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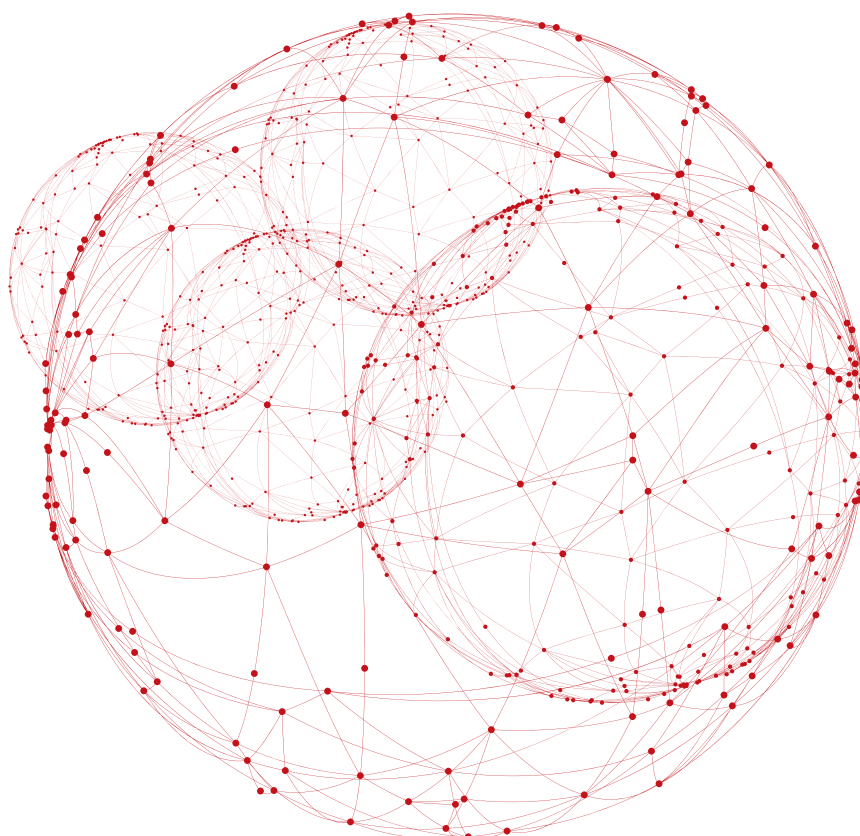


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Feasibility Study on Linking Small Arms & Light Weapons Registration Systems in South East Europe

EXECUTIVE SUMMARY REPORT





Feasibility Study on Linking Small Arms & Light Weapons Registration Systems in South East Europe

Executive Summary Report

Contents

Abbreviations & Acronyms	6
About the Executive Summary Report	7
Background & Context	7
Purpose & Scope	9
Study Findings	11
PESTELOM Analysis	23
The way forward – A “road map”.	32
Conclusion	38
Summary of Key Recommendations	40

Abbreviations & Acronyms

AMIS	Arms Management Information System
DNA	Deoxyribonucleic Acid
EU	European Union
EUSAC	EU Support of SEESAC Disarmament and Arms Control Activities in South East Europe
FFP	Firearms Focal Points
IBIN	INTERPOL Ballistic Information Network
ICT	Information Communication Technology
IT	Information Technology
PESTELOM	Political, Economic, Social, Technological, Environmental, Legal, Organisational and Media
RCC	Regional Cooperation Council
SALW	Small Arms & Light Weapons
SEEFEN	South East & Eastern Europe Firearms Experts Network
SEESAC	South Eastern and Eastern Europe Clearinghouse for the Control of Small Arms and Light Weapons
SQL	Structured Query Language
UNDP	United Nations Development Programme

About the Executive Summary Report

This Executive Summary Report is a condensed version of the Final Report. It is arranged in a similar layout to the Final Report to enable the reader to more readily refer to the appropriate section if more detail is sought. This Summary Report has limited references. It is intended to provide the reader with the key aspects of the feasibility study, its findings and recommendations.

Background & Context

The South Eastern and Eastern Europe Clearinghouse for the Control of Small Arms and Light Weapons (SEESAC) is a joint initiative between the Regional Cooperation Council (RCC) and the United Nations Development Programme (UNDP). SEESAC was launched on 8 May 2002 as the executive arm of the Regional Implementation Plan on Combating the Proliferation of Small Arms and Light Weapons (SALW). At its core, the Regional Implementation Plan seeks to enhance regional cooperation in this area, providing both the sharing of information as well as the setting of local standards geared toward direct project formulation and implementation. The Plan envisions continued SEESAC support for national SALW control programmes.



Purpose & Scope

The purpose of the study has been to provide a normative, institutional, and technical analysis in the form of a Feasibility Study on the Possibilities of Linking the Small Arms and Light Weapons Registration Systems of South East Europe, namely those of: Albania, Bosnia and Herzegovina, Kosovo*, the Republic of Moldova, Montenegro, Serbia, and the former Yugoslav Republic of Macedonia. They are referred to collectively as the “study beneficiaries”. The registries under consideration are those used for law enforcement purposes. The SEESAC explanatory note on this study advises that this study will provide preliminary recommendations and action points. These are set out in the “Road Map” and “Summary of Key Recommendations” sections below.

9

In this study the term “Small Arms and Light Weapons” has been considered in accordance with the United Nations General Assembly Report of the Panel of Governmental Experts on Small Arms¹ and the International Tracing Instrument². However, there are aspects of the relevant laws of the study beneficiaries that draw in additional items. These are noted in the Final Report.

For the purposes of this research the term “SALW Registration Systems” refers to all available SALW registries, of each of the study beneficiaries, which would cover aspects such as legally registered, lost or stolen, tracing and import/export. The term does not include registries of SALW which are intended for military and law enforcement purposes. “Collecting and analysing information” and “linking” refers to exploring the opportunities for facilitated data exchange between these registries.

In relation to context, it is noted that six of the study beneficiaries are indicated by the European Council as Candidate or Potential Candidates for membership of the European Union³. Accordingly, this research has utilised relevant EU requirements and practices for comparative purposes.

* References to Kosovo shall be understood to be in the context of Security Council resolution 1244 (1999).

1 Report of the Panel of Governmental Experts on Small Arms. United Nations General Assembly. 27th August 1997. <http://www.un.org/depts/ddar/Firstcom/SGreport52/a52298.html>

2 International Instrument to Enable States to Identify and Trace, in a Timely and Reliable Manner, Illicit Small Arms and Light Weapons adopted by the United Nations General Assembly on the 8th December 2005.

3 http://ec.europa.eu/enlargement/countries/check-current-status/index_en.htm

Although the EU Firearms Directive⁴ amendment⁵ advises that firearms are classified in part II of Annex I, and the report from the European Commission to the European Parliament and Council on the implementation of the Firearms Directive⁶ advises that the Directive classifies firearms into four categories, in this report, for the purpose of consistency and to minimise the risk of misunderstanding, the report utilises the term “categorisation” rather than “classification” when referring to defining firearms in relation to the Directive.

