



## The United Nations Firearms Marking System

On December 23rd, 2004, the Government of Canada introduced the new regulations on Firearms Marking. By their own admission, they were intended to comply with the *United Nations Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition, supplementing the United Nations Convention against Transnational Organized Crime and the Inter-American Convention Against the Illicit Manufacturing of and Trafficking in Firearms, Ammunition, Explosives, and Other Related Materials*.

This law, postponed for 11 consecutive years by three consecutive governments, will come into force **June 1, 2017** and its effect on the Canadian firearms industry could be disastrous. This program will require ALL imported guns to be marked with the country and year of import. Canada's marking regulations (**passed into law** but not yet in force) are the following:

### MARKING OF IMPORTED FIREARMS (Bill C-10A Regulations)

**3. (1) Every individual, business or public service agency that imports a firearm shall ensure that the **firearm is marked in accordance with section 4 before the 60th day after its release as defined in subsection 2(1) of the Customs Act or before transferring the firearm, whichever occurs first.****

(2) Subsection (1) does not apply to

(a) a firearm imported by an individual under section 35 or 35.1 of the Act;

(b) a specially imported firearm;

(c) a protected firearm;

(d) a firearm that was initially exported from Canada by an individual or business if the individual or business retained ownership of the firearm while the firearm was outside Canada; or

(e) a firearm that was initially exported from Canada by a public service agency and that was retained by that agency as an agency firearm while the firearm was outside Canada.

### MANNER OF MARKING

**4. (1) The firearm shall be marked by permanently stamping or engraving on the **firearm's frame or receiver** the word "Canada" or the letters "CA" and**

(a) in the case of a manufactured firearm, the name of the manufacturer and the firearm's serial number; and

(b) in the case of an imported firearm, the last two digits of the year of the importation.

(2) The markings shall

(a) be legible;

(b) have a depth of at least 0.076 mm and a height of at least 1.58 mm; and

(c) subject to subsection (3), be visible without the need to disassemble the firearm.

(3) In the case of an imported firearm, the Registrar, on application by the individual, business or public service agency that is importing it, shall grant the applicant an exemption from the requirement set out in paragraph

(2)(c) if

(a) marking the firearm in a place that is visible only by disassembling the firearm is consistent with the current practices of the manufacturer of that model of firearm;

(b) the firearm does not provide a visible space suitable to stamp or engrave the markings;

(c) the firearm is rare;

(d) the firearm is of a value that is unusually high for that type of firearm and that value would be significantly reduced if the markings were visible without disassembly; or  
(e) the firearm is imported by a business that holds a licence for the purpose of using the firearm in respect of motion picture, television, video or theatrical productions or in publishing activities.

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The above appears in Canada's Marking Regulations. The intention of the Canadian Regulations is to put "CA-15" on the frame or receiver of all newly imported guns. It doesn't sound like much, but in truth, its impact on Canadian industry is somewhat different and considerably darker than what appears by a simple reading of the above text. It may spell the end for much of Canada's gun industry.

The first issue is that the marking of firearms imported into the United States has been addressed for a long time in one form or another; imports represent a small portion of their domestic consumption, and several foreign manufacturers such as Beretta, SIG and Glock have built production facilities in the U.S. to obtain a stronger market base. In Canada, this situation does not exist and we have a very small production industry for domestic consumption and precious few imports due to our restrictive legislation and smaller population base. This significantly differs from the practices of the world's largest producer / consumer of firearms.

Canada represents between 1% and 4% of the world market for firearms. The vast majority of our firearms imports are new firearms which the manufacturers have refused to mark especially for Canada, a very small percentage of their world market. Indeed, many of the world's largest manufacturers have already told us that we will have to put the U.N. Marking on ourselves.

### **The next issue is, How do we apply the Marking?**

Canada does not have a large firearms manufacturing industry for domestic consumption, and Canadian importers do not have an existing setup that could be modified for this purpose, since they do no manufacturing. The time and cost to do this would be borne by the importers who would then have to pass these costs on to the Canadian consumer.

The only practical method of adding markings is by Computer Numerically Controlled (CNC) Laser Engraving. Firearms are made out of many different materials with different finishes( case hardened, camouflage film, plating etc.) and only the computerized laser has the versatility to engrave different grades of steel, aluminum, titanium, alloys, brass, case hardening, plated metals and polymer frames/receivers. High grade engraved receivers are another issue entirely.

However, the specialized laser engraving units are expensive, with costs approaching \$100,000. Also, the jigs, fixtures and retainers for each make and model of manufactured firearm will be different from each other, and **can cost as much as \$30,000 each**. There are literally thousands of different models required.

This costly process is also time consuming if attempted in Canada. Each importer would have to prepare a proper "factory area", something they do not have in terms of sufficient space in existing facilities, or the profit margins to move to larger single purpose premises. In addition, specifically trained CNC employees would be needed solely for the purpose of marking imports with "CA 15".

The actual marking process, if the necessary fixtures and laser equipment were available, entails that each firearm be removed from inventory, removed from its packaging, cleaned, disassembled if necessary, placed into a specific type fixture, engraved as required, refinished as needed and re-greased, repackaged and returned to inventory.

All of this must also, of course, be scrupulously paper worked. A time/cost analysis conducted with a major Canadian importer of firearms showed a best time of **20 minutes per firearm** to do these tasks, or some 24 guns

per eight hour shift. Factor this into the hundreds of thousands of firearms imported into Canada every year and the problem is obvious. Major importers will need several skilled full time employees (specifically trained CNC operators) doing nothing but applying the cursed U.N. mark to the guns, with expensive CNC machines, using expensive fixtures for each model of gun, in expensive new premises.

To stay in business, this enormous cost can only be absorbed by being passed on to the consumer, and **the cost of a new firearm in Canada will skyrocket, perhaps more than \$200 per firearm in the first five years**, per CSAAA (Canada's industry organization) estimates. **This is the average cost applicable to any firearm regardless of retail price. It also makes the assumption that the importer can withstand the astronomical set up costs and is still in business.**

This means a new firearm retailing at \$150 will rise to about \$350, while one retailing at \$1,000 will rise to about \$1,200. Based upon recent imports, this could result in a net cost to Canada's firearms industry of approximately \$60 million per year after the set up costs.

As if that isn't enough, how will sellers of these firearms deal with the chronic corrosion problems (the laser burns through the firearm's finish, of course). Marking the guns this way will certainly invalidate the factory warranty, and repair costs will therefore fall upon the Canadian industry. There may even be serious metallurgical issues caused by the application of intense heat to certain materials. Certainly any collector's value will be destroyed and the resale value will be correspondingly reduced.

It is the considered opinion of the CSSA that the Canadian firearms industry cannot survive such a debilitating situation. Recovery would be highly doubtful at best.

The U.N. Marking System cannot be allowed to proceed forward in Canada. The livelihoods of thousands of Canadians and the economic health of a thriving industry depend upon its repeal.

The CSSA is the thin line between the United Nations and the destruction of Canada's firearms industry. Please help us fight this draconian law. Become a CSSA member or make a donation today at [www.cssa-cila.org](http://www.cssa-cila.org)