

The Administrative Committee, Finnish Parliament

E 60/ 015 Government report: Proposed changes to firearms legislation
Finnish Department of internal affairs memo SM2015-00353 / 10.27.2015 (Changing Firearms Directive / Hannele Taavila)

Proposal to amend the EU Firearms Directive

The Finnish Shooting Forum would like to thank the Committee for the opportunity to put forward its views and opinions regarding the proposed amendments to the European Union Firearms Directives.

The Finnish Shooting Forum welcomes the Interior Ministry's reference document in preparation of memorandum. The Finnish Shooting Forum agrees with the ministry's view that reclassifying self-loading (semi-automatic) firearms under Category A of the Firearms Directive, and banning their possession by private individuals, will cause serious harm to the Finnish national interest. The Finnish Shooting Forum strongly believes that the directive should not be opened for inspection purposes.

A prohibition on the possession of self-loading firearms by private individuals would have a detrimental effect on the activities of voluntary reservists and this would have a negative impact on national defence capability.

The Finnish defence model relies on a large standing reserve coupled with voluntary defence training, a significant part of which comprises the continued training and practice of shooting skills. Stricter directives that prohibit the civilian ownership of self-loading firearms would have a destabilising effect on these essential voluntary defence-related activities.

In addition to the disruptive effect on defence capability, a ban on the possession of self-loading firearms by private individuals would significantly impede other hunting and target shooting related activities (including the Olympics).

Sports shooting, particularly practice pistol shooting (e.g. competitions organised by the International Practice Shooting Confederation), together with other practical shooting disciplines using self-loading rifles, shotguns and pistols, would all cease to exist if the proposed ban were to become law.

Finland should also continue efforts to ensure the rights of registered firearms collectors to continue their hobby in the future.

The Finnish Firearms Forum agrees with the content of the reference document memorandum with regard to online commerce and distance selling. The trading sector should not be set categorising obstacles, however trade in firearms must take place within a framework of rules to prevent illegal trafficking. In practice this should include the identification of both parties involved in the trade, permit requirements for buying/selling and secure arrangements for the transport and delivery of firearms.

Additional Statement of Shooting Forum

It is the opinion of the Finnish Shooting Forum, that the memorandum presented does not define clear and concise reasons for the alleged pressure to change current laws in order to prohibit the possession of these firearms and their online sales. Finland should obtain a more specific explanation from the European Union institutions regarding this matter.

The Finnish Shooting Forum shares the widespread shock following the recent horrific terrorist attacks that took place in France. However these recent events cannot exclusively lead to changes in the regulations for all member states of the European Union. The Finnish Shooting Forum strongly opposes any measures which would unjustly punish law-abiding and responsible firearms holders, by restricting or withdrawing their rights to practice their hobby.

The European Union and its member states should instead work together and focus their efforts to combat illicit arms trafficking and illegal possession of firearms.

Banning registered collectors from possessing fully automatic firearms, or registered practical shooters from possessing self-loading firearms that resemble military weapons, carries the risk that such firearms are erroneously reported lost or stolen, and end up on the illicit market.

Any amendment to the Directive has the potential to result in the expropriation of privately-held firearms. Expropriation of private property should result in current owners being fully compensated. The redemption cost has been estimated to run in to hundreds of millions of Euros. The allocation of a similar sized financial resource towards public safety, and the pan-European fight against illicit arms trafficking by the police, border guard and customs operations, would achieve a much greater effect.

Shooting Forum also notes:

1. Firearms classification according to the directives: Firearm safety is not created by the technical classification of different firearms; Firearm safety is achieved through legislature and executive law which focuses on the user and the demand for legitimate purpose.
2. Magazine capacity of firearms: Categorical restriction of magazine capacity is not the solution to increased firearm safety. The technical properties of a firearm must be assessed and aligned with the requirements of the legitimate purpose for which it will be used, not by theoretical fire power (rate of fire, magazine capacity, range, impact effect).
3. Self-loading firearms: A ban on self-loading firearms is very problematic for competitive sports shooters and it does not necessarily improve firearm safety. Replacement of self-loading firearms, to the extent that replacement is possible, with pump action or bolt-action firearms, would bring unbearable costs for gun owners and would result in pointless and costly bureaucratic work for licensing authorities.
4. Biometric identification (smart gun technology): The development of smart technologies to improve firearm safety is not yet mature enough to be taken in to widespread use. The possibility of smart technologies for retrofitting to old firearms is not self evident and would presumably also bring very significant costs.
5. Deactivation of firearms: Deactivating firearms should not, in principle, be denied, however technical implementation-, acceptance-, supervision- and safety labelling requirements for deactivation should be clearly defined. Aesthetic values should be taken in to consideration during technical implementation.
6. The right of firearms possession: The current directive should be extended to cover all firearms, so that they are at least part of the notification procedure. National legislation instructions are good enough, at least in Finland, for the evaluation of the suitability of individuals to hold a firearm permit. Assessing the preconditions for permit possession does not need clarification in Finland, but

licensing authorities throughout Europe should have common practices.

7. Internet sales or restriction of mail order sales: No marketing method should be categorically denied, however the arms and ammunition trade shall be subject to clear requirements for implementing the sale, identification of the buyer, as well as transport and delivery of the firearm.

The Finnish Shooting Forum has previously sent a document on this same subject to the Ministry of Interior and the Ministry of Defence, 28 October 2015.

Mikko Taussi
Chairman of the Finnish Shooting Forum

Finnish Shooting Forum

The Finnish Shooting Forum is a consortium of shooting hobby-promoting organisations, the aim of which is to guarantee the possibility for private individuals to pursue shooting-related recreational activities in our country in the future. The Shooting Hobby Forum's job is to jointly influence decision-making at national, regional and local levels, in order to safeguard recreational shooting.

Close to 800 000 Finnish citizens hold a firearm possession permit and there are around 1,6 million legally-held firearms in Finland.