The study has explored:

- 1) The data set parameters collected and used by the beneficiaries
- 2) The compatibility of datasets recorded and used
- 3) The level of detail datasets capture in comparison to the European Union level

In addition to documentary and online research, the study team has conducted visits to each of the study beneficiaries. In the case of Bosnia and Herzegovina this included visits to the all 10 cantons of the Federation of Bosnia & Herzegovina, Republika Srpska, and Brčko District.

⁴ Council Directive of 18th June 1991 on control of the acquisition and possession of weapons (91/477/EEC). European Council. Brussels.

⁵ Directive 2008/51/EC of the European Parliament and of the Council of 21st May 2008 amending Council Directive 91/477/EEC on control of the acquisition and possession of weapons. European Parliament.

⁶ Report from the Commission to the European Parliament and the Council, the implementation of Council Directive 91/477/EEC, of 18 June 1991, on control of the acquisition and possession of weapons. European Commission 15th December 2000. Brussels.

Study Findings

Although each beneficiary controls a range of weapons in civilian possession, the focus of the European Firearms Directive is narrower. The term “firearm” is defined in the amended Directive and is used in that context here.

Each beneficiary has a range of registries that cover possession of firearms by civilians, firearms (and other ballistic material) coming into police possession from crime scenes or through police operations and border control activities. A summary table is provided below for each beneficiary in relation to their categorisation of firearms and natural person/firearm datasets, as well as other aspects that will assist in consistency for tracing and effective registry linking.

11

For the purposes of comparison, the EU uses a minimum dataset for natural persons and firearms, which is reflected in the content of the European Firearms pass. These are:

Natural Person

- Surname and first name(s)
- Date and place of birth
- Nationality
- Address
- A photograph is utilised together with a signature

Firearm

- Type
- Make/model
- Calibre
- Serial number
- Category under the Directive (as opposed to under the law of a member state).

The Directive provided categorisation is a minimum. EU member states are permitted to utilise stricter controls if they consider it necessary. Such stricter controls include the placing of a firearm into a higher category of control. It is for this reason that the standard dataset relates to the (original) category under the Directive. The tables below indicate if the beneficiary has adopted the natural person/firearm datasets and the categorisation of the Directive as a minimum. If the beneficiary has adopted stricter controls, then that is not shown here and the Final Report should be consulted. The tables also show if the beneficiary has adopted the definitions of a “part” and of an “essential component” in accordance with the Directive.

To assist in tracing, the amended EU Directive indicates that marking at manufacture or placing on the market should either utilise a mark in accordance with the international agreement on the reciprocal recognition of proof marks⁷ or any other unique alternative marking with a numeric or alphanumeric code, so as to permit ready identification. The United Nations International Small Arms Control Standard⁸ indicates that small arms should be marked at manufacture and import (at least) by use of the International Organisation for Standardization (ISO) 3166 part 1 code and is also a requirement of the 258/2012 implementing Article 10 of the UN firearms protocol. The tables thus indicate if the beneficiary applies markings that meet the Directive requirement at Article 4 (which application of the ISO 3166 part 1 code would do).

12

The amended Directive (Article 4) also requires computerised records (though not necessarily centralised) that retain the name and address of the supplier and owner of a firearm, together with the above standard firearm dataset for at least twenty years. Similar requirements are placed on dealers.

At Article 4b, there is a consideration of establishing controls on brokers. The tables indicate if the beneficiary registers the brokers or requires the licensing or authorisation of the brokering activity.

Further columns indicate if the beneficiary has adopted the Directive requirements in respect of minimum age, purpose and minimising danger to themselves, public order and public safety (Article 5 of the amended Directive), and commensurate controls on ammunition (Article 10).

The amended Directive (at Annex I) includes certain provisions in respect of the permanent deactivation of firearms. These include rendering all essential components permanently inoperable and incapable of removal, replacement or other modification with a view to becoming operable again. The provisions also require independent inspection of the work undertaken, marking to that effect and the issuance of a certificate of compliance. The EU has relatively recently published minimum standards (referred to as Common Guidelines) for permanent deactivation of firearms⁹. As this is one stated

⁷ Convention for the reciprocal recognition of proof marks on small arms (with regulations and annexes). Signed at Brussels on 1 July 1969.

⁸ International Small Arms Control Standard ISACS 05.30. Marking and Record Keeping. 27th August 2012. United Nations.

⁹ Commission Implementing Regulation (EU) 2015/2403 of 15 December 2015. The European Commission, Brussels.

exception to firearms registration it is important to have confidence that the beneficiaries are applying this requirement, so that the registries include all firearms that should be included.

This comparison enables a better understanding of the groundwork necessary to utilise common datasets in any registry linking.



Tables

Key

Compliant, meets minimum requirement	Under development	Not applicable

Albania

EU Firearms Directive compliance subject

Albania

EU FA Directive Categorisation	
Article 1 Definition of firearm	
Article 1 Definition of part	
Article 1 Definition of essential component	
Article 4 Marking	
(UN ISACS 05:30 Marking)	Marks "AL" & year of import.
Article 4 Computerised record and retention	AMIS (LINUX)
Article 4b Broker Controls	
Article 5 Good reason, age and safety requirements	
Article 10 Ammunition controls	
If SALW deactivation is recognised; Annex 1 Deactivation provisions	Has provisions – not yet aligned with EU Common Guidelines.
Natural Person dataset	
Firearm dataset	Shows local Category C5 for Directive Category D1

Further Registries

Tracing Registry	ARSENAL forensic/tracing database (LINUX) – not linked to others.
Import/export Registry	Customs Database – not linked to AMIS or Arsenal

Procedures

Test Firing	For Category B only at present.
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Compliant, meets minimum requirement

Under development

Not applicable

Bosnia and Herzegovina

(This table only gives a high level overview. The detail for the Federation, entities and cantons is within the Final Report).

EU Firearms Directive compliance subject

Bosnia and Herzegovina

EU FA Directive Categorisation	Follows ABCD categorisation though with detail differences between entities and cantons.
Article 1 Definition of firearm	
Article 1 Definition of part	
Article 1 Definition of essential component	
Article 4 Marking	Has legal provision but currently applied only to manufactured, not imported SALW.
(UN ISACS 05:30 Marking)	
Article 4 Computerised record and retention	Includes ORACLE, LINUX, Windows (see final report for detail).
Article 4b Broker Controls	
Article 5 Good reason, age and safety requirements	
Article 10 Ammunition controls	
If SALW deactivation is recognised; Annex 1 Deactivation provisions	Has provisions where recognised - not yet aligned with EU.
Natural person dataset	
Firearm dataset	Does not show Directive Category.

Further Registries

Tracing Registry	Several unlinked registries.
Import/Export Registry	Not linked.

