

Review of rules of export authorisation, and import and transit measures for firearms

Fields marked with * are mandatory.

1

Introduction

Current [EU legislation on exports, imports and transit of civilian firearms](#) is part of an overall legal and operational framework aiming to prevent, detect, investigate and prosecute firearms trafficking and implement Article 10 of the [UN Firearms Protocol](#). The UN Protocol is a key international agreement adopted in 2000 to ensure firearms traceability and was ratified by the EU.

The EU also has [rules on the acquisition, possession and transfers of civilian firearms within the EU](#) but these are not being addressed in this initiative. **This public consultation does not deal with intra-EU transfers of firearms.**

Preventing diversion from the legal trade to the black market remains a priority in international trade and the legislation needs to be adapted to current threats (for instance the increasing use of converted alarm and signal weapons, the import of unmarked essential components of firearms), as recognised by the European Union's [2021 Serious and Organised Crime Threat Assessment \(SOCTA\)](#).

The Commission has published an [inception impact assessment](#) and is consulting the public to review of rules of export authorisation, and import and transit measures for civilian firearms . Other data and evidence gathered by the Commission will feed into the analysis. Initial consultation of stakeholders already took place in those contexts.

As part of this initiative, this consultation provides all stakeholders, notably firearms users (hunters, sport shooters), manufacturers and public authorities with an additional opportunity to voice their opinions on current problems and the future of EU rules on exports, imports and transit of firearms, including possible ways to streamline, enhance, develop, modernise and facilitate the existing framework.

The questionnaire is structured according to four main sections: *(i) personal details, (ii) questions on problems and objectives, (iii) need for EU action, possible policy options and (iv) impacts.*

2 About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish

- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

Are you an economic operator (arms dealer, arms manufacturer, arms broker) - incl. business associations/federations?

- Yes
- No

* First name

Olivier

* Surname

Van Herstraeten

* Email (this won't be published)

o.vanherstraeten@esfam.eu

* Organisation name

255 character(s) maximum

Association of European Manufacturers of Sporting Firearms (ESFAM)

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

572813043948-74

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|-------------------------------------|--------------------------------|-------------------------------------|---|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> | <input type="radio"/> Lithuania | <input type="radio"/> |

- | | | | |
|---|---|--|--|
| | Dominican Republic | | Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Korea |
| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |
| <input checked="" type="radio"/> Belgium | <input type="radio"/> Germany | <input type="radio"/> Montenegro | <input type="radio"/> Spain |
| <input type="radio"/> Belize | <input type="radio"/> Ghana | <input type="radio"/> Montserrat | <input type="radio"/> Sri Lanka |
| <input type="radio"/> Benin | <input type="radio"/> Gibraltar | <input type="radio"/> Morocco | <input type="radio"/> Sudan |
| <input type="radio"/> Bermuda | <input type="radio"/> Greece | <input type="radio"/> Mozambique | <input type="radio"/> Suriname |
| <input type="radio"/> Bhutan | <input type="radio"/> Greenland | <input type="radio"/> Myanmar/Burma | <input type="radio"/> Svalbard and Jan Mayen |
| <input type="radio"/> Bolivia | <input type="radio"/> Grenada | <input type="radio"/> Namibia | <input type="radio"/> Sweden |
| <input type="radio"/> | <input type="radio"/> Guadeloupe | <input type="radio"/> Nauru | <input type="radio"/> Switzerland |

Bonaire Saint
Eustatius and
Saba

- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
- Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United States
- Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not

be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

3 QUESTIONS CONCERNING CURRENT PROBLEMS

* In your view, how important it is to have common EU rules on **imports** of civilian firearms from outside of the EU?

- Not important
- Slightly important
- Moderately important
- Important
- Very important
- I do not know

* In your view, how important it is to have common EU rules on **exports** of civilian firearms outside of the EU?

- Not important
- Slightly important
- Moderately important
- Important
- Very important
- I do not know

* How important is the current administrative burden created for you **personally** (also as an economic operator) by current EU rules on **exports** of civilian firearms?

- Non-existent
- Slight
- Moderate
-

Important

Very important

I do not know

The Commission has preliminarily identified a number of challenges that could hamper **the legal movement of civilian firearms**. For each of them, can you mention to what extent, in your view, they create a burden for legal movements of civilian firearms?

	not at all	small extent	moderate extent	high extent	very high extent	I do not know
* Non uniform rules on exports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Non uniform rules on imports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Lack of a clear distinction between civilian and military firearms (and lack of clarity about the applicable procedure)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Single market rules apply to more goods (e.g. deactivated firearms, automatic firearms) and persons (brokers, collectors) than import/export rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The need to have the express prior authorisation of transit countries before granting an export licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Different national rules for simplified procedures (hunters, sport shooters, repair, exhibition, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Paper-based procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Obligation to submit translations of supporting documents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Fees for export authorisations or transit inside the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* No use of the global export authorisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you see additional challenges that may hamper legal movements of civilian firearms, can you please describe them here along with their relative importance?

