



Association Européenne de Commerce d'Armes Civiles  
The European Association of the Civil Commerce of Weapons

**Director-General Mr Matthias RUETE**  
**DG HOME - Directorate-General for Migration and Home Affairs**  
**Rue de Luxembourg 46**  
**B-1049 Brussels**

**Director-General Ms Lowri EWANS**  
**DG GROWTH - Directorate-General for Internal Market, Industry,**  
**Entrepreneurship and SMEs**  
**Avenue d'Auderghem 45**  
**B-1049 Brussels**

Brussels, 25th November 2015

**RE: Commission's proposal to amend the Firearms Directive**

Dear Ms Evans,  
Dear Mr Ruete,

I am writing to you in my capacity as President of the **European Association of the Civil Commerce of Weapons (AECAC)**<sup>1</sup> with regard to the Commission's proposal to amend the Firearms Directive.

The Commission is putting forward a number of restrictions concerning the legal ownership of **civil firearms**, including the ban of some of them. Even more

---

<sup>1</sup> AECAC was founded in 1992 and it is formed from numerous national associations representing the interests of firearm and hunting small- and medium-sized enterprises from all over Europe. Being the only representative at a European level of the **firearm retailers**, AECAC has already stated its satisfaction with the current text and functioning of the Directive 91/477/EEC, as amended by Directive 2008/51/EC.

**Rue F. Pelletier 82, 1030 Bruxelles**

*Secrétariat:*

Plaza Bonanova 4, 1<sup>o</sup>-1<sup>a</sup> 08022 Barcelona, Spain. Tel. +34 93 205 42 31 Fax: +34 93 418 95 35

e-mail: [v.fabregat@fabregat-perulles-sales.com](mailto:v.fabregat@fabregat-perulles-sales.com)

[www.aecac.eu](http://www.aecac.eu)



Association Européenne de Commerce d'Armes Civiles  
The European Association of the Civil Commerce of Weapons

worrying, the Commission presents its proposal as an essential element of the fight against trafficking of firearms and terrorism.

Since 2013, the Commission has been trying, without success, to establish a link between legal and illegal firearms, for which it has even resorted to the unacceptable misrepresentation and alteration of data<sup>2</sup>. However, recent tragic terrorist attacks have finally provided the Commission with the political opportunity to present a legislative proposal to review the Firearms Directive.

My association is mainly made up of SMEs, subject to the strictest controls. In this respect, it is difficult to reconcile the tabling of your proposal (which has not even been accompanied by an impact assessment) with the 'Think Small First' principle and the mission statement of DG GROW.

The estimated **10 million legal owners** of civil firearms (mostly hunters and sport-shooters) and thousands of legal firearms dealers across the EU are still shocked by the Commission's initiative. They are asking themselves what they have done wrong and why they should pay for enforcement failures and for hideous acts committed by criminals. Those millions of law-abiding citizens are however starting to understand that they are just the collateral damage of somebody's political agenda.

The current rules under the Firearms Directive are already very strict. Legislation, however, is useless without enforcement. The Commission, as Guardian of EU law, must ensure that Member States transpose correctly the Directive. For instance, the Directive mandates that deactivated firearms be rendered permanently unfit for use, ensuring that all its essential parts have been rendered permanently inoperable and incapable of removal, replacement or a modification that would permit the firearm to be reactivated in any way. The Directive also

---

2

[http://face.eu/sites/default/files/attachments/face\\_response\\_to\\_ec\\_communication\\_on\\_firearms\\_10\\_02\\_2014\\_formatted.pdf](http://face.eu/sites/default/files/attachments/face_response_to_ec_communication_on_firearms_10_02_2014_formatted.pdf)

***Rue F. Pelletier 82, 1030 Bruxelles***

*Secrétariat:*

*Plaza Bonanova 4, 1<sup>o</sup>-1<sup>a</sup> 08022 Barcelona, Spain. Tel. +34 93 205 42 31 Fax: +34 93 418 95 35*

*e-mail: [v.fabregat@fabregat-perulles-sales.com](mailto:v.fabregat@fabregat-perulles-sales.com)*

*[www.aecac.eu](http://www.aecac.eu)*



Association Européenne de Commerce d'Armes Civiles  
The European Association of the Civil Commerce of Weapons

lays down rules to prevent blank firing weapons from being converted into firearms. Given that the Commission argues that problems in these specific areas are part of the justification to reopen the Directive, it is legitimate to ask the Commission what it has done in the last years to ensure that national legislations have complied with the current obligations under the Directive.

It is utterly wrong to believe that by increasingly restricting legal trade in and use of hunting and sporting firearms illegal trafficking in firearms will be reduced. Such restrictions will not only impose unjustified and disproportionate restrictions on legal users but they will also **divert public resources from the real threats**, such as tackling the current black market and the trafficking in firearms coming from post-conflict areas.

My association calls on the Commission to reconsider its current strategy, which will only exacerbate the **disaffection of millions of citizens towards the EU** and will not solve the real problems. The Commission should instead enforce the current rules on legal firearms and coordinate the actions and efforts of the Member States in the fight against illegal activities.

Yours sincerely,

Yves GOLLETY  
President

***Rue F. Pelletier 82, 1030 Bruxelles***

*Secrétariat:*

*Plaza Bonanova 4, 1<sup>o</sup>-1<sup>a</sup> 08022 Barcelona, Spain. Tel. +34 93 205 42 31 Fax: +34 93 418 95 35*

*e-mail: [v.fabregat@fabregat-perulles-sales.com](mailto:v.fabregat@fabregat-perulles-sales.com)*

*[www.aecac.eu](http://www.aecac.eu)*