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COMMENTARY: WHAT U.N. FIREARM MARKING MEANS FOR *YOU*, THE CANADIAN FIREARM OWNER



** This is Part 1 in our series on the UN Marking Scheme and what it means for Canadian gun owners.*

The Firearm Marking Regulations, introduced on December 23, 2004, have been postponed for 11 consecutive years by 3 separate governments for one simple reason: No government wanted to be responsible for killing Canada's legitimate civilian firearm industry.

Until now.

On June 1, 2017 – just ten short months from now – the shoe drops.

For most of us, the United Nations Firearm Marking scheme is an esoteric set of rules that really have little meaning for regular Canadian gun owners. The common refrain we hear is this: "So

what if the gun has an extra marking on it. That doesn't mean anything to me."

If you don't care about paying an extra couple of hundred dollars for every single gun you purchase, then you are absolutely correct. The UN Firearm Marking scheme means nothing to you.

However, most Canadians are not so eager to fork over an extra \$200 on each new firearm they purchase. Under the UN Marking scheme, an inexpensive firearm that is worth \$150 today would, because of UN Marking, become a \$350 firearm after June 1, 2017.

That's utterly insane and that's why this issue is so important.

How can a small mark added to a gun possibly cost so much? To understand why the costs are so high it is necessary to examine Canada's Bill C-10 Regulations on Firearm Marking.

First, Canada's Bill C-10 Regulations state precisely how the marking must be applied to a firearm:

4. (1) *The firearm shall be marked by permanently stamping or engraving on the firearm's frame or receiver the word "Canada" or the letters "CA" and*

(a) in the case of a manufactured firearm, the name of the manufacturer and the firearm's serial number; and
(b) in the case of an imported firearm, the last two digits of the year of the importation.

(2) The markings shall

(a) be legible;

(b) have a depth of at least 0.076 mm and a height of at least 1.58 mm; and

(c) subject to subsection (3), be visible without the need to disassemble the firearm.

In short, this means every single firearm imported into Canada must have "Canada" or "CA", a serial number, the manufacturer's

name (on the receiver) and a two-digit code for the year it was imported.

No big deal, right?

Canada imports roughly 350,000 firearms every year. If these regulations come into force on July 1, 2017 as scheduled, every single firearm imported must have this information engraved on its receiver in plain view.

Firearms are made from many things: different grades of steel, aluminum, titanium, alloys, brass, case hardening, plated metals and polymer frames/receivers. The only practical method for applying the country code and year of import to firearms is Computer Numerically Controlled (CNC) Laser Engraving. It is the only method that can cope with such a wide variety of materials effectively.

Each CNC laser-engraving unit costs nearly \$100,000. The fixtures to hold firearms in the CNC machine during engraving cost another \$3,000 or so FOR EVERY MODEL OF FIREARM imported.

You cannot use the fixture for a Beretta 92 handgun for a Sig Sauer P-226. Nor can you use the fixture for a Mossberg 12 gauge shotgun on a Ruger 10/22 rifle. Every make and model of firearm requires a laser engraving fixture specifically for that make and model at a cost of roughly \$3,000 a piece. Imagine just 100 different makes and models of firearms. That's \$300,000 for a single fixture for each of those firearms.

It gets worse.

These astronomical costs must be duplicated for every single firearm importer and firearm manufacturer in Canada. Every single penny of those costs are passed on to consumers in the form of higher firearm prices – higher by an estimated \$200 per firearm.

Why can't the manufacturers apply the marking when the firearm is manufactured? Because Canada's Bill C-10 Regulations state precisely when those markings must be applied:

3. (1) Every individual, business or public service agency that imports a firearm shall ensure that the firearm is marked in accordance with section 4 before the 60th day after its release as defined in subsection 2(1) of the Customs Act or before transferring the firearm, whichever occurs first.

Further to this point is the spirit of the C-10A legislation. The UN Marking is intended to be an import mark, not an export mark. If the manufacturer marks the firearm with the UN-correct marking, it only serves to identify that the manufacturer intends to ship the firearm to Canada, not that the firearm has actually been imported to Canada.

