



# CILA Institute for Legislative Action

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## C-17

### Summary

Our concern with Bill C-17 pertains to the “Amendments to the Explosives Act”, its impact on the handloading and reloading of sporting ammunition and the attendant effects upon Canada’s recreational shooters. This document addresses some of these concerns.

Clearly, the items described as “inexplosive ammunition components” bear no threat, real or potential, to Canadians, law enforcement or domestic security. These items are small, harmless pieces of commonly available metals or plastics and are non-explosive, non-flammable, non-toxic, and totally inoffensive. Some of them have other common uses and would be non-regulated for those uses, such as the use of lead shot for fishing sinkers, boat ballast and aircraft and racing car trim materials. Thus the regulation of their use as ammunition components would be “paper only” as they would still be available unregulated for these other purposes.

Other components such as brass cartridge casings have been commonly available in huge bulk lots from police and military services for years as scrap and as such, enormous quantities of them remain in circulation without any potential for harm.

### Background

Canada’s sport shooters discharge literally millions of rounds of ammunition annually and hundreds of thousands of Canadians load their own ammunition. The reasons are twofold: Cost and Precision.

Commercially made ammunition is relatively expensive and some shooting disciplines, such as trap, skeet and most pistol disciplines require enormous amounts of ammunition to achieve competitive proficiency. It is quite common for shooters in these sports to fire over one thousand rounds per week. Reloading the expended casings typically saves 30% - 50% in cost, much more in the case of certain pistol ammunition, which can sometimes save 90%. Many shooters, particularly pistol and muzzleloaders, cast their own lead bullets from melted down wheel weights for even more savings. Clearly, to be competitive, a sport shooter must reload their own ammunition otherwise cost will dictate proficiency.

Canada, unlike many other countries, does not provide ammunition for practice and competition to our Olympic, Commonwealth and Provincial teams. Shooters must bear the brunt of ammunition costs themselves and without the ability to reload their own ammunition, our international competitiveness will be lost.

The second aspect is the handloading of ammunition for precision. The companies that produce ammunition load millions of rounds per week and must be manufactured with tolerances that fit every firearm. As all firearms are somewhat unique in chamber and barrel dimensions, this ammunition is by necessity, a less than perfect fit for most individual guns. This lack of fit translates to a loss in inherent accuracy.

All precision shooters handload their own ammunition. The ability to precisely tailor ammunition to a specific firearm can make a radical difference in the accuracy of that particular gun and in most competitive rifle and handgun sports, target differences of .01” are the differences between win and loss.

Certain hunting disciplines rely solely on handloaded ammunition too, both for the reasons outlined above and for one other important element – safety. Varmint hunting, by necessity, is carried out on farms and varmint hunters specifically tailor their ammunition to be frangible, thereby eliminating ricochets and exit holes in valuable pelts.

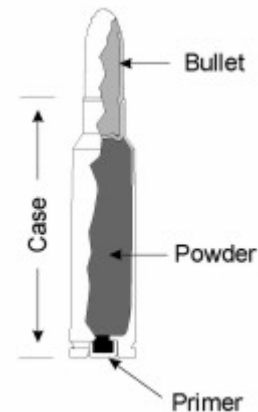
## Parts of a Metallic Cartridge

\* The Case: The case is simply a cylinder made of drawn brass. It forms the basis of the cartridge and all other components insert into it. The case is totally inert by itself.

\* The Bullet: The Bullet is the projectile that exits the firearms muzzle upon firing. It is usually made of lead wrapped in gilding metal (a combination of copper and nickel) although some bullets are also made of copper and / or plastics.

\* The Propellant: The Propellant (often wrongly referred to as "gunpowder" is the chemical formulation that, upon burning, imparts its energy to the bullet. It is wrongly categorized in Canada as an explosive (under the Explosives Act) although it is not. Rather than detonate as true explosives do, it progressively burns. It has absolutely no explosive qualities unless strongly confined under pressure and is much less volatile than many common household items, like aerosol cans and gasoline.

\* The Primer: The Primer is a small metal cup containing lead styphnate and is the only part of the cartridge that possesses any explosive qualities. They are regulated under the "Explosives Act". It serves to ignite the Propellant when struck by the firearm's firing pin. Primers are packaged in packs of 100, each primer individually separated to eliminate the possibility of a "chain firing".