Procedures

Test Firing	Has legal provision, though not yet in full practice.
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Compliant, meets minimum requirement

Under development

Not applicable

Kosovo

EU Firearms Directive compliance subject

Kosovo

EU FA Directive Categorisation	Variance from Directive in respect of pneumatic weapons does not affect compliance.
Article 1 Definition of firearm	
Article 1 Definition of part	
Article 1 Definition of essential component	
Article 4 Marking	Marks "RKS" & year of import.
(UN ISACS 05:30 Marking)	
Article 4 Computerised record and retention	SACONS (Inc. CARTWIN PRO). (SQL).
Article 4b Broker Controls	
Article 5 Good reason, age and safety requirements	
Article 10 Ammunition controls	
If SALW deactivation is recognised; Annex 1 Deactivation provisions	Has provisions – not yet aligned with EU – in progress.
Natural Person dataset	
Firearm dataset	

Further Registries

Tracing Registry	BERT & IBIS.
Import/Export Registry	

Procedures

Test Firing	Has volume processing challenges
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Compliant, meets minimum
requirement

Under development

Not applicable

Moldova

19

EU Firearms Directive compliance subject

Moldova

EU FA Directive Categorisation	
Article 1 Definition of firearm	
Article 1 Definition of part	Does not yet align with exact wording.
Article 1 Definition of essential component	
Article 4 Marking	Has provision but not yet in practice.
(UN ISACS 05:30 Marking)	
Article 4 Computerised record and retention	State Register of Arms (ORACLE 11E, Solaris 10).
Article 4b Broker Controls	
Article 5 Good reason, age and safety requirements	
Article 10 Ammunition controls	
If SALW deactivation is recognised; Annex 1 Deactivation provisions	Has provisions – not yet aligned with EU.
Natural Person dataset	
Firearm dataset	Does not include Directive Category.

Further Registries

Tracing Registry	Ballistic Forensic Registry – not linked.
Import/Export Registry	Not linked.

Procedures

Test Firing	Not linked.
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Compliant, meets minimum requirement

Under development

Not applicable

Montenegro

EU Firearms Directive compliance subject

Montenegro

EU FA Directive Categorisation	
Article 1 Definition of firearm	
Article 1 Definition of part	
Article 1 Definition of essential component	
Article 4 Marking	Has provision. Marks locally manufactured but not imported SALW.
(UN ISACS 05:30 Marking)	
Article 4 Computerised record and retention	(ORACLE).
Article 4b Broker Controls	
Article 5 Good reason, age and safety requirements	
Article 10 Ammunition controls	
If SALW deactivation is recognised; Annex 1 Deactivation provisions	Has provisions – not yet aligned with EU.
Natural Person dataset	
Firearm dataset	

Further Registries

Tracing Registry	Not linked (ORACLE).
Import/Export Registry	Not linked (ORACLE).

Procedures

Test Firing	Has provisions.
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Compliant, meets minimum
requirement

Under development

Not applicable

Serbia

21

EU Firearms Directive compliance subject

Serbia

EU FA Directive Categorisation	Uses ABCD categorisation but does not fully align category A (relevant ammunition not included, nor sub categories).
Article 1 Definition of firearm	
Article 1 Definition of part	Does not include "suppressor" here but assigns it to category A.
Article 1 Definition of essential component	
Article 4 Marking	Has provision. Marks locally manufactured but not imported SALW.
(UN ISACS 05:30 Marking)	Will mark "RS" & year of import.
Article 4 Computerised record and retention	(ORACLE GBOSS, Windows AIX)
Article 4b Broker Controls	
Article 5 Good reason, age and safety requirements	
Article 10 Ammunition controls	
If SALW deactivation is recognised; Annex 1 Deactivation provisions	Has provisions and will align with EU standards.
Natural Person dataset	
Firearm dataset	

Further Registries

Tracing Registry	ARSENAL. Partially linked to system above.
Import/Export Registry	Not linked.

Procedures

Test Firing	Planned to be introduced in law.
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Compliant, meets minimum requirement

Under development

Not applicable

The former Yugoslav Republic of Macedonia

EU Firearms Directive compliance subject

The former Yugoslav Republic of Macedonia

EU FA Directive Categorisation	
Article 1 Definition of firearm	
Article 1 Definition of part	Does not match Directive list (omits frame/receiver. Does not include suppressor but assigns them to category A).
Article 1 Definition of essential component	
Article 4 Marking	Has provisions, not yet applied.
(UN ISACS 05:30 Marking)	
Article 4 Computerised record and retention	(Linux environment; Websphere and DB2 and Rational Developer (Java))
Article 4b Broker Controls	
Article 5 Good reason, age and safety requirements	
Article 10 Ammunition controls	
If SALW deactivation is recognised; Annex 1 Deactivation provisions	Not yet aligned with EU Common Guidelines
Natural Person dataset	
Firearm dataset	

Further Registries

Tracing Registry	Not linked.
Import/Export Registry	Not linked

Procedures

Test Firing	Linked to tracing database. Has volume processing challenges.
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Compliant, meets minimum requirement

Under development

Not applicable

PESTELOM Analysis

Political

All the study beneficiaries (collectively referred to in this section as the “region”) have significant governance commitment to the appropriate control of SALW. This includes activity in pursuit of international agreements, for example in respect of stockpile management, cross-jurisdictional SALW anti-trafficking operations and appropriate controls on the possession of weapons (including firearms) by civilians.

23

It appears that there is a strong, positive, integration influence provided by the EU. Given the previously mentioned accession interests it appears only too clear that registry linkage should primarily be pursued in parallel with achieving compatibility with EU practice and requirement. The window of opportunity to do so may be limited.

It is also apparent from the wide range of research visits to each beneficiary that there is a developing sense of interconnectedness, and a genuine appreciation of the achievement multiplier that working collaboratively in the region can provide. This allows for an optimistic view of the potential to make effective progress, and should be cherished.

Unsurprisingly, the differing experience of the beneficiaries has led to differences in approach to controls. This can be seen in the tables above where there is inexact correlation with the amended EU Firearms Directive despite a political will to align. In addition, there are some differences in categorisation of items resulting in them being in different categories within the region (see the Final Report). A good example are acoustic signalling devices, or “blank firers”. The lack of controls alignment in such areas across the region leads to control issues for one or more of the beneficiaries.

All beneficiaries demonstrate a high priority commitment to citizen safety and the investigation of gun enabled crime. There are differences between beneficiaries in respect of the systems in use for forensic ballistic registries, and indeed within the jurisdiction of beneficiaries it is usual to find that the operating system for such registries is different from that used for civilian possession records. In many cases it appears that the system for civilian possession records has greater flexibility than that used in respect of forensic records.

Economic

Understandably all beneficiaries have very real challenges in resourcing the support for controls, whether this is in terms of staffing, hardware or software. There does not appear to be evidence of cost benefits analyses which would drive prioritisation. This is a familiar issue in more or less any jurisdiction, not simply this region. Political support for the priority of work in this area has enabled strong progress, but it is very apparent that the economic landscape continues to be one where collaborative assistance from organisations such as UNDP is both welcome and extremely helpful.

This work has suggested three principal options (see below) for progressing the linking of registries, and within them has identified a range of possible initiatives, both within beneficiaries and across the region, that might very usefully be pursued. These will require ongoing financial and other support, including inputs from experience outside the region, as well as supporting representatives from the beneficiaries to be able to make their own extremely valuable contributions to other jurisdictions outside the region.

If there is a tendency outside the South East Europe region to regard the flow of experience and learning to be anything other than two-way then that needs to be corrected. There is much to be gained from economic support to enable the beneficiaries to contribute their learning to others.

