

Firearms Marking

EU Directives 2021/555 & 2019/68
EU Regulation 2025/41

09.2025

Issue

Difficulty to have a single marking satisfying all 27 Member States' individual requirements because so far, this topic was governed by an EU Directive which allowed greater flexibility but led to **significant divergences within the EU**

Objective

Prevent illicit manufacturing of firearms from unmarked parts and increase the **traceability** of all firearms and essential components by imposing **common minimum technical specifications** across EU Member States

Key Takeaways

1. Font

- minimum size : 1,6mm
- minimum depth : 0,0762 mm
- alphabet : Latin, Cyrillic or Greek
- numeral system : Arabic or Roman

2. Non-metallic frame/receiver

- metal plate permanently embedded
- other techniques may be allowed by Member States

3. Content

- Name of manufacturer/brand
- Country/place of manufacture
- Serial number
- Year of manufacture
- Model
- Transferring entity (if government stock → civilian use)
- Country of import & Year of import

4. (Non-exhaustive) Examples of additional national requirements

- Estonia : letters need to be in capital
- Lithuania : font size cannot be larger than 2,5 mm
- Denmark : content needs to be marked in a specific order
- Italy : needs to be on a visible part (without tools needed)

Target Audience

- Applies to ALL firearms and ALL essential components of firearms
- **EU manufacturers** of firearms and/or essential components
- **EU importers** of firearms and/or essential components

Non-Compliant ?

- Cannot be placed on the EU market !
 - Sanction → Financial Fine
 - Sanction → Imprisonment
- E.g. Cyprus : <3y. prison and/or fine <5000€*
E.g. Lux : <3y. prison and/or fine <25.000€

Key Dates

- 17.01.20: minimum technical standards compulsory
- 22.07.25: minimum depth compulsory

To Do

- **Collect** information on the current markings of the firearms and essential components you import and/or manufacture in the EU
- **Perform a gap analysis** of what you do vs. what is required in each EU Member State
- **Raise awareness** amongst your staff
- **Inform** asap your non-EU suppliers to discuss and **implement the required changes**

Support

Non-exhaustive examples

- **D-Wise Strategy:** Cross-analysis & recommendation
- **D-Wise Consult:** what about transit within EU ? blocked by German customs & need help ?
- **D-Wise Implementation:** checklist of all relevant requirements for your suppliers ; summary table with all scenarios (public/private recipient ; EU/non-EU etc.)
- **D-Wise Academy:** on-site training or development of a dedicated e-Learning module
- **D-Wise News:** regulatory monitoring