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The Honourable John Baird, PC, MP  
Minister of Foreign Affairs  
House of Commons  
Ottawa, Ontario K1A 0A6

26 January 2012

Dear Minister:

I am writing as a member of the International Small Arms Control Standards (ISACS) Expert Reference Group (ERG) to alert you to serious problems in this United Nations initiative.

ISACS was created in 2008 within CASA (Coordinating Action in Small Arms) to provide comprehensive guidance to the more than 20 UN bodies active in policy development related to the illegitimate use of small arms and light weapons (SALW). Despite having worthwhile goals, ISACS has abandoned its commitment to follow universally accepted procedures for setting standards. Special interest groups have captured the process, with the result that decision-making has degenerated to such an extent that personal opinion substitutes for factual arguments. ISACS has shifted its focus from “curbing the uncontrolled proliferation and misuse of small arms and light weapons” to advocating measures whose purpose would seem to be, and whose effect certainly would be, disarming responsible citizens. This approach threatens to undermine democratic governments and increase the power of authoritarian regimes as well as exacerbating the intrinsic problems of the Arms Trade Treaty.

After verifying my claims, I urge the government to reduce or eliminate funding for ISACS. Canada is listed as one of the principal contributors to the ISACS initiative (<http://www.un-casa-isacs.org/isacs/Welcome.html>).

Before elaborating upon my critique of ISACS, I would like to thank you very much for encouraging the stand taken by the Canadian delegation to the National Committee on Small Arms and Light Weapons (SALWs) at PrepCom3 in New York in July 2011. It was refreshing to see Canada show strong and positive leadership for a change. Under previous administrations, it often appeared that one of the primary goals of DFAIT at the UN was to embarrass the United States.

It is banal to claim that a UN initiative is utopian or squandering money. ISACS is no exception in this regard, but it has still more grievous failings. When ISACS was

launched, the CASA (Coordinating Action on Small Arms) directorate made it clear that the ISACS process would follow ISO (International Organization for Standardization) guidelines for setting international standards, but ISACS has failed to honour this commitment. To quote from the ISACS stated goals:

This document provides practical guidance on the implementation of commitments related to national controls over the access of civilians to small arms and light weapons that are contained in United Nations multilateral instruments related to small arms and light weapons control.

This document is meant to be of use to regulatory and licensing authorities of States that are seeking guidance on drafting laws, regulations and administrative procedures to control civilian access to small arms and light weapons. (ISACS 03.30:2011(E) – draft 3.0, p 1)

The ISO defines a standard as a “...document established by consensus and approved by a recognized body, that provides for common and repeated use, rules, guidelines or characteristics for activities or their results, aimed at the achievement of the optimum degree of order in a given context”  
( [http://www.iso.org/iso/standards\\_development/processes\\_and\\_procedures.htm](http://www.iso.org/iso/standards_development/processes_and_procedures.htm) ).

Unfortunately, this guidance has too often been abandoned by CASA in favor of deference to special interest groups and personal opinions. Under ISACS, none of the ISO criteria for standards setting are being met. Instead, modules appear to be written for certain favoured NGOs (Non-Government Organizations) and are submitted for comments by others without providing adequate opportunity for internal discussion, careful analysis or review. Expert comments and documented factual critiques are routinely ignored.

To be fair, ISACS has been able to abide by ISO standards setting procedures in some cases. An admirable degree of consensus has been achieved with what are essentially technical modules, e.g., 03.20 *National Controls over the International Transfer of SALW*, 05.20 *Stockpile management*, and 05.50 *Destruction: Weapons*.

All too often however, modules are being written by authors with strong links to NGOs that believe more guns in civilian hands equals more violence and fewer guns equal less violence. These underlying assumptions have no basis in fact (Kates and Mauser 2007; Kleck 1997; McPhedran et al, 2010; Mauser 2007; Miron 2001; Wellford et al 2004). The authors of the ISACS modules and CASA have been challenged to produce factual support for these assumptions, but they have simply ignored the challenge in pursuit of their rigid and pre-conceived ideas. The result has been that recommendations are utopian and reflect faddish concerns among special interest groups.

It is a dangerous canard to claim that civilian access to firearms is an important determinant of violence. Over the past few decades, academic researchers, including political scientists and economists, have studied a wide variety of factors that

theoretically may contribute to intra-national and inter-national violent conflict. A few of the more important factors are: lack of economic freedom, income disparity, poverty, slow economic growth, organized crime, non-democratic government, governmental corruption, low adult-education levels, drug trafficking, and a history of violent ethnic conflict. Scholars have empirically evaluated these variables in a wide variety of studies, but little evidence has emerged that would suggest that firearms stock or civilian firearm ownership are important contributory factors (Azar and Burton, 1986; Greenwood 2001; Rummel, 1981; United Nations, 2007; Zartman, 2000).

The impracticable nature of the ISACS proposals rules them out as standards as well as best-practice guidelines, codes of conduct, or model regulations. ISACS modules are merely mishmashes of feel-good and unworkable suggestions. If ISACS proposals were to be adopted by the UN as either standards or best-practice guidelines, it would exacerbate the intrinsic problems of the Arms Trade Treaty and would in all likelihood prove to be counterproductive. (The attached module on civilian firearms ownership is characteristic). If adopted, the ISACS proposals would at best be expensive to operate (an unattractive feature given the current world economic circumstances) and would not be cost-effective. Nor would they be affordable by those countries that have not yet developed their own firearms legislation. Many countries, such as South Africa, still lack the technical infrastructure to adequately maintain regulatory systems of the proposed complexity.

