands go far beyond existing financial and legal requirements for ranges and are unaffordable for many if not most BC shooting clubs. **This financial burden will probably mean the closure of up to 150 shooting clubs in British Columbia.** Moreover, it is unclear how the government proposes to define “duty staff” when most staff are volunteers.

**Negative Environmental Impacts of B.C. Bill 4**

While some larger gun ranges could survive this substantial increase in operating costs from Bill 4, it is almost certain that up to 150 small and medium-sized ranges in B.C. will be forced to close, resulting in significant unintended negative consequences to the local environment and the Ministry of Environment. First, gun ranges contain significant quantities of lead from spent ammunition that accumulates pending recycling. The Ministry of Environment is currently developing a code of practise for such recycling that is consistent with current regulations. **If ranges are forced to close because of financial consequences of Bill 4, they will become abandoned sites that are contaminated with lead, which will in turn become a major challenge for the Ministry of Environment, burdening regulators with up to 150 small abandoned, contaminated sites as per the current regulations.** Ministry of Environment staff already have much more important issues to address than a government-created problem.

**Negative Effects of B.C. Bill 4 on Law Enforcement**

The forced closure of more than one hundred local ranges will also result in degraded shooting skills, which result in more wounding of hunted animals versus a clean harvest for Canadians who hunt for their meat. Hunters may be forced to use sub-optimal, unregulated locations to use firearms, e.g., hunters sighting in their guns and practicing in locations that are not intended for that purpose. This is a public safety risk and is something that the B.C. government has been trying to discourage for many years.

In addition, many law enforcement agencies conduct mandated firearms training on these local ranges. As ranges and clubs close, this will lead to the unintended consequence of law enforcement agencies (Municipal police, RCMP, Sherriff services, Conservation Officers, Federal Fisheries Officers, Park Wardens, private security firms such as Brinks) of not having locations for mandated training. Less routine practice under controlled circumstances will lead to degraded shooting skills, quite possibly resulting in degraded shooting skills of federal, provincial and municipal law enforcement officers.

**Negative Effects of B.C. Bill 4 for Minors**

Different types of legal identification might not be an issue for an adult recreational sports shooter but that is not the case for minors. We host many youth groups (Scouts, Guides, schools, and various Olympic shooting sports) as guests and have many Junior Members. Many of these younger ages do not have the type of government-issued ID Bill 4 requires. Section 27 (3) requires a non-member who does not possess a PAL to provide name, address, phone number and date of birth. Overall, the requirement to keep and store records raises concerns protection of personal information, privacy, and access. As most ranges and clubs are not-for-profits, they have limited funds and space to securely store the type of information that may be required.

Part 3 “Designated Property” raises separate concerns; members of our club regularly engage in hunting and firearms safety training with students at schools and in church-based meeting spaces. This includes Environmental Education, the BCWF CORE course (required to obtain a hunting licence) and the Canadian Firearms Safety Course. The training is often at the request of the school and such events are normally sanctioned by the teachers, parents, school board and the local RCMP detachment. This is a valuable pre-range day experience for the students to understand the principles of firearms safety. It makes the actual range day much easier to facilitate and increases the safety of the participants on range day as they have a clearer understanding of firearms use.

**On-the-ground Recommendations**

It is strongly recommended that the administrative burden of B.C. Bill 4 on legal gun owners be kept to a minimum cost. Clubs should only be required keep a sign-in register of members who attend on a given day. Identification should only be required when becoming a member or purchasing a day pass. An open register could be set up requiring the member’s name, membership number and guest names on signing in and out.

It is strongly recommended that minors should not be required to produce ID.

It is strongly recommended that only information that has concrete evidence of being useful to reduce violent crime be required to be collected and stored by clubs and ranges.

It is strongly recommended that government certified firearms instructors be granted an exemption for bringing disabled firearms and ammunition into various schools and places of worship with the permission of the school or church for the purpose of providing CORE, Canadian Firearms Safety Course, and related safety instruction.

It is strongly recommended that the government provide a draft of regulations to clubs to allow for substantive consultation, especially as government staff have minimal to zero experience in range operations. Club members need to see the regulations that are being referred to before we/they can fully meaningful and useful feedback.

Finally, it is strongly recommended that there be at least one year to implement the regulations after they have been developed.

We/I trust that you will read and strongly consider all of the above information provided.

Respectfully,

[Full Name]

[Title if relevant and/or Shooting Club Affiliation if relevant]