24

Few jurisdictions (not only the beneficiaries here) have conducted much analysis to establish the extent to which the fees charged for civilian possession ought to reflect the actual costs of the processes involved. At a high level this is understandable. The ability to lawfully possess weapons is provided for in each of the beneficiaries' legal systems. Having established that provision then the purpose of the permit system could be seen to be one of preventing access by those who are unsuited to possess firearms. The system primarily exists not to facilitate those who possess but to prohibit those who are unsuitable. Accordingly, the system is one of public protection and the costs fall to the general policing or Ministry of the Interior/Ministry of Internal Affairs budget. However, there may be grounds for considering the administrative costs associated with actual permit issue and to what extent these are reflected in the fees charged.

Within the region there are fairly wide variations in the fees. There are understandable concerns that the scale of the fees must not tend towards inhibiting those who lawfully possess from registering their weapons, however in circumstances where funding for public safety itself is constrained, then it may be useful for the region to have broad agreement on the approach to fees, for example agreeing which elements ought to be taken into account when a fee is set.

Recommendation 1: As part of the deployment of any new firearms licencing and registry system, be it local, beneficiary or regional the associated administrative costs should be clearly defined in order to provide a potential baseline for a consistent regional fees structure that reflects the maintenance and administrative costs of the system.

There is a wide facility in the region to test and mark firearms for civilian possession, but limited activity in practice. It is widely cited that the costs of doing so are prohibitive and that firearm manufacturers object to the latter (see the Legal section below). It should also be noted that several participants indicated that the return on investment for test firing may be limited as such firearms did not form the basis for criminal use to any large degree.

However, the use of legally held firearms in crime is almost 'undetectable' in most jurisdictions until such time as that firearm is recovered. Latterly, a legally held firearm may be reported lost or stolen in order to mask its use in crime. Accordingly, the investment may be placed to better effect elsewhere in the shorter term (if short or medium term support is all that is available). However, the objective and value of legal 'test firing' programmes should be considered on a long-term basis, providing both 'Known-Known's' in relation to the use of legally held firearms in crime, whilst also providing the capability for ballistic material from lost or stolen firearms to be compared not only on a domestic and regional basis, but also at international level.

Recommendation 2: The beneficiaries within the region should consider adopting legal test fire programmes. In all cases, the resulting ballistic material should be acquired onto the ballistics comparison systems associated with the proposed SEEBIN network (see below), the option to share those images on a regional basis should be discussed within the Regional SALW Commissions forum and the South East Europe Firearms Expert Network (SEEFEN).

Whilst the extent of the available pool of firearms for criminal use is acknowledged, any test firing programme would need to encompass manufacturers and firearms retailers, as well as import and retail controls such that all commercially manufactured firearms, are test fired somewhere. A provision should also be made to manage the replacement of essential components likely to alter the ballistic signature of a weapon. The associated firearm, and detailed demographic information should be entered into an integrated firearms licencing and registry solution as discussed below.

The criminal pool comprises many commercially or state manufactured weapons which ought to have been subject to such a programme. Only criminal manufacture (such as conversions) would escape at the outset. In due course, these legal test fire programmes would facilitate crime investigation to a significant level. It should be noted that new legal test fire programmes require considerable investment in the short to medium term. The investment required in delivering new test fire programmes can be minimised through a progressive approach that encompasses licence renewals and the reclamation of licencing fees. Where a legal test fire programme is already in existence the associated ballistic material must be 'Back Captured'; this too will require financial assistance and may require a modification to current laboratory Standard Operating Procedures.

Social

All beneficiaries have a social structure that permits the civilian possession of appropriate weapons for lawful purposes. The term weapon indicates that not all controlled items are firearms, for example crossbows. It appears that the administrations of each beneficiary are content to continue this social expectation, whilst facing the difficult balance of ensuring that controls are effective and maintain the highest reasonably achievable protections for the public.

It is usually the case that the single most effective control element in respect of civilian possession of firearms (and indeed other lethal weapons) is that of the initial assessment of the applicant's suitability. Features such as secure storage, transit arrangements, weapon records and tracing have a vital role to play, but the decision to grant authority to acquire/possess a firearm in the first instance is usually the most fundamental element. This is because after the grant of an authority (usually a weapon permit in respect of civilian possession) control systems rely on civilians coming to adverse notice of the authorities, adverse reports being made by concerned citizens or adverse reporting from medical professionals. In practice, whilst valuable, these controls are reactive. Before authority is granted, the process is pro-active. The authorities make enquiries and people are asked to respond for example. Whilst the rights of citizens are properly protected by the law of each beneficiary, particularly in respect of personal data, there is frequently local flexibility to decide the extent of background enquiries to be made prior to a decision on grant of authority. There is scope for regional good practice in this regard.

26

Recommendation 3: A regional good practice guide should be created in order to support a holistic approach to the initial assessment of an applicant's suitability to acquire / possess a firearm.

Some beneficiaries face pressure to limit the background enquiries, perhaps for cost reasons or perhaps for social pressures. There can be strong support for sound police enquiries (since each beneficiary utilises its' police for this purpose) from other organisations, including non-State bodies, for thorough background enquiries. A good example of this would be organisations that work with survivors of domestic violence. Where police are challenged to limit the extent of enquiries, then support for thorough investigation may be forthcoming from such bodies.

The research work for this study has made it very clear that the people involved in each of the beneficiaries in each of the fields involved (civilian possession, forensic, crime scene, tracing, further investigation, prosecution) are extremely committed to their field of work, and have built up excellent expertise. Experiences differ across beneficiaries and the study team have learnt a great deal from the interviews themselves. The enthusiasm for regional cooperation is obvious, and that would provide a firm platform from which to develop a simple interchange programme to further facilitate learning. This would build on the excellent forum already in existence, for example SEEFEN.

The work of UNDP SEESAC is pivotal to the sharing of good practice in this area and it is recommended that they work with all beneficiaries to develop a good practice guide on operational procedures and techniques, standard background enquiry checks for applicants and standard descriptive terms for firearms.

Recommendation 4: A UNDP SEESAC Good Practice Guidance on operational procedures and techniques, standard background enquiry checks for applicants, and standard descriptive terms for firearms and ammunition should be created.

Technological

The Final Report provides a high-level indication as to the compatibility of registries for different beneficiaries (partially reflected in the tables above). In summary, the linking of registries could be achieved.

The potential routes for achieving this can be described by setting out two options for action (in addition to the option of taking no action, which is also explored below). The first option would be to utilise only the existing registries of each beneficiary and maintain them on their current operating arrangements. The second option is that a new regional licencing and registration system be constructed so there is complete consistency across the region, this approach would see an integrated solution that provides both regional and local capabilities.

The technological issues affecting both options are covered in detail within the 'Road Map' section of this report, below.

Environmental

The current registries have some environmental impact, particularly in terms of the form of product, e.g. weapon permit form. This remains of interest and the appropriate environmental impact assessments ought to be conducted in terms of decisions in relation to registries.

