

2022 Open-Ended Working Group (OEWG) NFA Presentation

Greetings to the chair,

My name is Charles Zach and I represent Canada's National Firearms Association (NFA) which was formed in 1978 and became a registered Canadian gun lobby in 2013, and an NGO with the United Nations in 2015, having achieved Special Consultative Status within The Economic and Social Council of the U.N. I speak to you today on behalf of the estimated 4 million + law-abiding Canadian firearms owners who are concerned about the UN's proposed ammunition marking, tracing and monitoring scheme negatively affecting their ability to freely acquire, legally possess and safely use ammunition.

Canadian recreational shooters, professional competitors, collectors and hunters spend over 8.5 billion CDN dollars a year on their hobby. They collectively fire an estimated 1 million rounds of ammunition every day. Women are increasing active in shooting, especially handguns. The Canadian firearm and ammunition industry employs almost 50,000 people and plays an integral role in the domestic economy. Almost all guns, ammunition and related gear sold in Canada are imported mainly from the US. Canada has a proud and long-standing civilian firearms heritage, culture and tradition that grows stronger every year.

Canada also has a strict gun control system and records show that Canadian firearms owners are not responsible for any of the illicit bulk transfer of ammunition to unauthorized foreign or domestic end users. The ammunition manufacturing sector is relatively small in Canada but is highly regulated and required to account for all its sales of ammunition inside and outside the country. Most end user civilian ammunition is in fact imported from first world countries who are also subject to stringent ammunition import export regulations that includes marking, tracing and monitoring. In short, Canada is not one of the many global bad actors responsible for the illicit transfer of bulk ammunition to unauthorized foreign end users.

The Open-Ended Working Group (OEWG) 'through life ammunition management scheme presented before us seems to be advocating for a universal requirement of all states to mark shells and cartridges with symbols or marks denoting: lot number; manufacturer and country of manufacture; year of manufacture; and a code identifying the original recipient of the ammunition lot. As previously mentioned, such product identification requirements already exist in several countries like Canada. Ammunition manufacturers are also warning that it would be very expensive to mark every bullet cartridge to suit. They argue that marking each bullet and implementing the mandatory record-keeping system would not only be a massive invasion of privacy but it would impose such burdensome overhead costs, that it would make their final products unaffordable to average citizens and threaten the very viability of their business.

By Charles Zach, Executive Director, Registered In-house Lobbyist, **Canada's National Firearms Association**

Canadian firearms and ammunition end users are rightfully suspicious because the initial deliberations were done in closed preparatory sessions not open to NGO's. They have many unanswered questions regarding the proposed OEWG through life ammunition management scheme. Namely:

1. Would Canadian firearms owners be mandated to register their unmarked stockpiles of personal ammunition, spent cartridge brass and/or handloading supplies and equipment?
2. Would Canadian civilian ammunition be required to be marked?
3. Could unmarked ammunition or spent cartridge brass held by civilians become prohibited?
4. Could there be a cap imposed on the amount of ammunition a civilian can possession?
5. Where is the empirical evidence that concludes this OEWG marking scheme will actually deter the illicit transfer of bulk ammunition to unauthorized end users?
6. Is the proposed OEWG ammunition marking scheme just another veiled back door scheme to usher in incremental global civil disarmament?

Canadian firearms and ammunition end users and manufacturers are not the problem here and should not be held responsible or made to pay the price for miscreants and bad state actors who illicitly transfer ammunition to unauthorized foreign end users. Therefore, we demand that Canada not be a party to this misguided and nonsensical OEWG ammunition marking scheme because we are concerned that it will only negatively impact innocent law-abiding Canadian ammunition end users for no good reason. We urge others to also reconsider supporting and advancing this ill-conceived scheme that is doomed to failure. We suggest a more effective solution for only select military bullet cartridges is to provide a unique serial number for packaging units at the smallest size possible and forgo the impractical and unworkable idea of marking every round of ammunition produced.