Firearms cannot be marked at the point of manufacture. Firearms can only be marked AFTER they are released from Canadian Border Services Agency (CBSA) and they must be marked within 60 days of their release from CBSA. There are many valid reasons for this, but for Canadian gun owners it cannot be done at the cheapest point in the manufacturing process, at the gun manufacturer's facility. It must be done in a Canadian facility that, at this time, does not exist.

Those facilities must be built, inspected and set up for firearm marking. Let that sink in for a moment. Those facilities do not exist in Canada. They must be created from scratch and that is very expensive.

Do you want to guess who will be paying for it?

The Firearm Marking regulations will come into force on June 1, 2017, unless the Trudeau government can be convinced that the regulations are not in the best interests of Canadians.

Our partner organization, the Canadian Sporting Arms and Ammunition Association (CSAAA), the firearm industry group that lobbies on behalf of hunting and shooting related businesses in Canada, estimates the total cost to apply the UN Marking to a firearm is just over \$200 per firearm.

This estimated cost includes CNC Laser Engraving machines, training and salary of the technicians required to run those machines, the new facilities that must be built or leased to house all of this, along with the labour to unpack and repack firearms from their factory packaging once the process is complete. It also includes the labour and computer systems required to track all of this activity so it can be reported to the United Nations.

The CSAAA estimates the cost of processing all firearms imported into Canada at about \$60 million per year. This does not include the cost of purchasing the equipment and training the people necessary. This is the cost PER YEAR after all the marking equipment is purchased, configured, the staff trained and the site is operational.

Can Canada's firearm industry really withstand a 60 million dollar tax PER YEAR? It's highly unlikely.

Firearm manufacturers, importers and distributors simply do not have the profit margins to allow them to absorb these astronomical additional costs. Every penny of this cost must be passed on to consumers: Canada's firearm owners.

Marking every firearm that enters Canada is no small task physically or financially. It is, however, an excellent way to radically limit the importation of firearms without actually banning firearms from civilian ownership.

If you disagree with Canada's looming implementation of the UN Firearm Marking Regulations, please write to the following people and express politely why you believe implementing these regulations is a very bad idea for Canada.

- The [Rt. Hon. Justin Trudeau](#), Prime Minister of Canada
- The [Hon. Ralph Goodale](#), Minister of Public Safety
- [Michel Picard MP](#), Parliamentary Secretary to The Minister of Public Safety
- [Bob Zimmer MP](#), Co-Chair of the Parliamentary Outdoor Caucus
- [Yvonne Jones MP](#), Co-Chair of the Parliamentary Outdoor Caucus
- Your own federal Member of Parliament

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COMMENTARY: CANADA ALREADY MEETS THE REQUIREMENTS OF THE UN MARKING SCHEME



** This is Part 2 in our series on the UN Marking Scheme and what it means for Canadian gun owners*

The Firearm Marking Regulations, introduced on December 23, 2004, have been postponed for 11 consecutive years by 3 separate governments for one simple reason. No government wanted to be responsible for killing Canada's legitimate civilian firearm industry.

Until now.

On June 1, 2017 - ten short months from now - the shoe drops.

The Trudeau government seems to have great faith in all things United Nations, but unfortunately they seem to be unwilling to examine all of the facts when it comes to the UN's Firearm Marking Scheme.

Canada's already strict firearm import process accomplishes every goal specified in United Nations Protocol 55/255, formally called the *Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition*,

supplementing the United Nations Convention against Transnational Organized Crime.

That protocol, under Article 8, specifies the rationale for marking all firearms.

1. For the purpose of identifying and tracing each firearm, States Parties shall:

(a) At the time of manufacture of each firearm, either require unique marking providing the name of the manufacturer, the country or place of manufacture and the serial number, or maintain any alternative unique user-friendly marking with simple geometric symbols in combination with a numeric and/or alphanumeric code, permitting ready identification by all States of the country of manufacture;

(b) Require appropriate simple marking on each imported firearm, permitting identification of the country of import and, where possible, the year of import and enabling the competent authorities of that country to trace the firearm, and a unique marking, if the firearm does not bear such a marking. The requirements of this subparagraph need not be applied to temporary imports of firearms for verifiable lawful purposes;

(c) Ensure, at the time of transfer of a firearm from government stocks to permanent civilian use, the appropriate unique marking permitting identification by all States Parties of the transferring country.