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## Parts of a Shotshell

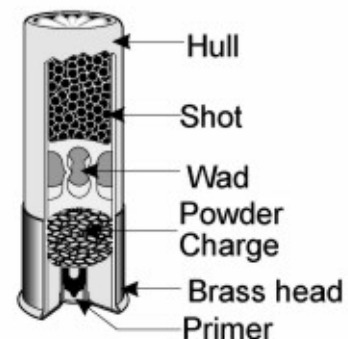
\* The Hull: The Hull is simply a cylinder usually made of plastic or paper. It forms the basis of the cartridge and all other components insert into it. The case is totally inert by itself.

\* The Shot: Shot are the projectiles that exit the firearms muzzle upon firing. They are usually made of lead although some shot is made of Bismuth, Steel or Tungsten.

\* The Wad: The Wad is simply a small plastic cup or piece of felt used to hold the Shot

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## C-17

C-17 seeks to enable regulation of “inexplosive ammunition components”. Specifically, these are defined as “any cartridge case or bullet, or any projectile that is used in a firearm as defined in 40 section 2 of the Criminal Code” and would include all casings, bullets, shot, wads or plastic sabots.

None of these items are explosive in any way and most are neither flammable nor toxic. As inert pieces of metal or plastic, these items have long been held to be outside the purview of the Explosives Act and have been completely non-regulated.

C-17 seeks to regulate the manufacture, possession of, sale, transport and delivery of these items and provides criminal penalties for same.

The use of these items amongst law abiding Canadians is common and has never presented a threat to the general public. This Bill does not examine the many possibilities of lawful usage of these materials nor does it address the harmless nature of the components themselves.

*Example: A person casting shot for their own personal use could find themselves afoul of the law for manufacturing “inexplosive ammunition components” without a manufacturing license yet the same person casting the same shot for the purposes of making fishing sinkers would not.*

*Example: A local police agency offers their expended brass for sale to a local shooting club or a scrap metal dealer. Are they illicitly trafficking in “inexplosive ammunition components” ?*

*Example: An individual is hunting and ejects an empty cartridge casing in the woods where others could easily find it. Did this person commit a criminal offense or did the other person commit an offense by picking up the case and putting it in his pocket?*

*Example: A local shooting enthusiast casts bullets and shot for their own personal use and subsidizes the cost by selling raw lead bullets and shot to others at the local shooting club. Is that person committing several offenses?*

The Explosives Act has long regulated primer and propellants because the potential exists (however small) for the misuse or mishandling of these items. There is literally NO POTENTIAL for the misuse or mishandling of the non-explosive, non-flammable parts of a safety cartridge. Inexplosive Ammunition Components are harmless pieces of common metals and plastics with absolutely no potential harm in and of themselves.

The possibility for misuse by loading these components into ammunition is farcical and that can be empirically proven. The handloading of ammunition is time consuming and painstaking and is done for the reasons outlined above. The handloading of ammunition is strictly the domain of the sport-shooting enthusiast and these “inexplosive ammunition components” have no use or value to the criminal or terrorist. Criminals and terrorists have never manufactured their own ammunition and it is hardly necessary for them to do so when ammunition can be simply purchased at department stores, from foreign governments or on the “black market”.

Clearly, the regulation of these components is directed at sport shooters despite an impeccable track record of non-abuse. This section of C-17 will have absolutely no purpose other than to further harass a law abiding

**21. (1) Except as authorized by or under this Act, every person who, personally or by an agent acquires, is in possession of, sells or offers for sale, transports or delivers any illicitly trafficked inexplosive ammunition component is guilty of an offense and is liable:**

**(A) on summary conviction, to a fine not exceeding two hundred and fifty thousand dollars or to imprisonment for a term not exceeding two years or to both; or**

**(B) on proceedings by way of indictment, to a fine not exceeding five hundred thousand dollars or to imprisonment for a term not exceeding five years or to both.**

segment of Canadians that use firearms for sporting purposes, further cripple retailer and importer sales and bear absolutely no benefit to the people of Canada

Our association views this section of Bill C-17 as yet another affront to our lawful, recreational use of firearms and respectfully requests its removal from the Bill.