

**World Forum on the Future of
Sport Shooting Activities**

**Draft Report of the
Informal Workshop on**

**“Firearms Marking:
Model Standards and
Common Serial Number Codes”**

22-24 June 2000

Grand Hotel Smeraldo Beach

Baia Sardinia (Olbia), Island of Sardinia, Italy

1. Executive Summary

The informal workshop “**Firearms Marking: Model Standards and Common Serial Number Codes**” was held on the island of Sardinia, Italy, 22-24 June, 2000. The meeting was hosted by the World Forum on the Future of Sport Shooting Activities (WFSA). Participants were from governments, intergovernmental organizations, non-governmental organizations, the United Nations and the firearms industry.

Firearms marking has been discussed as part of several international firearms regulation efforts. Model standards for marking, and a possible system of serial number codes for manufacturer and place of manufacture were considered by the Workshop.

Conclusions on codes were deferred, but the informal Workshop made the following recommendations on firearms marking:

Recommendation 1 - Standard for Firearms Marking

Each manufacturer shall mark identifying information upon the firearm in such a manner as the mark may be recoverable.

Recommendation 2 – Duplicate Markings

Each manufacturer shall establish control procedures to avoid duplicate (identical) marks on the firearms it produces.

Recommendation 3 – Records Retention

Each manufacturer shall establish procedures whereby records of what markings were applied to what firearms are kept for at least ten years.

Recommendation 4 – Tracing Requests

Each manufacturer shall establish procedures whereby any request for tracing information from an appropriate law enforcement agency is responded to as soon as possible, but not later than within 72 hours of receipt of the request.

Recommendation 5– New Technologies and Information Sharing

An appropriate mechanism shall be established to–

- A. Periodically evaluate new firearms marking technologies and make recommendations regarding such technologies.**
- B. Communicate the model standards on firearms marking to relevant government bodies and members of the firearms industry.**
- C. Consult on and periodically review the model firearms marking standards, and if necessary, recommend amendments to such standards.**

2. Description of Workshop

2.1 Background and Purpose

Firearms marking has been a frequent topic of discussion in the various regional and international efforts on small arms and firearms. These efforts include the proposed Firearms Protocol¹ and the 2001 international conference on the “Illicit Trade in Small Arms and Light Weapons in All Its Aspects.”²

The Workshop built upon the prior efforts of both the international community and the firearms industry on this topic. Industry efforts were first outlined at the Swiss “**Workshop on Small Arms,**” 18-20 February 1999, Geneva, in a paper entitled, “**Marking Firearms: A Contribution From The Manufacturing Community.**” A WFSA Firearms Marking Working Group, was established to offer the industry’s insight and experience on the matter. The WFSA also participated in two Swiss workshops; “**Workshop on Industrial Aspects of Limiting Proliferation of Small Arms and Light Weapons,**” 28-30 June 1999, Baden and “**Workshop on Small Arms Monitoring and Control,**” 22-23 November 1999, Geneva. The WFSA made a presentation to the European Atlantic Partnership Council (EAPC) workshop on small arms in Brussels, Belgium on March 20-21, 2000 and WFSA representatives attended a workshop on small arms sponsored by the Organization for Security and Cooperation in Europe (OSCE) in Vienna, Austria from April 3-5, 2000. Other workshops were held in Tokyo, Japan and other venues.

Further, the WFSA hosted an informal workshop in Brescia, Italy, 30 September - 1 October 1999 entitled, “**Technical and Manufacturing Aspects of Firearms Marking in the Context of UN Regulation Efforts.**” As a result of that Workshop, the WFSA published a “**Report on Firearms Community Recommendations Regarding Firearms Marking Issues,**” in January of this year.³

Several themes seem to have emerged from all of these efforts:

- All firearms should be marked with name of manufacturer and place of manufacture.
- There should be some model standards on how firearms should be marked..
- Unique serial numbers should be considered.