The goal of the UN Firearm Marking protocol is to ensure every firearm can be tracked back to its point of origin. The protocol does not specify how that marking is to be accomplished, preferring to leave the entire implementation process up to individual party states.

Canada's implementation of this protocol is spelled out in the regulations of Bill C-10A, Marking of Imported Firearms. These regulations, passed on December 23, 2004, were postponed every year since then by three separate governments. They will finally come into force on June 1, 2017, unless the Trudeau government can be persuaded that doing so is a needless duplication of already existing Canadian import procedures.

All firearms imported into Canada already contain a *"unique marking providing the name of the manufacturer, the country or place of manufacture and the serial number"*.

All firearms imported into Canada already contain *"appropriate simple marking on each imported firearm, permitting identification of the country of import and, where possible, the year of import and enabling the competent authorities of that country to trace the firearm."*

Research into current practices reveals that virtually all firearms imported into Canada already meet the requirements of Article 8 of the *Protocol against the Illicit Manufacturing of and Trafficking in Firearms*.

The "make" of a firearm easily permits the identification of the "manufacturer" and the "country of manufacture" as required by Article 8. For example, a firearm with the "make" of "Browning" can easily be identified as being manufactured by Miroku in Japan.

Each firearm contains a serial number that is "unique" to that make and model of firearm. That serial number also identifies the year of manufacture. Commercial firearm manufacturer's records are so meticulously detailed that the make, model and serial number of a specific firearm will reveal when and where the firearm was manufactured, when it was shipped and to which country, when the firearm was released from Canada Border Services Agency (CBSA) and the name and address of the company who imported the firearm.

All of the information required by the UN Firearms Marking Protocol is ALREADY available quickly and easily using the existing firearm markings and the systems in place to track their movement from point of manufacture to their final destination at one of Canada's firearm importers.

Duplicating this process adds exorbitant costs to every single firearm imported into Canada for no discernible benefit. The only possible exception would be if the "benefit" is one not stated by the United Nations, namely; the removal of firearms from civilian hands.

If that is the ultimate goal of the Firearms Marking Regulations, then it likely will be somewhat effective. Adding over \$200 to the price of every single firearm sold in Canada will have a devastating effect on the sale of firearms in Canada.

Canada's firearm market is less than 3% of the world firearm market. Our few remaining firearm manufacturers and our firearm importers cannot withstand hundreds of millions of dollars in startup costs to implement these needless regulations. Our existing firearm businesses most certainly cannot withstand an additional cost of \$60 million per year to mark the 350,000 firearms imported every year.

Should the Trudeau government implement these regulations, it is debatable how long we will have a retail firearm industry in Canada. Sure, we may be able to purchase ammunition still, but that is small comfort if we cannot purchase the firearms to use it?

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The [Hon. Ralph Goodale](#), Minister of Public Safety
[Michel Picard MP](#), Parliamentary Secretary to the Minister of Public Safety
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Your own federal Member of Parliament

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COMMENTARY: Canada's Domestic Firearm Industry and UN Firearm Marking – Can the Former Survive the Latter?



This is Part 3 in our series on the UN Marking Scheme and what it means for Canadian gun owners.

Will Canada's domestic firearms industry survive the implantation of the UN Marking Scheme?

The short answer? Maybe, but it will be significantly changed.

Our domestic firearm industry is not large enough, nor is it profitable enough, to absorb the huge start-up and annual

expense for marking firearms. Nor will consumers be willing to foot that tab in the form of higher firearm and ammunition costs.

The long answer is contained in the rest of this article. Let's begin.

Canada imports approximately 650,000 firearms (including airguns) per year.

