

Fair Trade Group – BMS4

June 16th, 2010

Thank you Mr. President:

My name is Rob Talley and I serve as the Executive Director of the FAIR Trade Group representing the interests of businesses involved in the legal import and export of firearms across international boundaries. Our membership supports efforts to minimize global violence and restrict the illicit trade in small arms and light weapons but we are concerned that trade servicing the legitimate personal and sporting use of firearms must exist also.

We believe it is imperative to clearly define small arms and light weapons. Failure to develop a clear definition now will only heighten confusion later. It is clear that the primary issue of concern in areas of conflict is the illicit trafficking in fully automatic firearms and more powerful armaments. It is appropriate for this body to focus on these armaments to maximize the benefits of these efforts.

Controlling illicit transactions should not unduly burden the legitimate commercial trade. Even in the United States, our regulatory initiatives provide examples of how not to develop international regulations. In the US, the cost to file for a license to export a single rifle is the same as the cost to acquire a license to export a military jet aircraft, rocket launcher or missile. In fact, in order to export \$100 worth of firearms parts like springs or butt stocks we must pay \$250 for a permit. This is an example of how not to structure a new international regime. Instead, any regime must be sufficiently transparent and workable to allow for legitimate in firearms, parts and ammunition transactions to continue.

Finally, it is misguided to place such a significant emphasis on the elimination of trade in surplus or obsolete semiautomatic military firearms or parts for surplus military firearms. Many of these firearms have significant collectable value and are generally not the kinds of firearms that are surfacing in areas of conflict. These firearms are in function, at best, the equivalent to modern day hunting rifles and to continue to focus on banning transactions in these goods fails to focus limited resources on addressing legitimate illicit transactions to areas of conflict.

Thank you for your time and willingness consider the impacts that a poorly crafted regime could have on legitimate transactions subject to the new system.