



*This is a translation of a letter,
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Ministry of Interior, Finland,
Ministry of Defence, Finland

Possible Updating of European Firearm Directive

The Finnish Shooting Forum is truly worried on behalf of all shooters and firearm industry in Finland about the on-going process to tighten the rules and procedures of the European firearm directives¹. The Finnish Shooting Forum takes it for granted that Ministry of Interior (FIN) and other appropriate governmental bodies will defend Finnish national rights, benefits and traditions concerning European firearm directives. The Finnish Shooting Forum hopes that government of Finland will decisively lay focus to fight illegal firearms and ammunition trafficking and criminal acts.

The Finnish Shooting Forum is worried about the situation of shooting sport, biathlon, hunting, weapon collectors, historical weapon shooters and vast amount of armed forces reservist: the new directive may seriously complicate these activities compared to the current situation regulated by the existing directives or, in the worst case, the new directive may even discontinue civilian shooting. Purchasing and possessing of the critical shooting sport equipment, like rifles and pistols, for World or European championships of many world wide organizations (like International Shooting Sport Federation ISSF, International Practical Shooting Confederation IPSC and Federation Internationale de Tir Aux Sportives de Chasse FITASC), or even the shooting as an original Olympic Games discipline, may come to a total end.

Shooting in its large diversity including hunting, armed forces reservists' shooting and elite sport shooting, is very popular in Finland and has long traditions. In parallel with its hobby and recreational purposes, it has extremely important role in the Finnish history as means for providing nourishment and as national security and defence. The Finnish defence model and its large reserve, which is widely accepted by Finnish citizens, counts on voluntary military training system, where shooting skills are the most important. Any more strict directives in Europe like prohibition of semi-automatic guns from civilian shooters will seriously harm voluntary defence.

The Finnish Shooting Forum respectfully asks to pay attention to the following key points in the existing directives

1. **Firearms categories redefinitions;** there is no need to redefine current firearm categories. Automatic and semi-automatic weapon categories should be maintained as they exist in the current directives. The appearance of weapons (e.g. "black guns") should not be used as a key factor for categorizing weapons but the operating principle and other facts. Instead of promoting gun safety by technical weapon categorizing, legislation and law enforcement bodies should focus on demands for users and purposes of use.
2. **Firearm magazine capacity;** categorized restrictions to capacity of magazines is not a solution for improving firearm safety. The basis for evaluation of attributes of firearms should be done according to the features of shooting disciplines, not to a theoretical firepower (maximum rate of fire, range, hit probability and effect on target etc). The situations for use of maximum firepower are very exceptional.
3. **Semi-automatic firearms;** Prohibition of semi-automatic firearms in extensive recreational and target shooting is very complicated and does not necessarily improve firearms safety. Besides safety issues one must realize that semi-automatic firearms are an essential part of many

¹ European Union directives 91/477/EEC and its amendment 2008/51/EC

shooting activities like high-level target shooting (e.g. 25 meter rapid fire shooting), hunting (semi-automatic shotguns), firearm collectors (historical firearms) and armed forces voluntary reservist training (tactical shooting). The prohibition of semi-automatic firearms would possibly stop many shooting disciplines. Furthermore, the substitution of semi-automatic firearms, if possible at all, with single shot firearms would mean enormous costs for firearm owners and both futile and expensive bureaucratic work for police departments.

4. **Smart gun technology;** Biometric or RFID (etc) guns must be resisted as neither qualification tests nor fully reliable systems exist. Besides, retrofitting older weapons may not only be very expensive but also impossible.
5. **Deactivation of firearms;** deactivation of firearms should be possible also in future. In order to have safe deactivation system, there should be unambiguous requirements how to perform actual deactivation, acceptance and monitoring system and safety markings, which respect of aesthetic values of the original firearm.
6. **Reassessment of legal possession;** current directives should be expanded in a way that every firearm should at least be registered. The authorities must concentrate on assessing the reliability of the permit applicant instead of assessing sports firearm technology. Furthermore, conditions for possession of firearms should be similar all over the European Union.
6. **Sales in Internet or mail orders;** any distribution channel should not be categorically prohibited but sale of firearms or ammunitions should be regulated more thoroughly, for example how to identify a buyer, how to arrange the shipment of items or which procedures are needed when a firearm is handed over to the customer.

The above mentioned solutions should be in force also in governmental activities in order to have overall coverage in firearm safety.

The Finnish Shooting Forum supports increase of safety of the society and all its citizens. Although there have been some awful deeds with firearms, the use of firearms in crimes should be regarded as a part of the wider perspective and compared to numbers of different kinds of means used for committing a crime. Firearm crimes have got a lot more publicity than they actually deserve. Firearms used in crimes have in most cases been unauthorized or illegal. Anyhow, the Finnish Shooting Forum declares that every single crime done using firearms is futile and unjustified. Instead of producing more strict directives and national laws, European Union and governmental bodies should focus more resources and put more emphasis on unauthorized and illegal firearms possession, trafficking and sales on national, multinational and European Union's external borders.

The Finnish Shooting Forum suggests that it could, either directly or represented by its member organizations, be involved in the process of formulating Finland's national position in developing firearms directives and legislation.

Tampere, Finland 29.10.2015

Mikko Taussi

The Chairman of the Finnish Shooting Forum

The Finnish Shooting Forum is a shooting and firearm community of which mission is to promote interests of shooting activities in Finland. The task of the Finnish Shooting Forum is to influence political decision makers on national, regional and local level in order to safeguard prerequisites of shooting. The Finnish Shooting Forum consists of Finnish Sport Shooting Association and Finnish Biathlon Association as elite sport organization; The Finnish Wildlife Agency and Finnish Hunting Union as hunting organisations; the National Defence Training Association of Finland, the Finnish Reservist Sport Association, the Finnish Reserve Officers' Federation and the Finnish Reservists Federation as armed forces reserve organizations. Furthermore Firearms Trade Association and Armshistorical Association are members of the Finnish Shooting Forum. Number of firearms license holders is 700 000 - 800 000 in Finland.