

Thank you Mr. President:

My name is Rob Talley and I serve as the Executive Director of the FAIR Trade Group, an organization representing the interests of businesses involved in the legal import and export of firearms across international boundaries. It is very important that we clarify at the outset that our membership supports efforts to minimize global violence and restrict the illicit trade in small arms and light weapons. However, we are concerned that the well-meaning efforts to combat illicit trade will have an unintended consequence of negatively impacting trade servicing the legitimate personal and sporting use of firearms.

One of our primary concerns is the continued failure to clearly define small arms and light weapons. A single definition will be a necessary predicate to harmonizing international transactions. Failure to develop a single definition now will only heighten confusion later. It is clear that the primary issue of concern in areas of conflict and around the world is the illicit trafficking in fully automatic firearms and more powerful armaments. We believe it is appropriate for this body to focus on these armaments as part of this initiative.

We are also concerned that laudable efforts to control illicit transactions not unduly burden the legitimate commercial trade. Even in the United States, our regulatory initiatives provide examples of how not to develop international regulations. In the US, the cost to file for a license to export a single rifle is the same as the cost to acquire a license to export a military jet aircraft. In fact, in order to ship \$100 worth of firearms parts like springs or butt stocks from the US to another country we must pay \$250 for a permit. This is an example of how not to structure a new international regime. Instead, any regime must be sufficiently transparent and workable to allow for legitimate business transactions in firearms, parts and ammunition to continue.

Finally, it is misguided to place such a significant emphasis on the elimination of trade in surplus or obsolete semiautomatic military firearms. Many of these firearms have significant collectable value that results in part from their obsolescence as significant military assets. These are generally not the kinds of firearms that are surfacing in areas of conflict. These firearms are in function, at best, the equivalent to modern day hunting rifles and to continue to focus on banning transactions in these goods fails to focus limited resources on addressing legitimate illicit transactions to areas of conflict.