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United Nations Arms Trade Treaty ATT Secretariat  
Avenue de France 23  
1202 Geneva  
Switzerland

Distinguished members of the Tenth Conference of States Parties (CSP10) to the Arms Trade Treaty,

I write to address urgent concerns regarding the increasing regulatory burden on legitimate arms manufacturers and brokers that are in a constant struggle to navigate the complex and ever-expanding requirements of the world's most heavily regulated industry. Yet, at global forums, even CSP10, there is predominant dialogue for even more regulation. Those voices pushing for more regulation claim, in most cases, to act in the interest of protecting "human rights," but instead of targeting illicit and criminal users, it is the belief of F.A.I.R. Trade Group that their crosshairs are fixed largely on lawful manufacturers and brokers. At the same time, these groups expect the very industry they target to be ready and able to contribute to the defense of helpless populations that are under attack. While we may share the sentiment of preventing human rights abuses, the current trajectory of regulatory dialogue threatens to undermine lawful business operations without effectively targeting illicit actors.

The proposed expansion of end-user culpability onto manufacturers is particularly concerning. It creates a ripple effect where not only are firearms manufacturers subjected to increased legal responsibility for the misuse of their products, but there's also a broader impact: financial institutions, transporters, and insurers are indiscriminately severing ties with firearms-related clients to avoid any risk of being implicated in potential "human rights crimes." This growing discrimination is harming legitimate businesses and individuals under the pretext of preventing supposed violations.



Our industry is already overwhelmed by regulation. To continue pushing the narrative that more is needed ignores the extensive vetting processes already in place by governments worldwide. This places an unreasonable burden on a sector already struggling under layers of oversight. The human rights concerns cited are generally isolated. Should these infrequent incidents dictate policy for an entire industry? If we applied this level of scrutiny universally, even the kitchenware industry would be at risk on account of specific areas with high knife-related violence.

It's time for a reality check. We need a rational approach that balances oversight with practicality.

If treaty signatories truly want to mandate firearms access to prevent human rights crimes, the focus should be on governmental vetting process, not the private sector. Governments have the authority to issue import and export licenses. Instead of adding more red tape for already compliant businesses, let's shift the responsibility back to governments and their policies to hold illicit actors accountable.

The arms industry plays a vital role in maintaining global security and protecting rights. Indeed, it is the arms produced by this industry that are used to facilitate interventions that protect some of the world's most vulnerable groups. Therefore, we need a nuanced approach that targets illicit activities without punishing responsible trade. Only through balanced and thoughtful dialogue can we achieve meaningful progress in both security and human rights protection worldwide.

Sincerely,

Charles Fowler

President of the Board  
F.A.I.R. Trade Group