In this arena the most significant element of environmental impact is likely to be in relation to SALW destruction. This study was not commissioned to look at destruction specifically, but that aspect is relevant because the registries for crime scene recoveries/evidence and civilian possession both have links to destruction.

Recommendation 5: An assessment of the environmental impact relating to the destruction of SALW and ammunition within the region should be carried out in order to fully assess current procedures, as well as recommending possible 'cleaner' alternatives.

Legal

Whilst the classification of weapons ought to be based upon a threat and risk assessment for each beneficiary as well as the region, the more expedient reality is that achieving a consistent approach is likely to be best achieved by reference to existing systems for weapon classification. Very nearly all beneficiaries have a classification approach to civilian possession that is based upon the model described in the relevant EU Directive (as amended). The overview comparator table above gives an indication of this, and the separate sections relating to the beneficiaries contain the detail. There will need to be ongoing encouragement and support to achieve this and current plans aim to introduce harmonisation through 2016/17. The EU Directive (as amended) does not prescribe what falls into which category exactly, and allows for states to apply stricter controls if they wish. Whilst the EU Directive arrangement is frequently referred to as a Category ABCD model, in fact the amendment did initially encourage a “prohibited and allowed” approach. This has not been seen by the EU as providing additional public safety.

There is close (but not exact) alignment within the region on what is prohibited from civilian possession. There is also reasonably close alignment on what is allowed subject to permit. There is more variation in respect of what is allowed subject to registration/notification. However, the inconsistencies mean that there is incomplete alignment with the requirements of the EU Firearms Directive (as amended). This means that there are issues of inconsistent enforcement effort, opportunities for criminal exploitation and a lack of efficiency. This also applies to the permanent deactivation of SALW, where the adoption of the EU Common Guidelines should be completed.

There is wider variation in respect of defining thresholds at which items such as air weapons (pneumatic weapons) are subject to controls. These variations indicate scope for further work to harmonise arrangements within the region, and to facilitate registry linkages. Differences in thresholds for air weapons, airsoft guns and paintball markers can cause issues for neighbouring jurisdictions.

In addition, some beneficiaries are finding it necessary to legislate once a misuse problem arises. There is an opportunity to pre-empt issues by developing commonality in law across the region now.

Recommendation 6: The beneficiaries within the region should move towards a full alignment with EU firearms controls, categorisation and legislation. This process should be facilitated and supported via the Regional SALW Commissions meetings and SEEFEN platform.

The provisions for civilian possession have a very similar legal basis across the region and allow for similar grounds for refusal or revocation. The laws are supported by detailed arrangements to implement the necessary systems, for example through “rulebooks”. The provisions allow for similar offending histories to be considered. There is variation in the extent of background checking. The more extensive will include intelligence records checks with other organisations and with the wider community. There are some security concerns in that respect as the potential for disclosing the storage location of privately

owned weapons may be an issue. Future consideration could be given to DNA sampling and/or fingerprinting of those involved in the lawful possession of weapons, although this is likely to be considered an extreme step, and proportionality may be hard to demonstrate. It is not yet a common practice elsewhere.

Recommendation 7: Future consideration could be given to DNA sampling and/or fingerprinting of those involved in the lawful possession of weapons.

The arrangements for permanent deactivation of firearms vary widely in the region. This variation extends to what may be deactivated, who may possess it, the authority for possession, who conducts the deactivation, who inspects the deactivation and the standards to which the deactivation must conform. The adoption of the EU Common Guidelines should be completed.

Recommendation 8: The beneficiaries, through Regional SALW Commissions meetings, should work to establish a common agreement in relation to the permanent deactivation of firearms. This should include what may be deactivated, who may possess it, the authority for possession, who conducts the deactivation, who inspects the deactivation and the standards to which the deactivation must conform. This process should also take into account the opportunities presented by a regional licencing and registry system as recommended above.

There appears to be some variation in the penalties attributed to offending and there is also scope for the development of good practice for Prosecutors, through shared experience and practice.

Recommendation 9: Creation of good practice and common standards guide in relation to the penalties attributed to the unlawful possession of deactivated firearms. This should be supported with prosecutorial information exchange through SEEFEN, and other fora where appropriate.

Legal provisions for test firing and SALW marking exist across all beneficiaries. As indicated above, there are two principal barriers, the cost of test firing related activities (exacerbated by volume) and the commercial position of manufacturers in respect of voiding warranty cover if additional marks are applied. In respect of the latter (the former being an economic issue already considered) then there may be scope for joint regional enterprise, perhaps engaging jurisdictions beyond the region, to gain consent for marking from manufacturers who would still wish to trade and who would need to honour warranty claims in order to secure business.

In reality the application of marks is very unlikely to be done in such a way as to damage the components marks are applied to. This is already undertaken in respect of proof testing and manufacturers do not hold the position that proof marking invalidates a warranty. Whilst this study has not examined the registries relating to beneficiary owned SALW for military and law enforcement purposes, there is scope for including these in test firing databases, both to assist any investigation relating to any subsequent loss and to complement other deterrent features against theft. In addition, this would also

demonstrate beneficiary commitment to the accountability in the use of force. Such an approach would have precedent in terms of the programme for such test firing of police weapons in Northern Ireland.

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Recommendation 10: The beneficiaries within the region should assess the opportunities to create test fire programmes for military and law enforcement firearms to assist investigations relating to any subsequent loss, and to complement other deterrent features against theft. In all cases, the resulting ballistic material should be acquired onto the ballistics comparison system of the beneficiary.
.....

The legal provisions in respect of the import and export controls on SALW are very similar across all beneficiaries. Separate registries are maintained for these purposes, usually with a further focus on ensuring the correct tariffs are charged. Generally, these registries are not yet linked with other registries, for example those that will later hold details of imported SALW in civilian possession.

All the beneficiaries have laws that enables (as well as protects) data sharing, for law enforcement purposes. The linking of registries would not be inhibited by such provisions. Whilst the sharing of ballistic data itself may not engage personal data protection provisions, such further work must engage Prosecutors and State Officials, who own the data and need to have a veto on specific data sharing.

Organisational

All the beneficiaries have a broadly similar approach to who owns the data on a registry, and where the responsibility for maintenance of the data, and the operating systems supporting it, sits.

Registries for civilian possession reside with either Ministries of the Interior/Ministries of Internal Affairs or police forces. Where the former own and operate the registry then it is the police who deliver the actual service to citizens, through a combination of police officers and police staff (meaning people who work for the police department but do not hold the administrative role of a police officer). This is, unsurprisingly, common outside the region too.

In order to share good practice, improve working relations and help to develop a greater understanding of the key issues on firearms registration it is recommended that an interchange visits programme for registry staff regionally should be introduced.

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Recommendation 11: An interchange visits programme for registry staff is introduced on a regional basis.
.....

Registries that hold data concerning criminal misuse of firearms, forensic material and evidence generally have similar ownership although in respect of evidence it is common that the actual items concerned are owned by the Prosecutors' Office or the Court.

Registries that relate to import and export of SALW generally belong to Ministries of Economy/Trade that have competency for foreign trade and or economy. Albania is an exception to this arrangement, as there they are overseen by a Ministry of Defence authority. These are linked to, or exchange information with, the Customs databases.

