



Dear Member of the European Parliament,

FIREARMS UNITED is a network of civil rights organizations that represents the interests of over 14 million authorized firearm owners, such as hunters, sport shooters, collectors and members of the military reserve.

In November 2015, the European Commission submitted, as a knee-jerk reaction to tragic events that unfolded in Paris, their proposal for directive 91/477/EC on control of the acquisition and possession of weapons. The proposal in its original form, submitted without impact analysis, has created an enormous amount of feedback that surely has not gone unnoticed.

First of all, we thank Vicky Ford and many of the rapporteurs for their hard work in improving the Commission's proposal, since the current draft by the Parliament is already miles better than the original proposal. However it still contains several issues that should be addressed during trilogue and removed from the final legislative text.

Unfortunately we are observing a raising trend of euroscepticism among hunters, athletes, firearms collectors and recreational shooters because most of the proposed measures are perceived as unfounded and unjustified. In other words, the actions of the Commission are threatening to alienate that one group of most law-abiding citizens, which contributes with its families, employees and friends towards stability and security of our society. **An example of this euroscepticism is the key fob pictured on page 3 which has been created by a one Swedish athlete and has been in great demand lately.**

FIREARMS UNITED team has not lost trust in the Members of the European Parliament. We still hope that during the trilogue, the additional restrictions against legal firearm owners are removed and the final directive supports the combat against illicit firearms trafficking while taking into account all effects on the licit firearms sector of EU to prevent irreversible damage to a very important sector of economy and to more than 100 million law abiding owners of firearms.

As the proposed measures do not contribute towards security and threaten to alienate a large group of citizens, we recommend to work with a capable body of experts consisting of criminologists, economists, lawyers and technical experts for firearms. We recommend also to follow the recommendations made by the four EU studies. If necessary, FIREARMS UNITED can provide expert level consultation free of charge.

Best Regards,
FIREARMS UNITED team

Always at your service – you can reach us via www.firearms-united.com/contact



How to Improve Directive 91/477/EC on Control of the Acquisition and Possession of Weapons in Three Simple Steps:

1. Remove Magazine Capacity and Length Restrictions -

It has been already done in USA on federal level from 1994 to 2004 and it has since been removed as a useless measure – because it did not work.

On state level there are restrictions still in effect in California, Colorado, Connecticut, Hawaii, Maryland, Massachusetts, New Jersey and New York – and it still does not work today as shown by recent tragic events that unfolded in San Bernardino.

Based on extensive research, we can with reasonable confidence point out the reason: Criminals do not, by definition, obey the law.

You can find 27 valid reasons to discard magazine capacity ban: <http://bit.ly/2beGX2c>

2. Remove Mandatory Health Checks and emphasize continuous monitoring -

Mandatory renewal of permits (and associated medical checks) introduces unnecessary bureaucracy and diverts authorities away from activities that contribute towards stability and security. As an example stopping the trade of illegal firearms could be considered as one of these activities.

3. Do not let Commission define conversion criteria for demilitarization -

Technical criteria for acceptable conversion from automatic firearm to semiautomatic should not be defined by the Commission due to lack of required technical expertise demonstrated by the technical quality and ideological nature of the original proposal.

The Exemptions

Based on past experience and legal review we would like to bring up the fact that the exemptions which are forcing people to become a member of a club or organization in order to obtain an exemption **have been already ruled to be against ECHR** (Ruling of the Dutch Supreme Court) and they are often against the constitution of those member states which have the freedom of association. This would in fact make it legally impossible to apply these exemptions.

The exemptions also rule out the existence of the recreational shooters, making the magazine exemption only for competitive shooters and reserve analogue to banning footballs from those not playing in the Champions League!



..... WWW.FIREARMS-UNITED.COM WWW.FIREARMS-UNITED.COM WWW.FIREARMS-UNITED.COM

Owners Of Legal Firearms Contribute Towards Safe and Stable Society:

- **Hunters** contribute towards security by controlling the population of animals which might pose danger. As an example of this activity, the continuous volunteer effort of hunters ensures that the deer and elk related road accidents and injuries remain at an acceptable level.
- Well trained and combat efficient **military reserve** acts as deterrent towards external aggressor and contributes to the security and stability of the society.
- **Authorized firearm collectors** are often renowned experts in their field and contribute both training and knowledge to the authorities.
- In countries where firearms permits are granted for the purpose of **self-defence** or defence of others, it has been clearly shown that it deters both terrorism and criminal activity. Examples of such countries are for example Czech Republic where 43% of all firearm permits are granted for personal defence purposes, closely followed by Lithuania (43%) and Slovakia (34%). (Source: Flash Eurobarometer 383)



Very Short Summary of EU EFFECT study - published in May 2016

Firearms crimes are usually not visible and therefore not a priority. Usually major events lead to tighter firearms legislation, which makes firearms control a political issue.

The role and influence of firearms owners groups

Engaging with these stakeholder organisations was viewed as necessary due to their representation of legitimate gun owners and also expert level knowledge which is not necessarily shared by those who are responsible for policy in this area.

Major Loopholes in current legislation

- Deactivation standards
- Definition of essential firearms components
- Unaligned conversion standards (Automatic to semiautomatic, functional to blank-firing)
- Antique weapons

Firearms legislation does not have impact on gun crime

One of the findings was that the current firearms legislation was missing its target due to the focus on legal ownership and acquisition, whereas gun crimes are illegal by definition and therefore not addressed directly by firearms legislation. It was brought up that citizens impacted by firearms legislation, were not criminals, but legal firearms owners who obey the laws.

Firearms controls creates market for illegal firearms

Participants interviewed also cautioned that a potentially unwanted side-effect of increasing controls on the legal acquisition and ownership of firearms is that these measures usually increase the number of illegal weapons.

In a combined country and individual-level analyses [...] it was observed that the high availability of firearms was associated with lower levels of victimization by contact crime in general, suggesting a potential deterrent effect of availability.

EU EFFECT Project <http://bit.ly/1rcD1my>

