

## **Analysis of the report of Mrs. Vicky Ford on the new draft directive on arms**

Although a positive attitude of the “reporter” to defend some of the rights of EU citizens can be seen, unfortunately her compromise approach leads to serious impairments in the current legal situation, which will be clearly at the expense of the rights of EU citizens.

Herein we present an analysis of the subsequent points in the document:

**ad 3.i.** It proposes a ban of firearms converted to blank firing weapons, leaving the possibility of legal possession of firearms produced as blank firing weapons. This is an unnecessary concession as the problem of blank firing weapons’ converting back into firearms exists only on the basis of the Slovak regulations, so the problem is local and so should be settled as one.

Moreover, the introduction of a proposed rule leads to significant impediments of historical reenactment societies, by preventing the use of historical firearms converted to blank firing weapons.

**ad 4.2.i.** This is not a small concession, it is a capitulation, which will lead to defence of the Finland’s position, while in Poland today it will not defend anything.

**ad 4.2.ii.** Only a partial solution that can be used on national level for severe restrictions on access to category A firearms to private institutions.

**ad 4.2.iii.** An entry of an annoying type while having no effect on reducing the efficacy/usefulness of weapons for terrorists.

**ad 4.2.iv.** It seems to have the same effect as leaving the legislation in this area in a present form, yet there is an anxiety that the change might have a negative impact, which is difficult to detect at hoc.

**ad 4.3.i.** A CATASTROPHE! Prohibiting access to firearms using military ammunition will lead to the collapse of the market for hunting and sporting firearms. Such firearm types are popular in the civilian use because of their ballistic characteristics, the cost/quality relation. Moreover, more than half of civilian owned firearms in Poland and most of EU countries, and approximately 75% of newly purchased ones use such ammunition.

**ad 4.3.ii.** It restricts access to the weapons used for hunting and sports. It is the military and uniformed services that “militarise” semi-automatic firearms designed for civilian, and not vice versa. Thus, EVERY firearm newly designed for hunters and sportsmen will be at risk of being delegitimized as soon as uniformed services start to appreciate its qualities.

**ad 4.3.iii.** It will destroy firearms collecting and increase bureaucracy.

**ad 4.3.iv.** Very susceptible to various interpretations, including radical, potentially a very dangerous record.

**ad 4.3.v.** The first part will de facto lead to a ban on any semi-automatic firearms, because mags are often constructed in external companies and virtually any type of firearm can be equipped

with a larger capacity magazine.

**ad 4.3.v.** The second part is illogical and very capacious; if something is perfect for hunting it is good for a fight.

“Higher standards concerning ammunition, training or storage” are unnecessary as there is no causal relationship or even a correlation between a higher standard of storage and reduction in amount of stolen weapons. Concerning ammunition see **ad 4.3.i.** Training on the other hand will not affect the problem, which this new directive is to solve (has nothing to do with illegal trafficking or terrorism).

**ad 5.** This is a defence of museums at the expense of private collections, an unacceptable attack on civil liberties and promotion of state undertakings at the expense of private ones.

**ad 5.iii.** Magazines are not an important part of the firearms from the point of view of the law; they are widely available even for people unrelated to use of firearms. This is another record attacking the law-abiding citizens (malicious acrimonious bureaucratic remark) and having no effect on reducing the possibility of terrorists. Record of a type: “this is not about magazines (or anything else) it's about control” and something that is nicely captures by the term SUBMISSION.

**ad 5.iv.** see **ad 4.3.v.**

**ad 5.2.** Mandatory medical examinations every 5 years, is de facto a record confiscating firearms. The cost of carrying out such mandatory examinations has led to a practical destruction of gas pistol segment of the Polish market, and mass decline in private possession of weapons of this type. ONE OF THE MOST DANGEROUS RECORDS.

**ad 6.** Restricts the fundamental right to dispose with personal property. Such legal status exists in Poland and in practice it forces gun owners who want to sell, to do so well below market value (even for only a few percent).

**ad 7.** This is some sort of an extralegal scandal. On what basis should the seller decide who can buy ammunition and how many? This record in practice destroys the freedom of trade and provides sellers a disproportionate and indelible advantage over buyers.

**ad 8.** More bureaucracy without any impact on the problems that the directive is addressing.

In summary the person who wrote these proposals, does not know anything on the subject, or is a person who, under the guise of defence of the current state wants to destroy the culture of private firearms ownership throughout the EU.

**The analysis was prepared by  
Ad Arma Foundation**