The similarity of organisational structure across the region provides a good foundation for registry linkages. It should mean that projects can be replicated in each beneficiary jurisdiction rather more simply, using common templates.

Media

The importance of gaining cross beneficiary media support must not be underestimated. Whilst such engagements are almost self-fulfilling prophecies in respect of positive reactions, there may be a risk that the public has previously experienced other such programmes of activity, without seeing an immediate and direct results. Therefore, there may be a significant degree of fatigue for projects indicating more effective SALW controls, if other projects were not perceived as having been as effective as they should have been in the past. This is often about perception rather than fact as major projects of this type require a medium to long term view, and therefore a similar level of media exposure.

31

Educating the media and general population to the medium to long-term results of such programmes is essential. This can often be achieved through direct media access to short-term actions such as forensic processes, firearms destruction activities, system demonstrations, and the use of case studies.

The provision of support for non-news based content such as documentaries is an excellent way to engage the public and media alike. In addition, it provides a platform to explain in more detail the complexities of such programmes, their place within national and regional strategies, and their expected outcomes. This approach has been used successfully in the UK across a range of subject areas, including firearms. It should be noted that be it the engagement of the news media or documentary makes there must be a coherent and structured media communications strategy that provides protection to law enforcement actions and techniques.

It would be right to also consider the media position outside of the region, which in brief is very ready to see effective international efforts to improve SALW controls in any region. In all cases, the project must have clear visibility, accountability and transparency if it is to engage citizen confidence effectively.

The way forward – A “road map”.

Having considered in some detail the current registry systems of the beneficiaries, the next logical step is to assess the potential interconnectivity options relating to these systems with a view to consider the possibility of developing a regional approach to firearms licencing and registration.

In summary, the linking of the current registry systems can be achieved, however, there are significant differences between the value of doing so within the context of the available technical options. Following the research conducted as part of this study it is suggested that there are three clear options for consideration in relation to the linking of the beneficiaries’ registry systems, these are;

- 1.** Do nothing - leave the registries un-linked
- 2.** New – Creation of a new regional registry system
- 3.** Hybrid – Attempt to link the current registry systems with the addition of a ‘Central Data Warehouse’

Option 1. **Do nothing - leave the registries un-linked**

By doing nothing and leaving the current systems unlinked it is apparent that valuable opportunities to share and collaborate on matters relating to firearms control may be missed. The creation of valuable datasets, holistic legislative development, and a ‘joined up’ approach to classification may be lost. Additionally, beneficiaries will need to replace their existing systems over time, thus replicating the effort and money spent on developing and maintaining less efficient old systems, or building new ones in isolation.

As such, ‘doing nothing’ should not be a preferred option as in reality this is accepting that the beneficiaries will, in time, have to develop their own systems. In doing so, these systems will continue to facilitate the non-sharing of registry data leading to missed opportunities and a duplication of effort and finances.

Option 2.

New – Creation of a new regional registry system

The building of a new regional firearms licencing and registry system would appear to be the most logical and forward thinking approach to firearms licencing within the region, as such it is a clear recommendation of this study.

Recommendation 12: The creation of a new, fully integrated, regional firearms licencing and registry system with a local data storage capability to hold the personal data of firearms licences.

The creation of a regional system with common architecture would not be without its challenges; this is partly due to ensuring that personal data related to firearms licencees can be held at a national level, whilst enabling the sharing of lost and stolen firearms demographic information at a regional and international level. It is therefore suggested that the approach taken to delivering a new system should be both locally and regionally focused, as such the systems architecture should be representative of such an approach and be fully integrated.

Practically, this would facilitate the creation of a regional layer within the systems architecture to allow for the storage, retention and searching of regional firearms demographic information, such as Make and Model for the purposes of threat assessment and the facilitation of tracing, improving regional cooperation, whilst at the same time reducing cost.

Project Effect¹⁰, a significant research project funded by the EU and conducted by Coventry University (United Kingdom), has recommended the establishment of “Firearms Focal Points” (FFP) across the region. Project EFFECT recommended the development and implementation of FFP’s in order to improve the intelligence picture concerning the use of criminally held firearms and illicit trafficking activities. The implementation of FFP’s across the EU was announced in EU COM (2015) 624. Therefore, Option 2 would be contributing directly to that purpose.

In addition to the recommendation regarding FFP’s, Project EFFECT also recommended the creation of a South East European Ballistics Information Network (SEEBIN). The creation of such a network was suggested in order to provide a regional ballistics comparison capability. In doing so, it would enable territories within the region to utilise ballistics comparison technology to acquire and hold ballistic material at a local level, whilst sharing non-personal ballistic images at a regional level in order to facilitate cooperation, detect trafficking activities and prevent crime.

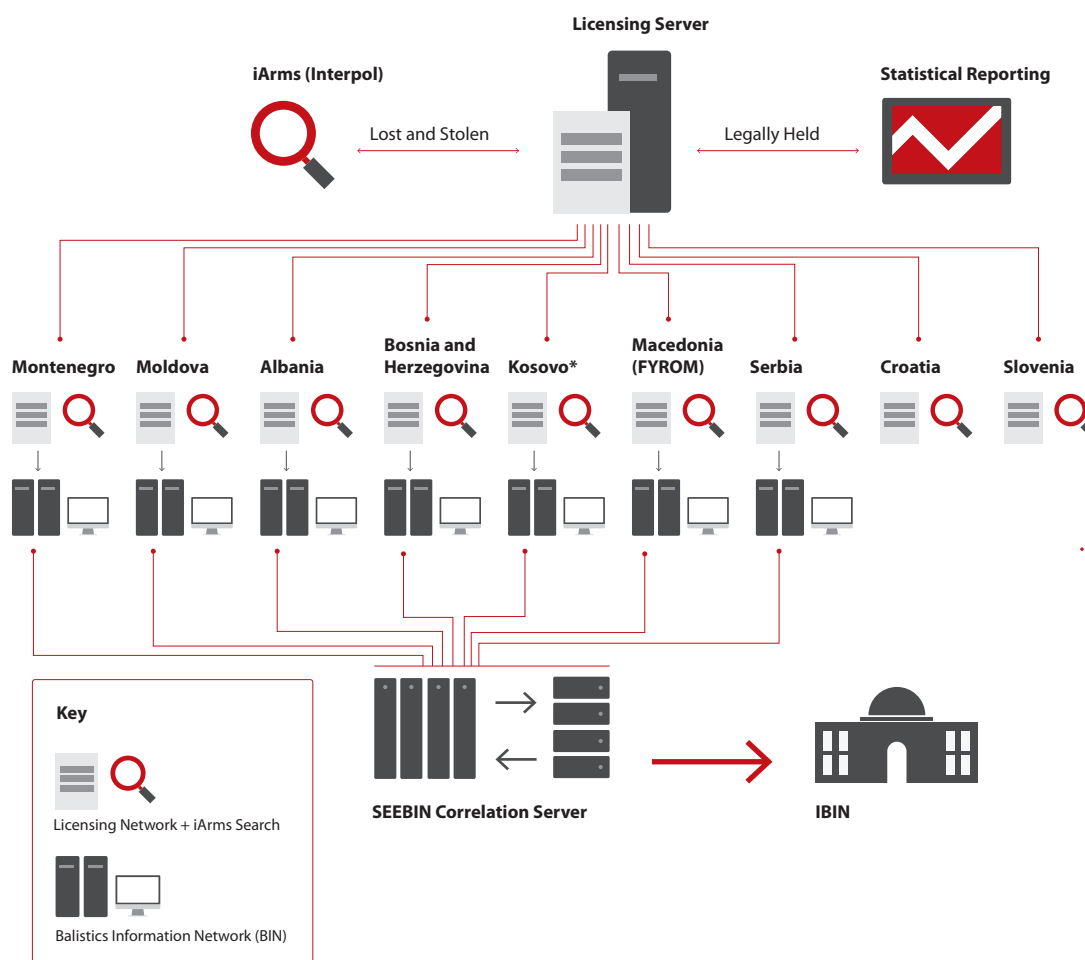
It is apparent that the architecture proposed for SEEBIN is in alignment with that of the creation of a regional licencing system. As such, it is further recommended that the proposed SEEBIN ballistics comparison network and the regional firearms licencing and registry system, be connected in order to reduce the duplication of data entry, further enhance cooperation, support crime detection, information analysis and data sharing. Such a connection