2000 character(s) maximum

ESFAM is opposed to more (import) controls of semi-finished unmarked components for the following reasons:
- the term of "semi-finished" components is vague and could raise many problems of interpretation in each Member State ("MS");

- controlling the importation of such components would most likely increase the administrative burden of the manufacturers;
- it is unclear what kind of controls would be required (marking ? license?);
- the traceability of firearms and components (including marking), are all matters that fall within the competence of the Directive 91/477/CEE and outside the scope of the Regulation
- Lack of transports and banks willing/authorised to work with the firearm industry : high extent.
- No automatic mutual recognition within the EU of firearm marking despite its compliance with the laws of the MS where it was manufactured or first imported : very high extent -> need for separate marking and thus stock for MS that transposed the EU Directive 91/477 differently -> potential conflicts between the laws of the MS manufacturing the firearm and the laws of the MS where such firearm will be purchased/placed on the market.
- In some jurisdictions, civilian firearms are considered as military firearms in the context of sanctions /embargos. As thus, some countries cannot fulfil the needs of the civilian market in a non-EU country under (military weapon) embargo while other EU countries can : very high extent.
- National regulations are becoming more and more complex and make it hard for small enterprises and end-users to be in compliance (especially as regards to tracing of firearms - for instance, the RGA in France and the NWR in Germany) : very high extent.
- In some jurisdictions, national authorities consider that every component/part of a firearm is subject to export control (both within the EU and with non-EU countries) which is way stricter than the EU position where only essential components/essential parts are subject to export controls

Without further EU intervention, how do you think the legal movements of civilian firearms will develop in the next 5-10 years?

- The situation will improve: the current framework will be enough to ensure seamless legal movement of firearms, and increased cooperation and exchanges of best practices will bring more consistency in the application of the rules.
- The situation will remain unchanged: the current framework will be enough to ensure legal movement of firearms, but current difficulties will not be overcome.
- The situation will deteriorate: economic operators and legitimate firearms owners will be faced with increasingly heterogeneous national rules and procedures.
- I do not know

Without further EU intervention, how do you think firearms trafficking will develop in the next 5-10 years?

- The situation will improve: the current framework will be enough to ensure increased cooperation amongst law-enforcement agencies, more intelligence gathering, and increased detection of smuggling of firearms.
-

The situation will remain unchanged: the current framework will be enough to ensure proper law enforcement cooperation, but intelligence-based targeted checks at import and export will remain defective.

- The situation will deteriorate: exports (or diversion) of firearms to conflict zones and dictatorships, and smuggling of firearms, their components, and convertible weapons into the EU will increase.
- I do not know

Is there anything else you would wish to add or mention on the problems regarding imports and exports of civilian firearms to and from the European Union?

2000 character(s) maximum

Cf. our published feedback (reference : F2660572; submitted on : July 1st 2021).

Please also note that European measures in order to create a common legal framework to regulate the transport of civil firearms and ammunition would improve the import, export and transit to and from the European Union.

4 NEED FOR EU ACTION AND POSSIBLE POLICY OPTIONS

* In your view, is there a need for EU intervention on current rules on import, export and transit of civilian firearms?

- Yes
- No
- I do not know

* Do you see the need for new tools to improve current rules on import, export and transit of civilian firearms?

- Yes
- No
- I do not know

For the two previous questions, please provide more detailed considerations

2000 character(s) maximum

- No automatic mutual recognition within the EU of firearm marking: potential conflicts between the laws of the Member State manufacturing the firearm and the laws of the Member State where such firearm will be

purchased/placed on the market : EU needs to intervene to implement such mutual recognition but shall not intervene in any way on the marking itself (content, format etc.).

- In some jurisdictions, civilian firearms are considered as military firearms in the context of sanctions /embargos. As thus, some companies cannot fulfil the needs of the civilian market in a country under (military weapon) embargo while other EU companies can : this creates unfair competition within the EU. EU intervention is thus necessary to clarify the distinction between civilian and military firearms in the context of sanctions (embargos) on the basis of the respective annexes of Directive 2021/555 and Directive 2009/43. Such clarification shall have for effect to change the interpretation done so far by such jurisdictions' relevant authorities.

- National laws and regulations are becoming more and more complex and make it hard for small enterprises and end-users to be compliant – if EU is to implement new tools, there is a risk of complexity it even more which would have a significant economic impact.

- In some jurisdictions, national authorities consider that every component/part of a firearm is subject to export control (both within the EU and with non-EU countries) which is way stricter than the EU position where only essential components/essential parts are to be subject to export controls. For the purpose of trade facilitation, EU intervention is thus necessary to clarify that only essential parts shall be under export controls and not any and all components of a civilian firearm (for trade within the EU as well as for trade with non-EU countries). Such clarification shall have for effect to change the interpretation done so far by such jurisdictions' relevant authorities

If EU intervention was considered necessary, what should be its main focus?

