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The Sporting Arms and Ammunition Manufacturers' Institute (SAAMI) appreciates the opportunity to comment on the implementation of the Canadian regulations for marking on import. Since its founding in 1926 at the request of the US government, SAAMI has created the standards for safety and reliability in the design, manufacture, transportation, storage and use of firearms, ammunition and components. We have read the Canadian Sporting Arms and Ammunition Association's July 12, 2007 paper on the subject and find it to understate the problems with the proposed marking regulation. Based on our technical knowledge and practical experience, we see several significant problems with implementation of the Canadian Firearms Marking Regulations (Sections 3 and 4). These problems fall into four broad categories: technical challenges, aesthetic challenges, logistical challenges, and actual benefits.

Technical challenges

When a sporting firearm is manufactured, its destination is unknown. This means that markings or a specific destination (such as "Canada")—must be put on after heat treatment and final finishing of the component part. This creates a quality deficiency, but even more significant, a potential safety issue. There are only a limited number of options that would allow the creation of the required mark; roll stamping, die stamping, engraving, laser engraving, multiple pin impingement and electro-chemical etching. Of these, neither electro-chemical etching nor multiple pin impingement would make a mark deep enough to meet the requirements of the regulation.

Engraving is a physical process of removing metal to leave a mark. The traditional hand engraving is slow, imprecise, labor intensive and expensive. Laser engraving uses extreme heat to burn away metal, leaving a mark. Theoretically this is a possible technique to comply with the regulation, but making a mark of sufficient depth would require a YAG (Yttrium, Aluminum, Garnet) 2nd generation diode laser, with an initial cost of \$50,000. In addition to this option being cost-prohibitive, the heat generated would both destroy the finish surrounding the actual mark and would weaken the heat treating of the receiver and could create a potential safety hazard.

There are two forms of stamping, roll stamping and die stamping. Roll stamping is when a pre-made die with a curved face is rolled, under pressure, across the surface of the part to be marked. The raised features along the face of the roll die are then transferred as an imprint. Die stamping is a similar process, but the die has a flat surface, rather than curved. The flat die is placed in position and pressure is applied to transfer the raised features of the die to as an imprint in the part to be marked. The die stamp is less expensive and easier to use, but requires more pressure to make a mark. The roll die

requires computer-driven equipment but uses slightly less force to make a similar imprint, since the rolling action concentrates pressure on a smaller area.

Stamping is the most feasible way to make the required marks. However, stamping—using either a roll or a die—has several significant shortcomings. The pressure required to make a mark of sufficient depth to comply with the regulation (which is greatly increased after the part is heat treated—as would be the case with firearms coming into Canada) would cause warping and cracking of the receiver. It would also cause noticeable cosmetic damage to the finish. A custom fixture would need to be created for each model that would help to support the receiver and minimize potential damage from warping or cracking. Even with the fixture, there would be a failure rate and firearms would be destroyed by the process.

Aesthetic Challenges

A number of Canadian customers are collectors of firearms that are historically accurate reproductions or are firearm enthusiasts. For example, there are many customers who participate in cowboy action shooting with six-shooters, lever guns and double barrels or who collect U.S. Civil War, World War I or World War II reproduction pistols. These firearms are purchased for their precision and accurate detail and their role in history. They are crafted for their artistry and sheer physical beauty. While there is an exemption under Section 4 of the Canadian Firearms Marking Regulations for rare firearms or those of “unusually high” value, there are a number of historical replicas that are made in production quantities that are neither considered rare nor sold at an unusually high price. However, these markings would create an anachronism and adversely affect the historical accuracy of these firearms.

Logistical Challenges

Compliance with the regulations represents a substantial burden in terms of resources, capital costs, and technical challenges. The logistics of application of the required mark requires many steps; segmentation of the firearms, acquisition of the equipment and set-up, devotion of floor space to the process, out of line sequence in retrieval and shipping, unpacking the firearm, identification of the correct serial number to the label on the box, removal of the stock from the firearm, placing the firearm in a fixture—alignment issues, removal of rust inhibitor applied to the local area of mark application, applying the mark, cosmetic repair, application of rust inhibitor to effected area, reinstalling the stock, repacking of the firearm in plastic and paper rust inhibiting materials, placing the firearm back in the box, maintaining the same bolt with each individual rifle if applicable, and confirmation that all packing literature is present, creation—and application—of a new label to the box while satisfying the necessity of relationship of box to firearm, stacking the firearms boxes onto pallets, and scanning into the data base the appropriate designation of marking signifying completion of the process as set forth on the new label, and finally, re- wrapping of filled pallets.

Of perhaps greater concern to the manufacturer and/or importer is the notion that once a firearm is marked in compliance with the Canadian regulations, there is no possibility that would allow for re-importing the firearm into the United States or to another country. There are many occasions when manufacturers and/or importers may find it desirable to realign inventory to match demand in a world market. Marking the firearm for import into Canada results in the firearm being permanently consigned to Canada.

Another concern is importing a firearm into Canada toward the end of the year (say, in November or December). There is no guarantee (because the process depends on U.S. State Department and Canadian government approval) that the product will actually ship as intended. This means that guns marked in that year might be mis-marked if they, in fact, ship in January or February. Such mis-marking could cause confusion and error in the tracing process.

Actual benefits

The markings add nothing to what the Canadian government can already determine about the origin of a firearm by doing a simple trace. A manufacturer's name and a unique serial number are all that's required to perform a rapid and effective trace. This information is already required on every firearm and is already available through current Canadian import records first (regardless of the existence of the new stamp). If for some reason these records cannot be found, a process is in place for the Canadian government to contact US Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and ATF will get the information directly from the manufacturer within 24 hours (Note: US law prohibits manufacturers from providing trace information to any organization except ATF).

Conclusion

The new regulation is irrelevant as a law enforcement tool—and may even create additional confusion that would hamper law enforcement efforts. The information required for rapid and effective law enforcement is already available on every firearm—and being used. This new regulation adds expense in time, handling, and additional procedures. It also creates an anachronism for historical replicas. There is also a cost in terms of product losses from damage. The re-finishing will not be as perfect as the factory-applied finishes, meaning Canadian customers receive a product of lesser quality than customers in the rest of the world market.

For these reasons we believe the regulation—while well-intentioned—offers no improvement to the existing system. Worse, it creates many negative unintended consequences and should therefore be eliminated.



SPORTING ARMS AND AMMUNITION MANUFACTURERS' INSTITUTE, INC.

Since 1926

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The Sporting Arms and Ammunition Manufacturers' Institute (SAAMI) is an association of the nation's leading manufacturers of firearms, ammunition and components. SAAMI was founded in 1926 at the request of the federal government and tasked with:

- Creating and publishing industry standards for safety, interchangeability, reliability and quality
- Coordinating technical data
- Promoting safe and responsible firearms use

The work at SAAMI is accomplished by its committees. Technical excellence is always our goal and safety is always the prerequisite. SAAMI supports science-based solutions to the many issues related to firearms, ammunition and components.

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