

## **Executive Summary:**

We, the law abiding shooters in EU, represent the voice of European firearm owners and competitive shooters and national organizations, are writing to you to offer our firearms expertise to support you in your task to make Europe safe again.

### **We strongly advise against the following measures:**

- Banning or restricting semiautomatic firearms. Recent events (2006) in Belgium have shown that restrictions lead to situation where formerly legal and license controlled firearms become illegal firearms. This will create a yet another source of illegal firearms for criminals and surely this is not the wanted outcome.

### **Summary of Proposed measures:**

What we suggest as immediate and visible measures to prevent accidents like these in the future:

- Alignment of the "essential parts of a gun" requiring a permit in different countries so that one cannot buy without a permit a receiver from one country where it is legal, and barrel and lock from other country where they are legal and assemble illegal firearm that way.
- Cut firearms related permit handling bureaucracy by having a single permit per shooter which gives access to firearms. Permits that have to be renewed every few years, or permit per firearm is a gigantic waste of government resources which could be better utilized to combat terrorism and organized crime
- CCW (concealed carry weapon) should be studied as an option to provide security and protect citizens from acts of random violence.
- Alignment of the proper and permanent firearm deactivation standards and in different EU countries. We are aware that guns deactivated in Germany are considered illegal firearms in Finland due to more strict standards adopted by Finland.
- Alignment of markings in firearms in EU countries.- Align and harmonize databases in EU area thus allowing law abiding citizens to acquire firearms through legal process, but to stop the criminal element from having firearms. Also, we suggest more cooperation and exchange of information between authorities.

Below you can find more details and facts to support you in your decision making during these challenging times.

Dear Sir,

We, the law abiding sports shooters in EU, are writing to you to offer our opinion to support you in the current tense atmosphere due to recent attacks in Europe. As you well know, the terrorists are not law-abiding citizens, and do not share our view on open and free society based on democracy and right to both pursue happiness and protect our loved ones, therefore by definition they are not going obey restrictions on the current and or revised gun directive.

We are well aware of recent developments and also very well aware that the illegal firearms could potentially be sourced through loop holes in EU legislation and that by breaking multiple laws on purpose the firearms could be made functional and automatic again.

We are concerned that current pressure to achieve swift and visible results may lead to potential unwanted and adverse effects on the security of the European countries, future of sports shooting and protection of ownership to name a few.

Therefore, to support you in your task to prevent incidents like this in the future with our expertise when it comes to firearms, we have analyzed the potential solutions and would like to bring up the perspective of law abiding citizens and hope that their rights are not violated in the process.

You must already be painfully aware, that there are stockpiles of illegal firearms left as legacy of the Soviet Union when it fell and illegal full auto-firearms can be had with relative ease while the freedom of movement enables transportation of those illegal firearms to Western Europe with potentially fatal consequences.

Therefore, we suggest concentrating main efforts towards blocking this source of firearms with stricter border control also inside the Schengen area.

The ban of semiautomatic sporting rifles (which might look like military weapons to untrained eye) is not going to help because weapons like that are already under license control and cannot be bought without a permit. The ban of legal civilian ownership however would have negative consequences in the long run - many countries in the eastern border of the EU still rely on large trained reserve of military aged males to defend their countries and these members of the reserve usually dedicate their own time and financial resources to maintain their own skill set with their privately owned semiautomatic firearms.

Therefore, we are strongly against limitations to these weapons since ban would actually compromise the integrity and safety of EU. Also, there are huge number of legal firearms, and semiautomatic firearms represent big portion of those. Banning them would mean that expensive firearms would be sold illegally rather than turned in which means new source of illegal firearms inside EU. This is what happened in Belgium in 2006. Surely, this is not the wanted consequence.

Same applies to legal demilitarized firearms owned by shooters and used in IPSC shooting or hunting - they are not part of the problem in this case, quite contrary if employed in responsible fashion they are an instrument of security and stability in EU member countries.

There are recent experiences even in Europe (Belgium, 2006) where the result of gun ban was that out of 870 000 firearms, around 200 000 were turned in and destroyed and the rest were not turned in. This turned legal firearms into yet another source of illegal firearms and we are still seeing the impacts of this as there are large number of illegal firearms floating around.

Banning semiautomatic firearms would also practically end many of the common and popular shooting sports. If something like that were to happen, the terrorists would impact the life of law abiding citizens and their goal would be reached. We must not give in to terror.

Changing permits to be renewed every 5 which is also proposed by EU would create a staggering amount of paperwork and cost, instead we propose streamlining the process of having a single permit per shooter allowing access to weapons of certain types – effective until stated otherwise. This would save cost and enable authorities to concentrate on real threat – not paper pushing.

The option to do nothing is clearly not on the table.

What we suggest as immediate and visible measures to prevent accidents like these in the future:

- Alignment of the "essential parts of a gun" requiring a permit in different countries so that one cannot buy without a permit a receiver from one country where it is legal, and barrel and lock from other country where they are legal and assemble illegal firearm that way.
  - Alignment of the proper and permanent firearm deactivation standards and in different EU countries. We are aware that guns deactivated in Germany are considered illegal firearms in Finland due to more strict standards adopted by Finland.
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In addition to this, there is one more measure, which surely would be both bold and visible, and would, when implemented properly increase the safety and decrease crime in EU area:

The topic of CCW (concealed carry weapons) have not been studied or tried in Europe on wider scale, but experiences have been extremely promising so far. According to statistics law abiding citizens carrying firearms have actually reduced crime rate and today cities known for their crime rates are usually the cities with strictest gun control. As measure, we feel that this topic should be studied further because law abiding citizens with firearms and necessary knowledge how to use them, could stop acts of terror or at least limit the casualties. Law enforcement is spread thin as is, and the police cannot protect every law abiding, tax paying citizen all the time. These random acts of terror not only exploit unaligned weapon deactivation standards, but also exploit this security vacuum.

Also, please note that we are not suggesting handing out bullets - we are merely pointing out that law abiding citizen, with firearm, in a wrong place at the right time could make the difference between successful act of terror and a foiled plot.

The weakness in this approach is that firearm alone is not enough, as terrorists have shown, also the will and skill how to use firearms play a role in determining the end result - as we saw in the Thalys train where the terrorist was luckily unable to clear a jammed firearm. Therefore we suggest a mandatory training and a mandatory skill tests as a minimum requirement for anyone to qualify as CCW license holder. This would potentially create new jobs to all EU countries adopting this principle (training, tests, process, etc), enhance the security and demonstrate proper and bold out-of-the box thinking and send a strong message that EU is determined to put a stop to attacks like these in the future.

We hope that this feedback reaches the correct stakeholders and wish that whatever the decisions may be, the security, the rights and property of the citizens of the European Countries are not compromised as this would mean that the adversaries of the European way of living and the European society have already won.

Please remember these points when evaluating your stance when it comes to recently published revised firearms directive proposal.

Thank you for taking the time to read this.

Best Regards,