

Thank you Mr. President.

My name is Richard Patterson. I'm the Managing Director of the Sporting Arms and Ammunition Manufacturers' Institute, also known as SAAMI. SAAMI sets standards for the manufacture, transportation and storage of firearms ammunition and components. Our members include the largest and best known sporting firearm and ammunition manufacturers in the United States. Since being formed in 1926 at the request of the US government, we have created standards on every aspect of firearm safety, reliability and quality.

As we all should realize, a firearm is a tool—a very simple tool that dates back to the 12th century. Like any tool, it can be used for great good or great harm. I had the opportunity to be part of the New Zealand seminar on firearm safety this past February. I heard the local people, the Maori, talk about the construction of their wharenui, the house at the center of their social fabric. They talked about the intricate and beautiful carvings inside and referred with respect to “the minds that controlled the hands that guided the tools to create the carvings.”

Just like a chisel—or any other tool—a firearm is guided by the hand, which is controlled by the mind. We cannot change fundamental behaviors—the actions of the mind—by merely focusing on the tools. The human mind in its great capacity will find a way to do what it wants to do. An interesting presentation at the New Zealand seminar reinforced that point. Specifically, the study examined the effect of gun control laws on suicides. It found there was a small reduction in firearm-related suicides, but—and here's the point—the overall suicide rate went unchanged. In other words, the same number of people still killed themselves; they just used a different tool.

Herein lies one of the great challenges of the UN work on this issue. Specifically, how can the UN prevent criminal access to simple tools that have even been illegally manufactured by inmates at maximum-security prisons? A myopic focus on the tool cannot succeed in preventing the willful and illegal misuse of firearms. If there were such a simple and singular solution to the complex problems of crime and violence, the problems would have been solved long ago. Furthermore, any solutions must co-exist within the frameworks of national legal, regulatory, cultural and societal constructs. As such, many of these issues are best handled at the national and regional levels.

There is, however, clearly one issue where a global focus makes sense—specifically marking and tracing of firearms.

We applaud the success of the UN conference on marking and tracing. The United States has an effective system in place that allows rapid and accurate tracing without reliance on a centralized national database and without jeopardizing individual liberty. This ATF administered program—in combination with the FBI National Instant Check System (NICS) which verifies that a purchaser is not prohibited from purchasing a firearm because of age, criminal record or history of mental health disorders—provides a model that promotes effective law enforcement while jealously protecting individual liberty.

The industry supports these measures. In fact the industry has gone one step further with proposals to make the entire firearm tracing system faster and more efficient. The result, called “Access 2000” and sometimes referred to as “eTrace,” provides instant tracing information to law enforcement 24 hours a day, 7 days a week.

One aspect of marking and tracing being discussed in this forum is ammunition. This concept, while well-meaning, is flawed. Originally, the idea was presented as a serialization of each bullet, then marking the bullet and/or case with the lot number. As discussions within this process have correctly pointed out, both ideas are unworkable. In the US alone more than 8 billion rounds of ammunition are produced annually. There simply isn't enough room on the bullet or case to hold a serial number that large—let alone the logistical impossibilities of a commercially viable production program that would ensure every number on every cartridge matched every number on every box. Current mass-production and quality control methods—honed over more than a century of development—would be rendered obsolete overnight. The industry simply could not afford the capital required to build new factories and production processes that would allow this idea to work.

As a result, some have suggested marking the headstamp with lot numbers. They point to a small number of military and national law enforcement customers that require such a custom headstamp as an example. First it's important to know what a lot number is and why it exists in the first place. Lot numbers are a quality control identifier typically put on a box of commercial ammunition. Every manufacturer's lot number has a different meaning but typically includes what day and what machine the ammunition was manufactured on, changes in process, adjustments to the machinery and/or changes in components. Manufacturers keep these numbers coded to prevent competitors from being able to identify production rates, suppliers, efficiencies and other critical proprietary information.

As I mentioned, a small number of military and national law enforcement agencies require a particular number be part of a customized headstamp. It's not a lot number—for one thing not all of the information normally contained in a lot number could physically fit on the headstamp—but rather a custom request made and paid for by large volume customers. Any customer can order a custom headstamp if the order is large enough and the customer is willing to spend the money. This example fails, however, in more broad applications. In the example given, the customer is a single user purchasing an entire lot of ammunition. Sporting ammunition distribution is completely different. Manufacturers sell to distributors and large retailers, distributors sell to smaller retailers, and retailers sell to individuals. A manufacturer can sell ammunition from a single lot to as many as 500 different customers, each of those customers will in turn break down their shipment to smaller quantities and sell to their customers. In the end, small boxes of sporting ammunition—all marked with the same lot number—is in thousands of different hands. This costly exercise would be completely irrelevant as a law enforcement tool.

I want to make this point very clear; economic viability is an obvious prerequisite for any company or organization. However, our opposition to including ammunition in a UN

forum is not about money. The fact is even with such improvements, marking and tracing of ammunition simply doesn't work. This conference would be better served by focusing on other issues that have a potential to make a real difference and not waste time and money on ammunition marking and tracing.

In addition to saving valuable time of this body by pointing out what is technically unworkable, there are other ways SAAMI can help. We understand manufacturing and distribution of sporting firearms and ammunition better than anyone else. We have established good working relationships with US government agencies and members of the international community (including the 15 member-nations of the Commission Internationale Permanente Pour L'Épreuve Des Armes À Feu Portatives or C.I.P.). We are happy to share this information and formula for success...further, we can assist manufacturers in other countries with the establishment of marking, tracing and recordkeeping programs and show them a model of industry/government cooperation that works.

Thank you Mr. President. I hope you will take us up on our offer of assistance and think of us as a technical resource.