Mr. Chairman, my name is Mauro Silvis, and I am the General Director of the Italian National Association of Civilian and Sporting Firearms and Ammunition Manufacturers (ANPAM), Secretary-General of both the Institut Européen des Armes de Chasse et de Sport (IEACS) and the Association of European Manufacturers of Sporting Ammunition (AFEMS).

Founded in 1980, ANPAM is regarded by institutions as the main spokesperson for the entire Italian firearms and ammunition industry. At the European level, ANPAM directly, or through the European Associations, provides technical expertise to the European Commission’s DGs to review the EU legislation.

Since 2014, ANPAM has the status of NGO within the UN ECOSOC and is also member of MOSAIC (Expert Reference Group for the Modular Small-arms-control Implementation Compendium).

Mr. Chairman, an average 80% of the production of the Italian, but also of the European, sporting firearms and ammunition is transferred within Europe and exported to North America. As highlighted on many occasions, we think that talking about small arms without taking into consideration the difference between military and civilian could be problematic.

The topic of transshipment and retransfer of weapons could create concerns if applied also to civilian items that are mainly used for recreational activities and are destined to dynamic and open markets. Today, the legislation in place in the EU provides already a clear picture of the full life cycle of civilian products.

The conversion of replica, blank firing or toy guns, is a matter that EU faced years ago, when it was recognized that a legislative gap was allowing these converted items to enter the illicit circuit. We support the sharing of regional experiences and the creation of best practices to prevent potential problems that could emerge in other countries.

For years, the European industry has addressed the issue of the marking of polymers by applying a metal tag merged into the polymer in a way that its removal causes the breaking of the essential part and making the firearm unusable. Today, many manufacturers have
developed also other techniques, creating a window on the polymer where it is possible to mark the metallic part of the firearm.

On the implications of new technologies, ANPAM would like to express its concerns on **biometrics**. The use of this kind of technology applied to SALW is being debated for years, however there are still too many uncertainties on the reliability of these mechanisms.

Finally, on the **marking of small caliber ammunition**, ANPAM and the European civilian industry attended the 1\textsuperscript{st} substantive session of the OEWG on Conventional Ammunition and submitted a position paper [available for download on the OEWG website](#). Also, on this issue we see a lack of distinction between military and civilian ammunition, which follow two completely different production processes. All technical matters are well explained on the AFEMS position paper. The small arms civilian calibers are over 400 and the most commonly used cannot be easily marked. Furthermore, the establishment of any binding legal framework enabling the tracing of ammunition would not be successful if all actors do not follow the international treaties.

In this specific context, ANPAM believes it would be much more effective to assist actively and cooperate with the national or regional authorities that have diversion problems to develop projects to keep track of military/law enforcement ammunition instead of promoting initiatives that in many States are not seen as an issue.

The involvement of the industry is key to address all these issues with real technical experts and avoid security problems. ANPAM, and the European industry, will continue to actively participate to the UN meetings and regional discussions and stand ready to support the institutions with the proposal of reasonable and workable solutions.

Thank you.