¹ UN Ad Hoc Committee on the Elaboration of a Convention Against Transnational Organized Crime. “Revised draft Protocol Against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition, supplementing the United Nations Convention Against Transnational Organized Crime.” Vienna, Austria: 5 May 2000, A/AC.254/4/Add.2/Rev.5.

² UN General Assembly Resolution 54/54 V, of 15 December 1999.

³ Meetings were also held in Washington D.C., September 8, 1999 and in London, November 8, 1999. These recommendations were finalized at the latter gathering. Firearms manufacturers which participated in the two meetings included: Beretta (Italy), Glock (Austria), Heckler & Koch (Germany), Manroy Engineering (UK), Mossberg (US), Para-Ordnance (Canada), Pedersoli (Italy), Remington (US), Steyr Mannlicher (Austria), Sturm-Ruger (US) and Taurus (Brazil). Representatives of the "Permanent International Commission for Small Arms Testing," or CIP, attended both the Brescia and London meetings.

- There needs to be industry involvement.

These themes created the context within which the Workshop was held.

2.2 Participants

The meeting was attended by representatives from governments, intergovernmental organizations, non-governmental organizations, the United Nations and the firearms industry.

3. Proceedings

3.1 Welcome, Selection of Chairman and Outline of the Workshop

An informal dinner was held on the evening of 22 June. The formal proceedings of the Workshop were opened on the morning of 23 June. The welcome address was delivered by Dr. Carlo Peroni, President of the WFSA. Mr. C. Edward Rowe, of Sturm-Ruger (USA) was selected as Chairman of the Workshop. Mr. Rowe outlined how the workshop would be conducted.

3.2 Presentations

Mr. Thomas L. Mason, Executive Secretary of the WFSA, reviewed current international efforts at regulating small arms and firearms. He also reviewed the work which has been done on marking in other fora.

A presentation was made by the Swiss delegate. He noted the difference between the Firearms Protocol process in Vienna and the efforts for the 2001 Conference. The delegate also discussed a Swiss-French proposal on marking entitled "Food-for-Thought-Paper."⁴ He outlined three main elements of the Swiss-French proposal: a) markings; b) record keeping; and c) tracing.

The delegate from the United Kingdom gave several illustrations of the usefulness of firearms marking in the tracing of firearms.

A delegate from the United States discussed some of the proposed regulations on marking being promulgated by the Bureau of Alcohol, Tobacco and Firearms. Another US delegate described some of the basic marking requirements found in US law.

One of the Canadian delegates discussed some of the specifics of the Firearms Protocol in relation to firearms marking.

⁴ UN General Assembly, Preparatory Committee for the United Nations Conference on the Illicit Trade in Small Arms..."Note verbale dated 1 March 2000 from the Permanent Mission of France..." New York: 17 March 2000, A/CONF.192/PC/PC/7.

Comments were made by the delegate from the OSCE on their efforts regarding small arms and light weapons. He hoped that duplicate efforts could be avoided.

A substantial presentation was made by a UN official on the 2001 Conference. The delegate made comments on the purpose of the Conference and how the industry could relate to the process.

Summarizing comments were made by the Chairman of the UN Ad Hoc Committee. He discussed the Firearms Protocol process and the 2001 Conference.

3.3 Discussion and Recommendations on Model Standards

The Workshop considered a series of issues regarding model standards for firearms marking.

3.3.1 Standard for Firearms Marking

The first issue to be considered was the general standard for the physical marking of firearms. Although the Workshop was concerned with this type of specific standard question, It should be noted that the Workshop endorsed the earlier recommendation found in the “Report on Firearms Community Recommendations Regarding Firearms Marking Issues,” i.e. that “All firearms should be marked at the time of manufacture with unique identifying information consisting of the name of the manufacturer, the place of manufacture and a serial number.” The Workshop believes that this baseline recommendation reflects an emerging international consensus.

The Workshop discussed, but did not adopt specific quantitative numerical standards (depth of the mark, height of the mark, etc) for the different types of marking.⁵ A quantitative numerical or technical approach would have had to overcome two major difficulties. In the first instance, it would be extremely difficult for the interested parties to agree on the actual numerical values; this would be a very arduous task. The second difficulty is that such an approach would be overly complex. It was the judgment of the Workshop that to be effective any standard should be kept as simple as possible.

