



Our File Number: LEX-500255547

July 23, 2026

SUPREME COURT OF CANADA

Registry Branch, Room 156
301 Wellington Street
Ottawa, ON K1A 0J1

Dear Registrar:

**Re: SCC 41858 - *Christine Generoux et al. v Attorney General of Canada*
SCC 41859 - *Canadian Coalition for Firearm Rights et al. v Attorney General of Canada*
SCC 41860 - *Michael John Doherty et al. v Attorney General of Canada*
SCC 41861 - *Jennifer Eichenberg et al. v Attorney General of Canada***

The Attorney General of Canada responds to the intervention motions from the following: British Columbia Civil Liberties Association; Canada's National Firearms Association; Canadian Constitution Foundation; Canadian Shooting Sports Association; Canadian Taxpayers Federation; Coalition for Gun Control; International Practical Shooting Confederation Canada; Ontario Rifle Association; and Safari Club International.

The Attorney General of Canada does not oppose the above-listed motions for leave to intervene, but notes the following:

- Canada's National Firearms Association expresses support for the Appellants¹ whereas that is not the purpose of an intervener.²
- The Canadian Constitution Foundation applied to the Federal Court of Appeal (FCA) for leave to intervene and was denied due to lateness and because "the Court fails to see how CCF's proposed intervention will assist the determination of the issue."³ There are similarities between their proposed submissions and what they advanced before the FCA.
- The Canadian Shooting Sports Association's perspective is already in the record on the appeals as their Executive Director was an affiant in the courts below.⁴ Their proposed submissions also appear to duplicate the Appellants' submissions.
- The Canadian Taxpayers Federation applied to the Federal Court for leave to intervene and was denied. In denying intervener status, the court noted that "[f]iscal considerations are

¹ Memorandum of Argument at para 3.

² [Notice to the Profession - Interventions \(November 2021\)](#) at point 2.

³ Federal Court of Appeal order dated July 23, 2024 [A-327-23, A-324-23, A-325-23, A-326-23].

⁴ Affidavit of Anthony Bernardo, sworn September 14, 2020 [Appeal Record, Vol. 4, Tab 5E.x].

not relevant to the assessment of whether the [Order in Council] is *intra* or *ultra vires*” and the matters before the court are “not concerned with the question as to whether the measure is a good use of public funds.”⁵ The Canadian Taxpayers Federation’s proposed submissions in the present appeals also address the Assault-Style Firearms Compensation Program,⁶ which is not in evidence or at issue in the appeals.

- International Practical Shooting Confederation’s perspective is already in the record as their Québec President and Ontario Vice President were affiants in the courts below.⁷
- The Ontario Rifle Association appears to intend to rely on evidence not in the record on the appeals.⁸
- Safari Club Canada appears to intend to rely on evidence not in the record on the appeals.⁹

With respect to the Coalition for Gun Control, given the number of firearms organizations seeking to intervene, an intervention by a civil society gun control organization may assist in maintaining a balance in the arguments before the Court.¹⁰

The Attorney General of Canada submits that interventions should be on the following terms:

1. The proposed interveners are not entitled to raise new issues, adduce further evidence, or otherwise supplement the record of the parties;
2. The proposed interveners are responsible for their own costs on the appeal;
3. The proposed interveners may serve and file a factum not to exceed 10 pages in length;
4. The proposed interveners may make oral submissions of not more than 5 minutes in length; and
5. The appellants and respondent may each serve and file a single factum not to exceed 5 pages in length in reply to all non as-of-right interveners.

Yours truly,



Zoe Oxaal

Senior General Counsel

⁵ [*Parker v Canada \(Attorney General\)*, 2022 FC 1279](#) at para 11.

⁶ Memorandum of Argument at paras 2, 10, 13, 16, 21.

⁷ Affidavits of David Huta and Franco Nardi, sworn September 28, 2021 and September 30, 2021, respectively [Appeal Record, Vol. 3, Tabs 5D.i and 5D.iv].

⁸ Memorandum of Argument at paras 11-14, 21-49.

⁹ Memorandum of Argument at paras 4, 12-16.

¹⁰ [Notice to the Profession – Interventions \(November 2021\)](#) at point 5.

Proposed Interveners:

British Columbia Civil Liberties Association
Canada's National Firearms Association
Canadian Constitution Foundation
Canadian Shooting Sports Association
Canadian Taxpayers Federation
Coalition for Gun Control
International Practical Shooting Confederation Canada
Ontario Rifle Association
Safari Club International

COPIES TO:**Marie-France Major**, agent for:

Christine Generoux;
John Perocchio and Vincent Perrochio;
Canadian Coalition for Firearm Rights;
Rodney Giltaca, Ryan Steacy, Maccabee Defense Inc. and Wolverine Supplies Ltd.;
Michael John Doherty, Nils Robert EK, Lindsay David Jamieson, Mark Roy Nichol and
Peter Craig Minuk;
Jennifer Eichenberg;
David Bot, Leonard Walker, Burlington Rifle and Revolver Club;
Montreal Firearms Recreation Centre, Inc. and O'Dell Engineering Ltd.;
Canadian Shooting Sports Association

Marie-France Major and Cory Giordano, counsel for the International Practical Shooting Confederation Canada and Safari Club International

Matthew Estabrooks, agent for the Attorney General for Saskatchewan

Léa Desjardins, agent for the Attorney General of Alberta

Darius Bossé, agent for the Attorney General of Ontario

Padraic Ryan, counsel for the Attorney General of Ontario

David R. Elliot, agent for the Canadian Taxpayers Federation

Graham Ragan, agent for the Canadian Constitution Foundation

Thomas D. Gelbman, Mia Bertanjoli, and Rebecca Orsini, counsel for the Canadian Coalition for Gun Control

Daniel Hnatchuk, agent for the British Columbia Civil Liberties Association
R. Bruce Boynton, counsel for the Ontario Rifle Association

Jason Gratl, counsel for Canada's National Firearms Association