¹⁰ http://ec.europa.eu/dgs/home-affairs/what-is-new/news/news/2015/20150401_01_en.htm

would ensure that only sanitised ‘non-personal’ ballistic data would be made available at a regional and international level as per the current operating model for the INTERPOL Ballistic Information Network (IBIN). Regional ballistic connections, regardless of category (crime or legally held) would still require beneficiary-to-beneficiary co-operation via existing or future legal assistance protocols, or via a regional FFP co-operation agreement.

Recommendation 13: The new regional firearms licencing and registry system should be connected with the proposed SEEBIN ballistics comparison network in order to reduce the duplication of data entry, further enhance regional cooperation, support crime detection, information analysis and data sharing.

Figure 1:
Potential SEEBIN / licensing & registry system network architecture diagram.



The above diagram demonstrates how a holistic regional solution with local and regional data storage capabilities for both IBIS data and licencing & registry data could exist for each beneficiary, however, the exchange of data would have to be agreed on a beneficiary-by-beneficiary basis or as part of a regional data sharing agreement.

It should be noted that Montenegro and Moldova were not scoped within the EFFECT project, as such these beneficiaries were outside of the initial SEEBIN recommendations, but based on the assessment conducted through this paper, it is clear they would be a capable and much needed contributor to such a network.

Arquebus is not currently aware of any appropriate and available Commercial Off The Shelf (COTS) solutions that exist within the firearms licencing arena. As such, if the recommendation to develop a regional registry is adopted then a technical requirements study should be carried out to build a detailed specification for such a system in order that a commercial tendering process is carried out. This should involve a more detailed assessment of recently implemented firearms licencing systems in order to share experience, quickly refine technical specifications, and reduce the overall project risks.

Recommendation 14: A technical requirement study be carried out to build a detailed specification of the new regional system. This should also include a more detailed assessment of recently implemented firearms licencing systems in order to share experience, quickly refine technical specifications, and reduce the overall project risks.

Although it is beyond the remit of this study to recommend specific detail regarding the platform of such a solution at this time, it is suggested that any new system should have the following functions as the basic requirements of the system:

35

- Upload, update and archiving of records for firearms, and firearms licences,
- The ability to produce a physical 'standardised' firearms pass similar to the EU firearms pass,
- The ability to run reports at a local and regional level,
- Varied access rights,
- Interconnectivity with the EU funded and Interpol operated iArms system for lost and stolen data.

The requirements document should also include the back record conversion of existing data into the new system to reduce the burden of work on the beneficiaries during any transitional period.

Recommendation 15: The new regional firearms licencing and registry system should provide the basic functions of an integrated firearms licencing system as identified above. In addition, the associated implementation plan should include the back record conversion of existing data into the new system to reduce the burden of work on the beneficiaries during any transitional period.

An option to link to other systems such as national identity systems to improve levels of consistency and remove the need for dual entry would also be beneficial.

Due to the absence of a COTS solution, efforts have been made to compare the development costs of other firearms licencing and registry systems across the globe, including those in Australia and the United Kingdom. Based on this exercise and the number of

firearms, and firearms licences it is suggested that the indicative development costs of such a system would be in the region of €15m - €20m, along with a yearly maintenance and support cost of around €1.5-€2.0m. The associated implementation project would take in the region of three – four years to complete.

As previously identified there is the potential over time for some of these ongoing costs to be recovered as part of any licencing fees.

The linking of lawful civilian possession registries will require a number of beneficiaries to complete their work to align with the EU Firearms Directive. A such it is a recommendation of this study that this work should have a clear roadmap for completion before the implementation of such a solution.

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Recommendation 16: A clear roadmap for completion for beneficiaries to complete their work to align with the EU Firearms Directive be in place before the implementation of new firearms licencing and registry system.
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Option 3.

Hybrid – Attempt to link the current registry systems with the addition of a ‘Central Data Warehouse’

As part of the Final Report, an overview comparator table details the firearms licencing and registry systems currently in use within the beneficiaries, along with their technical operating systems. Currently, five of the beneficiaries are utilising an Oracle back-end for their firearms registry systems.

The commonality of these systems does provide a potential opportunity for interoperability. However, the other two remaining beneficiaries would require a one-time effort to bring their systems in line with an Oracle architecture.

The advantage of utilising the database management system in use by five of the beneficiaries is both technical interoperability (achieved due to built-in backwards and forward computability for processing platforms), and data exchange compatibility due to reliance on SQL engines for data collection, storage and querying. This provides a significant advantage in relation to joint data update and cooperation in terms of data addition, deletion, backup, and export, recoverability from malicious or accidental data loss.

As such, there is an option to create a ‘Hybrid’ firearms licencing and registry that utilises the common data within the relevant systems. In order to do so it will be necessary to create a centralised data warehouse that holds the firearms demographic data of each beneficiary, this would be along similar lines to Option 2 and the creation of a regional system but would rely on individual Application Programming Interface’s (API’s) to establish a connection between each licencing and registry system and the central data warehouse.

The centralised data warehouse would be utilised to support information sharing, analysis and tracing as per Option 2.

In recognising the potential to advance some beneficiaries towards a common Oracle architecture, the study is extremely conscious of the limited advantages this may provide. This is partly due to the current divergence of the individual software operating within the beneficiaries.

Although such an approach may appear to be 'easier' within the context of overall task of creating a new system, the study team are of the view that this type of solution would be in danger of creating an over-complicated system that would have a considerable risk of failure. These potential points of failure would potentially lead to an increase in overall maintenance cost, as well as associated security issues.

It is also recognised that the individual approaches to the development and onward maintenance of these disparate systems is not amenable to the facilitation of data sharing, or the increasing of regional cooperation.