In addition to these two concerns, the Workshop was of the opinion that since the primary purpose of marking is to facilitate tracing of firearms by law enforcement agencies, a standard for the actual physical marking should be phrased in terms of recoverability. Given these considerations the Workshop adopted the following standard:

Recommendation 1 - Standard for Firearms Marking

Each manufacturer shall mark identifying information upon the firearm in such a manner as the mark may be recoverable.

⁵ These would include, among others, marking by roller dye, laser engraving or mircodot matrix. The Workshop received a short presentation on these methods from a technical expert.

Finally, in reference to this standard the Workshop reiterates another recommendation from the “Report on Firearms Community Recommendations Regarding Firearms Marking Issues,” i.e., that if there is a specific location requirement for marking and that the location be the frame or receiver of the firearm.

3.3.2 Duplicate Markings

This recommendation was considered essential to any effective system of model standards for marking:

Recommendation 2 – Duplicate Markings

Each manufacturer shall establish control procedures to avoid duplicate (identical) marks on the firearms it produces.

Initially, there was discussion of a companion standard to avoid the production of firearms without markings. It was decided that this was unnecessary because such a requirement is implied in the first recommendation.

It was noted that that the term “establish” implies written procedures. It was also noted that the necessity of avoiding duplicate serial numbers applies to the manufacturer as a whole and not just to a certain model. A manufacturer could not use the same serial number for different models. Procedures to avoid accidental duplication should also be used.

3.3.3 Records Retention

There was extensive discussion of this recommendation. Several manufacturers expressed the strong opinion that records should be kept indefinitely. There was also a consensus that should be arrangements for the retention of the records of companies which go out of business.

The workshop eventually settled on this recommendation:

Recommendation 3 – Records Retention

Each manufacturer shall establish procedures whereby records of what markings were applied to what firearms are kept for at least ten years.

It was emphasized that this was a minimum requirement and that the best practice would be for indefinite retention.

3.3.4 Tracing Requests

There was extensive debate and discussion regarding the appropriate time for manufacturers to respond to a tracing request. The point was made that the manufacturers wanted to assist law enforcement in all feasible ways. Alternatively, it

was pointed out that manufacturers in some jurisdictions are not capable, because of lack of adequate technology, to quickly trace guns.

The group decided that the best text would incorporate an urgency to respond to law enforcement tracing requests, but also recognize some manufacturers' difficulties. The adopted language is as follows:

Recommendation 4 – Tracing Requests

Each manufacturer shall establish procedures whereby any request for tracing information from an appropriate law enforcement agency is responded to as soon as possible, but not later than within 72 hours of receipt of the request.

It should also be noted that the term “appropriate law enforcement agency” does not mean any law enforcement agency, but an agency with official authority over the company.

3.3.5 New Technologies and Information Sharing

This recommendation was one of the most extensively discussed by the Workshop. It was decided that there needs to be some means by which new technologies can be evaluated and incorporated into the model standards. In addition, the standards themselves need to be communicated to governments and the industry, and further there needs to be a procedure by which the standards may be amended.

It was decided that some “mechanism” was needed to perform these tasks. This mechanism could possibly be based on the review procedures contemplated under both the Convention and the Protocol. It was noted that the current draft of the Protocol makes reference to encouraging the firearms industry to use new technologies.

It was also noted by the Workshop that there needs to be some means for the firearms industry to contribute this process. A “manufacturer’s advisory group” was discussed as a method to do this. The Workshop adopted the following recommendation:

Recommendation 5– New Technologies and Information Sharing

An appropriate mechanism shall be established to–

- A. Periodically evaluate new firearms marking technologies and make recommendations regarding such technologies.**
- B. Communicate the model standards on firearms marking to relevant government bodies and members of the firearms industry.**
- C. Consult on and periodically review the model firearms marking standards, and if necessary, recommend amendments to such standards.**

3.3.6 Common Serial Number Codes

The topic of common or voluntary serial number codes was discussed by the Workshop. A possible system based on a three letter code for each manufacturer and place of manufacture was outlined for the participants. In addition a Swiss representative described a similar system his government had developed. He emphasized that such a code system should make it easy to identify the country of origin of the weapon.