	Uniform import / export procedures	Tracing of firearms	Exchange of information	Trade facilitation	Other
* Non-legislative measures (guidelines, recommendations)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Clarification of existing legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* New legislative provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* I do not know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain.

2000 character(s) maximum

- No automatic mutual recognition within the EU of firearm marking: potential conflicts between the laws of the Member State ("MS") manufacturing the firearm and the laws of the Member State where such firearm will be purchased/placed on the market : EU needs to intervene to implement such mutual recognition but shall not intervene in any way on the marking itself (content, format etc.).

- In some jurisdictions, civilian firearms are considered as military firearms in the context of sanctions /embargos. As thus, some companies cannot fulfil the needs of the civilian market in a country under (military weapon) embargo while other EU companies can : this creates unfair competition within the EU. EU intervention is thus necessary to clarify the distinction between civilian and military firearms in the context of sanctions (embargos) on the basis of the respective annexes of Directive 2021/555 and Directive 2009/43.

Such clarification shall have for effect to change the interpretation done so far by such jurisdictions' relevant authorities

- National laws and regulations are becoming more and more complex and make it hard for small enterprises and end-users to be in compliance – if EU is to implement new tools, there is a risk of complexify it even more which would have a significant economic impact.

- In some jurisdictions, national authorities consider that every component/part of a firearm is subject to export control (both within the EU and with non-EU countries) which is way stricter than the EU position where only essential components/essential parts are to be subject to export controls. For the purpose of trade facilitation, EU intervention is thus necessary to clarify that only essential parts shall be under export controls and not any and all components of a civilian firearm (for trade within the EU as well as for trade with non-EU countries). Such clarification shall have for effect to change the interpretation done so far by such jurisdictions' s authorities

To what extent do you think the following measures could contribute to improved legal import, export and transit of civilian firearms?

	not at all	small extent	moderate extent	high extent	very high extent	I do not know
* Clarifying the distinction between military and civilian firearms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Having for civilian firearms the same licensing procedure as for military ones	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Digital import and export licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Set out clear rules for "simplified procedures"	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Linking simplified procedures to the status of Authorised Economic Operator Safety /Security	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Replace the global authorisation by a general export authorisation for specific countries and exporters (authorised economic operators)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Systematically assuming the agreement of non-EU country of transit in the absence of a reply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Removing the obligation to provide translations of supporting documents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Publishing a list of competent authorities (including in non-EU countries)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* No fees for authorisations and transit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain.

2000 character(s) maximum

Please explain why.

2000 character(s) maximum

5 EVALUATION OF THE IMPACT OF OPTIONS

For each of the measures mentioned below, please indicate how they would affect, for you **personally**, the administrative burden.

	very negative impact	negative impact	no impact	positive impact	very positive impact	I do not know
* Clarifying the distinction between military and civilian firearms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Having for civilian firearms the same licensing procedure as for military ones	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Digital import and export licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Set out clear rules for "simplified procedures"	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Linking simplified procedures to the status of Authorised Economic Operator Safety /Security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Replace the global authorisation by a general export authorisation for specific countries and exporters (authorised economic operators)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Systematically assuming the agreement of non-EU country of transit in the absence of a reply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Removing the obligation to provide translations of supporting documents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Publishing a list of competent authorities (including in non-EU countries)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* No fees for authorisations and transit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Ensuring that convertible alarm and signal weapons are always classified as firearms at import	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Ensuring tracing of deactivated or converted firearms, regulating the activities of brokers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Homogenising the processing of requests for import licenses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Homogenising the processing of requests for export licenses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Systematic check of criminal records in other EU Member States before granting an import /export licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Exchange of information on refusals to grant import or export authorisations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Computerised data-filing systems of import or export authorisations (and exchange of information)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Imposing marking of the first country of import	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Limiting imports of unmarked semi-finished essential components	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Sharing and analysing general statistics on imports, exports and seizures of firearms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Clarifying the role of customs authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*						

Clarifying the roles of competent authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Requiring end-use certificates at export	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Stepping up post-shipment controls	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* National inspection systems to check whether the conditions of an export licence continue to be met	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Where possible, for the above measures, could you provide a quantitative estimate of the impact on administrative burden (average monthly full-time equivalent, costs)?

2000 character(s) maximum

If you wish to add further information — within the scope of this questionnaire — please feel free to do so here.

2000 character(s) maximum

Concerning alarm and signal weapons, ESFAM considers that alarm and signal weapons must meet corresponding technical criteria, so that conversion must not be possible in order not to fall under the EU Firearms Directive. If alarm and signal weapons do not comply with these technical requirements, they are classified as firearms under the EU Firearms Directive and would then also have to comply with the regulations of the EU Firearms Regulation with regard to import and export.

* Please indicate here whether you would agree to be contacted to discuss your answers and provide more detailed replies.

- Yes
-

No

Please feel free to upload a concise document, such as a position paper. The maximum file size is 1MB. *Please note that the uploaded document will be published alongside your response to the questionnaire, which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position.*

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

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