A time and cost analysis conducted by a major Canadian firearm importer revealed its best time to mark a firearm, including setting it up in the machine and returning it to its factory packaging, was approximately 20 minutes. That means a single Computer Numerically Controlled (CNC) operator with two assistants could successfully mark 24 firearms per day (3 per hour x 8 hour work shift) with a single laser engraver.

Simple math says the number of man-days required to process 650,000 firearms at the rate of 24 per work day is 27,083 man-days. There are 248 work days per year allowing for statutory holidays. That means Canadian firearm importers would require 109 highly trained technicians (with 218 assistants) working on CNC marking machines every single work day of the year to process the firearms imported into Canada in a single year.

The cost of those technicians, using a base rate of \$28 per hour (not including benefits) and minimum wage for the assistants (\$10.70/hr) would yield a total salary cost per year (not including benefits) of \$10,703,201.60.

Each technician must have their own Computer Numerically Controlled (CNC) Laser Engraving machine at a startup cost of about \$75,000 for the laser engraving machine. That's almost \$8.2 million just for the CNC Laser Engraving machines.

Every firearm must have a set of fixtures to hold every individual make and model of firearm that importer handles. Every single make and model of firearm requires laser engraving fixture specifically for that make and model at a cost of roughly \$3,000 each. You cannot use the fixture of a Beretta 92 handgun for a Sig Sauer P-226. Nor can you use the fixture for a Mossberg 12-gauge shotgun on a Ruger 10/22 rifle. For ease of figuring, let's say there are only 100 different firearms imported into Canada annually. There are A LOT more than that, but this will keep the math simple.

Each of the 109 laser engraving technicians requires 3 sets of each fixture for each firearm. That's \$32.7 million dollars alone for the fixtures to hold just 100 firearms in each of the engraving machines.

Admittedly, some importers will need less fixtures, but others may need more. Since firearm importers do not have machine shops where these machines can be set up, they must either build or lease a suitable building to house the firearm marking portion of their business. Warehouse space rents for roughly \$4-5 per square foot, so a warehouse space of 300' x 100' would cost a minimum of \$120,000 per year to lease.

Those spaces must be alarmed and be guarded around the clock seven days a week. Those costs will surely be respectable.

Every single firearm importer in Canada must build or lease a space, populate it with CNC Laser Engraving machines and capable staff and guard it around the clock.

Every. Single. Importer. Every single importer will bear these costs. Overnight, the smaller firearm importers may close up shop or become re-sellers of very expensive used firearms. The cost of implementation is simply too high. The larger importers, if they can see a business case for the massive expenditure and a path to recouping those costs from everyday Canadians, may move forward. But only if they can see a path to sustainability that allows them to remain profitable.

It's not hard to see why the costs are so astronomical to implement the UN's Firearm Marking scheme.

The figures here cover only the basics of what is required to implement the UN Marking Scheme and are by no means complete. Yet just this short list of expenses, with the \$40.9 million start up costs being amortized into the totals, and an annual total over \$10.8 million to engrave 650,000 firearms annually are staggering. Add in all the other costs not mentioned here, such as heat, lights, power, administration, computer systems and software, etc., and it's not hard to comprehend why the Canadian Sporting Arms and Ammunition Association (CSAAA) – the firearm industry group that lobbies on behalf of hunting and shooting in Canada – estimates the total cost to apply "CA 17" to a firearm could reach into the hundreds of dollars per firearm.

Is this massive expense worth it when the systems in place in Canada and at firearm manufacturers TODAY

already allow us to track a firearm from place and date of manufacture, to the date of arrival at Canada Border Services Agency (CBSA) for import into Canada, to the final Canadian firearm distributor?

Absolutely not.

Can Canada's firearm industry survive these enormous costs applied to every firearm imported into the country?

Sadly, it is very unlikely.

In short order, the number of Canadian firearm importers may dwindle to single digits where only the largest importer could stand a chance of surviving such a massive tax – all to duplicate existing systems that track firearms imported into Canada.

But if you can't ban guns, the next best thing to do is to collapse the industries that import them, right?

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- Public Safety Minister Ralph Goodale
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