The group also briefly discussed some of the complexities of such systems such as intellectual property and trademark questions. However, there does not yet seem to be a consensus on the part of the international community that a system should be instituted. Given this, it was decided to defer any determination on codes and merely set forth the two options as described above.⁶

⁶ **WFSA Approach to Voluntary Codes:**

A system of codes designating the manufacturer and the place of manufacture is a complex endeavour. Such a system must take into consideration a myriad of issues including existing practices, practicalities of expanding the size of the mark and intellectual property questions.

Regardless, there has been discussion of having a system whereby manufacturer and place of manufacture can be discerned from the serial number alone. This is sometimes referred to as “unique serial number.” The issue is made harder because this information is currently being marked upon most firearms. If indeed, necessary information is placed upon firearms, it can be argued that a new system should be voluntary, i.e. codes may be used in lieu of the required information appearing on the firearms in a normal manner. In other words, there should be enough flexibility that firearms being marked in a current manner, which furnishes the necessary information, could continue to be marked in that manner. This approach would also be in less conflict with existing national marking requirements.

Scope of a Code System

A more specific initial question is whether these codes should go beyond manufacturer and place of manufacture. It has been noted that other information, calibre, year of manufacturer, and such, would be superfluous if the country of origin and manufacturer are included within the serial number, i.e., one can easily obtain the other information from the manufacturer.

Regardless, the firearms industry might want to establish a system of voluntary codes, to be used with serial numbers, to designate manufacturer and place of manufacture. Required information could be marked upon firearms through the use of such codes or normal written language or trademarks.

Content and Language of a Code System

It is hoped that the code system itself would meet five criteria: Be as simple as possible, Be easy to use, Be a recognizable code for the manufacturer and place of manufacture, Be adaptable and Use a minimum number of spaces.

To meet those ends, a possible system could give each manufacturer in each place of manufacture, e.g., STURM, RUGER & CO. INC. SOUTHPORT. CONN. U.S.A., a three letter code. The use of three letters gives 17,576 combinations and only uses three spaces. Thus, the code for STURM, RUGER & CO. INC. SOUTHPORT. CONN. U.S.A. could be: “RGR” . If there was a need, or a request, for a second place of manufacture, a second code could be assigned.

Designating the Code as the Code for Manufacturer and Place of Manufacture

It has also been proposed that there needs to be some means to separate out these letters from the rest of the content of the serial number. Two suggestions were made, either a “+” or a “/”. Ruger’s code with a designation and a serial number could look like this: “RGR/5638874” or “RGR+5638874” .

Allocation

Manufacturers could be allocated their codes on a first-come, first-served basis. There are other considerations however, such as respecting existing names and letter combinations in which a manufacturer may hold a proprietary interest.

Manufacturers, working together could assign themselves specific three character alphabetic codes. However, the allocation of codes should take into consideration that certain combinations have developed secondary meaning by their present users. A system of prioritising allocation of codes would need to be

4. Workshop Conclusion

The Workshop concluded after a review of the prior adopted recommendations.

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developed. Once a code has been appropriately assigned, it would become the property of the assignee. A permanent register of assigned codes would have to be kept.

Swiss Approach to Codes:

The Swiss approach to codes is similar to what is presented above, although a bit more comprehensive in its scope. According to a Swiss presentation at the EAPC, Brussels Workshop, 20-21 March, there would be codes for the country of origin, the manufacturer, the model/type of firearm and the importer. This example was presented: “1234567/CH/SIG/090/SAU” — “1234567” is the serial number, “CH” is the code for the country of origin, here e.g. Switzerland, “SIG” is the code for the manufacturer, here e.g. SIG Arms, “090” is the code for the specific model/type and “SAU” is the code for the importer, here e.g. Sauer.