Without creating a full technical specification associated with such a model it is hard to define the associated cost. However, it is estimated that the creation of the central data warehouse and the associated API's could cost around €10m and take roughly the same amount of time to implement as a new system. Yearly maintenance and support costs are estimated to be around €1.5-€2.0m

The life of such a solution would probably not exceed five-years before the inevitable replacement of licencing and registry systems across the region, this may lead to the operation of this hybrid model becoming technically and financially unsustainable.

Conclusion

Failing to take action now on the subject of linking SALW registries will miss a significant opportunity to capitalise on the regional enthusiasm for collaborative working and EU support. Taking appropriate action will enhance public safety in the region and further afield.

If we discount the option of taking no steps toward the linking of registries there are two realistic options that can be pursued to link the relevant SALW registries by function and as a whole. Both options have common ground. The common ground is that registries should be linked by function. This means that the registries for tracing should be linked, and those for lawful civilian possession should also be linked. It is less convincing that registries held by a beneficiary for import/export controls need to be linked across the region, however, there should be data extraction that populates the lawful civilian possession registries as a minimum.

Project EFFECT, a major research project funded by the EU and conducted by Coventry University (United Kingdom), has proven, through scientific study and analysis of one of the regional beneficiaries, that properly networking the current registries and ballistic information systems will help to provide significant information to drive investigations and to solve cases.

This ground breaking research recommended a South East Europe Ballistics Information Network (SEEBIN) and the establishment of FFP. Linking of the beneficiaries' tracing databases should be undertaken in accordance with those recommendations, which will link with a wider international ballistics information network involving both the Europol and Interpol organisations. This will engage the beneficiaries more closely with the EU.

The linking of lawful civilian possession registries will first require a number of beneficiaries to complete their work to align exactly with the EU Firearms Directive as a prerequisite for any next step forward.

Linking the lawful civilian possession registries then gives a far better opportunity to provide an automated update of lost or stolen firearms to the Interpol illicit arms records and tracing management system (iARMS). Linking the test firing records from lost and stolen firearms will then facilitate any correlations against crime investigation ballistic findings. Test fires should be automatically compared with outstanding ballistic case files. If comparative work within the regional ballistic information network produces a positive

outcome against a test fire from the lawfully owned firearms registries, then the owning beneficiary will be able to identify the individual associated with that firearm.

The requirements of the protection of personal data will rightly prohibit the linking of personal records. There would not be a requirement to link sensitive case material other than anonymous ballistic identifications.

Details of lost, stolen and trafficked firearms would continue to be shared through iARMS, though this data should be automatically updated from the linked registries.

The two principle options for pursuing this are:

- A Hybrid option linking the current registry systems and maintaining them on their current operating arrangements with the addition of a separate data warehouse.
- The creation of a new regional registry system.

The Hybrid option would utilise only the existing registries of each beneficiary and maintain them on their current operating arrangements. This will mean that a significant number of bespoke, local, resolutions will be needed to facilitate the majority of beneficiaries in getting to a position where the linking of the registries can be effective. These are set out in the Final Report. This option will require a separate data warehouse for the merging of firearms-related data. This approach will be rather ad hoc and there is a risk that effective linking will not be achieved because local resourcing will not achieve data consistency and population.

The second option is that new registries are constructed so that there is complete consistency across the region, which will include linking. This has the significant advantage that the wide range of bespoke tasks that are necessary to achieve linking under the hybrid approach would no longer be relevant. For the lawful civilian possession registry all firearm descriptions and actual permits can then be modelled on the EU datasets and format. This option will provide automatic population of shared sections of the databases.

Following this option will facilitate informing threat and risk assessments (because a full range of compatible data will be available) and will inform further legislative developments, for example, the adoption of EU provisions for SALW deactivation standards. Ultimately this option is better preparation for EU membership.

For these reasons the recommended course of action would be to develop a new regional registry system.

Summary of Key Recommendations

Recommendation 1: Recommendation 1: As part of the deployment of any new firearms licencing and registry system, be it local, beneficiary or regional the associated administrative costs should be clearly defined in order to provide a potential baseline for a consistent regional fees structure that reflects the maintenance and administrative costs of the system.

Recommendation 2: The beneficiaries within the region should consider adopting legal test fire programmes. In all cases, the resulting ballistic material should be acquired onto the ballistics comparison systems associated with the proposed SEEBIN network(see below), the option to share those images on a regional basis should be discussed within the Regional SALW Commissions forum and the South East Europe Firearms expert Network (SEEFEN).

Recommendation 3: A regional good practice guide should be created in order to support a holistic approach to the initial assessment of an applicant's suitability to acquire / possess a firearm.

Recommendation 4: The creation of UNDP SEESAC Good Practice Guidance on operational procedures and techniques, standard background enquiry checks for applicants and standard descriptive terms for firearms and ammunition.

Recommendation 5: An assessment of the environmental impact relating to the destruction of SALW and ammunition within the region should be carried out in order to fully assess current procedures, as well as recommending possible 'cleaner' alternatives.

Recommendation 6: The beneficiaries within the region should move towards a full alignment with EU firearms controls, categorisation and legislation. This process should be facilitated and supported via the Regional SALW Commissions meetings and the SEEFEN platform.

Recommendation 7: Future consideration could be given to DNA sampling and/or fingerprinting of those involved in the lawful possession of weapons.

Recommendation 8: The beneficiaries, through the Regional SALW Commissions meetings, should work to establish a common agreement in relation to the permanent deacti-

vation of firearms. This should include what may be deactivated, who may possess it, the authority for possession, who conducts the deactivation, who inspects the deactivation and the standards to which the deactivation must conform. This process should also take into account the opportunities presented by a regional licencing and registry system as recommended above.

Recommendation 9: Creation of good practice and common standards guide in relation to the penalties attributed to the unlawful possession of deactivated firearms. This should be supported with prosecutorial information exchange through SEEFEN and other fora where appropriate.

Recommendation 10: The beneficiaries within the region should assess the opportunities to create test fire programmes for military and law enforcement firearms to assist investigations relating to any subsequent loss, and to complement other deterrent features against theft. In all cases, the resulting ballistic material should be acquired onto the ballistics comparison system of the beneficiary.

Recommendation 11: An interchange visits programme for registry staff is introduced on a regional basis.

Recommendation 12: The creation of a new, fully integrated, regional firearms licencing and registry system with a local data storage capability to hold the personal data of firearms licences.

Recommendation 13: The new regional firearms licencing and registry system should be connected with the proposed SEEBIN ballistics comparison network in order to reduce the duplication of data entry, further enhance regional cooperation, support crime detection, information analysis and data sharing.

Recommendation 14: A technical requirement study be carried out to build a detailed specification of the new regional system. This should also include a more detailed assessment of recently implemented firearms licencing systems in order to share experience, quickly refine technical specifications, and reduce the overall project risks.

Recommendation 15: The new regional firearms licencing and registry system should provide the basic functions of an integrated firearms licencing system as identified above. In addition, the associated implementation plan should include the back record conversion of existing data into the new system to reduce the burden of work on the beneficiaries during any transitional period.

Recommendation 16: A clear roadmap for completion for beneficiaries to complete their work to align with the EU Firearms Directive be in place before the implementation of new firearms licencing and registry system.



