



SPORTING ARMS AND AMMUNITION MANUFACTURERS' INSTITUTE, INC.

SINCE 1926

**UN Preparatory Committee Meeting on the Review Conference on the Programme of Action on the Illicit Trade in Small Arms and Light Weapons in All its Aspects**

New York, 22 March, 2012

Statement by Richard Patterson, Managing Director  
Sporting Arms and Ammunition Manufacturers' Institute, Inc.

Thank you Madame Chair, for the opportunity to speak today. My name is Richard Patterson and I'm the Managing Director of the Sporting Arms and Ammunition Manufacturers' Institute, also known by our acronym "SAAMI." Since 1926 we have set safety and reliability standards for the design, manufacture, transportation, storage and use of firearms, ammunition and ammunition components. As an accredited standards-setting organization we joined the UN Coordinating Action on Small Arms project to create International Small Arms Control Standards (ISACS). We understand and respect the rigorous process to create guidance which, when applied in a given situation, will result in the intended outcome. We believe our decades of experience in establishing standards and our unique position and standing in our industry would make a positive impact on the validity of the resulting ISACS.

Sadly, SAAMI is forced to conclude that ISACS has and will continue to fail in the creation of clear and effective guidance because of significant breaches in standards-setting protocols, and dogmatic adherence to unsubstantiated assumptions, agendas, and biases.

By one count 65% of all input from the Expert Reference Group was ignored. Contrary opinions, supported by studies, were summarily dismissed with as little justification as "we don't like the idea." Dissenting arguments, reinforced by documented facts and studies, were rejected by claiming the supporting data was too local in their focus for a global application such as ISACS—while local anecdotes were used to justify global assertions. The only commonality to implementation of these highly-flexible rules of inclusion was their support for more gun control.

Where input was acknowledged, and the text changed, the change was often made by simply replacing a “shall” with a “should,” without rescinding the unjustified or false premise upon which the original stipulation was based.

The biased and unjustified inflammatory rhetoric in the ISACS drafts was particularly revealing. One author wrote that “in some countries, especially the US, dealers routinely look the other way when selling weapons to someone who by all accounts presents a risk.” The US does have the gold standard for firearms regulation. The rules are clear, and dealers are regularly inspected for compliance. According to records kept by the US Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), less than 0.04% of dealers are prosecuted for any criminal offense, let alone arms trafficking.

These are not the hallmarks of a fair and open process designed to produce effective standards. This process can’t result in good guidance. Regrettably, the ISACS have the characteristics of opinion pieces passing under the facade of being carefully-considered, broadly-recommended model legislation.

I truly wish I could stand before this body and support ISACS as effective, objective, measurable and fact-based standards. I can’t. Because ISACS isn’t what it claims to be. Sadly, ISACS remains a promise unfulfilled and should not be part of the UN nor the UN Program of Action.

Thank you.

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