

**Statement of the Firearms and Ammunition Import/Export Roundtable  
ATT CSP9  
General Debate**

*Tuesday, 22 August, 2023*

Madam President, your excellencies, delegates, and Colleagues:

Thank you for the opportunity to speak today. The Firearms and Ammunition Import/Export Roundtable, known as the F.A.I.R. Trade Group represents the importers and exporters of firearms, ammunition, and components, and are on the front lines of ATT-related international transfers.

Madam President, we would like to congratulate you and thank you for the thoroughness, professionalism, and transparency with which you have conducted your presidency. We are also very appreciative of your selection of the conference theme "The Role of Industry in Responsible International Transfers of Conventional Arms.". As States Parties have pointed out in their interventions throughout the preparatory process, and as illustrated by other industries' experiences, a cooperative working relationship between government regulators and company representatives has, and can continue, to play a significant role in identifying and preventing the illicit diversions and trade of small arms and ammunition. The fact is none of us is as smart as all of us. The proven benefits of States Parties building bridges and solid working relationships with regulated companies should be formally incorporated as a cornerstone of Arms Trade Treaty implementation guidance.

From the earliest days of the ATT, a stated benefit for industry—and the foundational reason why industry should support the ATT—has been the promise of a simple and unified transfer process among all States Parties that will save money and help protect a company's reputation. It would be easier to transport products across multiple jurisdictions if every country had unified processes and policies. We are concerned, however, that we may be unintentionally undermining that promise. For several years now, the ATT has been collecting and making available documents for States Parties to consider in developing their national controls. These are identified in Annex A of the President's working paper. There are dozens of documents...hundreds of pages...of voluntary implementation guidance for States Parties to consider. This can fundamentally undermine the concept of universality of import/export regulations which has been the promise to industry.

We therefor respectfully suggest the following path forward:

Universalization has two forms. There has been considerable focus on having all states join the ATT. But the other is having a common vision of what import/export controls look like across all States Parties. To create that common vision, working groups should evaluate and dissect all of the optional guidance documents, identify the key criteria, operationalize those criteria, and distribute those for discussion and agreement by the States Parties.

Finally, there is an old saying in the business world that you can't manage what you don't measure. It is critical that as we continue to develop effective guidance for States Parties, these criteria must be objective, tangible, and measurable in order to make a real difference in achieving our common goals.

Thank you!