The procedures proposed in the most recent module on civilian firearms illustrate the utopian and excessively bureaucratic approach favoured by ISACS (see attached module 03.30, draft 3.0). I accept the principle that governments can legitimately regulate civilian firearms, but the restraints proposed in this module are disproportionate and impracticable. Despite pledging that it recognizes the legitimacy of civilian firearm ownership, the regulatory schemes proposed in this module are outrageously bureaucratic, imposing a bewildering array of arbitrary, expensive and unwieldy restrictions upon responsible civilians who wish to own and use (or legitimately deal in) firearms. The proposals are so intricate that, taken as a whole, they suggest a belief that civilian firearms ownership itself is illegitimate and dangerous. There is a considerable body of peer-reviewed research by criminologists and economists investigating the effectiveness of restricting civilian firearms ownership. None of these studies have found that legal restrictions on civilian firearms ownership brought down murder, suicide or aggravated assault rates (Baker and McPhedran 2006; Hahn et al 2003; Kleck and Patterson 1993; McPhedran et al 2010; Thorp 1997; Welford et al 2004). Nor can the Canadian firearms restrictions be shown to have influenced criminal violence rates (Langmann in press; Mauser 2011; Mauser and Holmes 1992; Mauser and Maki 2003).

If adopted, the ISACS proposals would undermine democratic governments and provide a tool to bolster authoritarian regimes. Authoritarian regimes have murdered more people during the 20th century between wars than were either killed during wars or murdered by criminals and terrorists (Rummel, 1981, 1998). Indeed, some scholars have even argued that civilian firearm ownership might be important resisting genocide (Halbrook 2000; Kopel 2003, 2006). In some ways the focus on civilian firearms should not be surprising,

considering the authors of the modules are from, or have links to, disarmament and antigun NGOs. Evidence of this comes from the last workshop during which Rebecca Peters, at the time the Executive Director of the International Action Network on Small Arms (IANSA), an organization claiming to be working towards eliminating gun violence, said, “We have been working directly with the authors of the modules behind the scenes.” As a result, the modules suffer from a myopic focus on gun violence, without any regard for the potential unintended consequences of ISACS recommendations. The extensive use of IEDs (improvised explosive devices) in Iraq and Afghanistan illustrate the ease with which terrorists can deploy alternative methods of violence, and the prominent role of machetes in the Rwanda massacres demonstrate that horrific violence is not restricted to firearm misuse. Focusing exclusively upon gun violence ignores ERG (Expert Reference Group) input that any system must measure total social violence to ensure society is truly better off from implementation of the ISACS proposals.

The rationale given by the authors and CASA for ignoring this, and other ERG input that does not support their singular and unsubstantiated assumptions—is often trivial and is certainly not in keeping with an objective standards-setting process. An example of this can be found in the reaction to ERG input by the author of the ISACS module on *Children, Youth and SALW*. While several commentators documented the tangible social benefits that can be gained from organized youth target shooting programs, including presentation of surveys and other documentation that show young people who engage in such programs have improved grades in school and better focus and discipline in their lives, the author ignored all related references from the draft module because “During my discussions with UNICEF (Judy Myers in Geneva) it was clear that UNICEF could not support messages about guns being a recreational and useful thing for children and youth, together with the issue of lawful use etc. The same goes for safe handling messages dealing with arms. Therefore I have not included the feedback that have (sic) covered these issues.”

The ISACS process ignores peer-reviewed academic research by world-renowned criminologists that finds that people who have owned firearms the longest have the lowest rate of criminal violence (Kleck 1991; Kleck 1997). Exceptionally few hunters or target shooters are involved in criminal violence despite their lifelong use of firearms (Mauser 2011). This is not consistent with the public health approach that treats firearms as a “disease vector.” A dramatic example of the positive social value of firearms is the Rochester Study that found that adolescents who had been taught about firearms by their parents were less likely to become involved in criminal activities than their peers who had had no contact at all with firearms. These adolescents are not Olympic shooters; they are merely children of blue-collar hunters. Adolescents who had been taught about firearms by their peers were more likely to become involved in criminal activities (Bjerregaard, B., and Lizotte, A.J. 1995; Huizinga, 1994; Lizotte, A.J., Tesoriero, J., Thornberry, T., and Krohn, M.D. 1994).

The justification given for rejecting ERG recommendations is that ISACS must respect previous commitments that the UN has made regarding SALW. In my view, these should

not be treated as immutable but should be reviewed and evaluated as part of any major UN initiative on SALW.

In conclusion, ISACS modules cannot be considered to be international standards, best-practice guidelines, nor model regulations. I find it difficult to countenance that the Canadian government would support an international effort by the UN that effectively is designed to disarm, or at least strongly to discourage, legal arms possession, by responsible citizens in other countries while simultaneously asserting that it supports legitimate firearms ownership in Canada. I urge the government to reduce or eliminate funding for ISACS.

Respectfully yours,

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Attachments

*National controls over the access of civilians to small arms and light weapons*, ISACS module 03.30, draft 3.0

CASA announcement that Canada provided support to ISACS,  
<http://www.un-casa-isacs.org/isacs/Welcome.html>

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