**U.S. Gun Policy: Global Comparisons**

**BY COUNCIL ON FOREIGN RELATIONS**   *December 21, 2012 at 3:19 PM EDT*

**By Jonathan Masters, online writer/editor for the Council on Foreign Relations**

**Introduction**

The debate over gun control in the United States has waxed and waned over the years, stirred by a series of incidents involving mass killings by gunmen in civilian settings.

The killing of 20 schoolchildren in Newtown, Ct. in December 2012 prompted a national discussion over gun laws and initial calls by the Obama administration to limit the availability of military-style assault weapons.

Gun ownership in the United States far surpasses other countries, and the recent mass shootings, in particular, have raised comparisons with policies abroad. Democracies that have experienced similar traumatic shooting incidents, for instance, have taken significant steps to regulate gun ownership and restrict assault weapons. They generally experience far fewer incidents of gun violence than the United States.

**United States**

The Second Amendment of the U.S. Constitution states: “A well-regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.” Supreme Court rulings, citing this amendment, have upheld the right of states to regulate firearms. However, in a 2008 decision confirming an individual right to keep and bear arms, the court struck down Washington DC laws that banned handguns and required those in the home to be locked or disassembled.

A number of gun ownership advocates consider it a birthright and an essential part of the nation’s heritage. The United States, with less than 5 percent of the world’s population, has about 35-50 percent of the [world’s civilian-owned guns](http://www.smallarmssurvey.org/publications/by-type/yearbook/small-arms-survey-2007.html), according to a 2007 report by the Swiss-based Small Arms Survey. It ranks number one in firearms per capita. The U.S. also has the highest homicide-by-firearm rate among the world’s most developed nations (OECD), though some analysts say these statistics do not necessarily have a cause-and-effect relationship.

Federal law sets the minimum standards for firearm regulation in the United States; however individual states have their own laws, some of which provide further restrictions, others which have more lenient guidelines.

The Gun Control Act of 1968 prohibited the sale of firearms to several categories of individuals, including persons under eighteen-years of age, those with criminal records, the mentally disabled, unlawful aliens, dishonorably discharged military personnel, and others. In 1993, the law was amended by the Brady Handgun Violence Prevention Act, which mandated background checks for all unlicensed persons purchasing a firearm from a federally licensed dealer.

However, critics maintain that a so-called “gun show loophole,” codified in the Firearm Owners Protection Act of 1986, effectively allows anyone, including convicted felons, to purchase firearms without a background check.

As of December 2012, there were no federal laws banning semi-automatic assault weapons, military-style .50 caliber rifles, handguns, or large capacity ammunition magazines, which can increase the potential lethality of a given firearm. There was a federal prohibition on assault weapons and high-capacity magazines between 1994 and 2004, but Congress allowed these restrictions to expire.

**Canada**

Many analysts characterize Canada’s gun laws as strict in comparison to the United States, while others say recent developments have eroded safeguards. Ottawa, like Washington, sets federal gun restrictions that the provinces, territories, and municipalities can supplement. Federal regulations require all gun owners, who must be at least eighteen-years of age, to obtain a license that includes a background check and a public safety course.

There are three classes of weapons: non-restricted (ordinary rifles and shotguns), restricted (handguns, semi-auto rifles/shotguns, sawed-offs), and prohibited (fully automatics, etc.). A person wishing to acquire a restricted firearm must obtain a federal registration certificate, according to the Royal Canadian Mounted Police.

Modern Canadian gun laws have also been driven by prior gun violence. In December 1989, a disgruntled student walked into a Montreal engineering school with a semi-automatic rifle and killed fourteen students and injured over a dozen others. The incident is widely credited with driving subsequent gun legislation, including the 1995 Firearms Act, which required owner licensing, the registration of all long-guns (rifles and shotguns), while banning more than half of all registered guns. However, in 2012, the government abandoned the long-gun registry, citing cost concerns.

**Australia**

The inflection point for modern gun control in Australia was the Port Arthur massacre of April 1996, when a young man killed thirty-five people and wounded twenty-three others. The rampage, perpetrated with a semi-automatic rifle, was the worst mass shooting in the nation’s history. Less than two weeks later, the conservative-led national government pushed through fundamental changes to the country’s gun laws in cooperation with the various states, which regulate firearms.

The National Agreement on Firearms all but prohibited automatic and semi-automatic assault rifles, stiffened licensing and ownership rules, and instituted a temporary gun buyback program that took some 650,000 (or about one-sixth of the national stock) assault weapons out of public circulation. Among other things, the law also required licensees to demonstrate a “genuine need” for a particular type of gun, and take a firearm safety course. After another high-profile shooting in Melbourne in 2002, Australia’s handgun laws were tightened as well.

Many analysts say these measures have been highly effective, citing declining gun-death rates, and the fact that there have been no mass killings in Australia since 1996. Many also suggest the policy response in the wake of Port Arthur could serve as a model for the United States.

**Israel**

Military service is compulsory in Israel and guns are very much a part of everyday life. By law, most eighteen-year olds are drafted, psychologically screened, and receive at least some weapons training after high school. After serving typically two or three years in the armed forces, however, most Israelis are discharged and must abide by civilian gun laws.

The country has relatively strict gun regulations, including an assault weapons ban and a requirement to register ownership with the government. To become licensed, an applicant must be an Israeli citizen or a permanent resident, be at least twenty-one-years-old, and speak at least some Hebrew, among other qualifications. Notably, a person must also show genuine cause to carry a firearm, such as for self-defense or hunting.

However, some critics question the efficacy of these measures. “It doesn’t take much of an expert to realize that these restrictions, in and of themselves, do not constitute much by the way of gun control,” writes Liel Leibovitz for the Jewish magazine Tablet. He notes the relative ease with which someone can justify owning a gun, including residing in an Israeli settlement, employment as a security guard, or working with valuables or large sums of money. Furthermore, he explains that, in at least one respect, almost the entire population has indirect access to an assault weapon by either being a soldier, a reservist, or a relative. Israel’s relatively low gun-related homicide rate is a product of the country’s unique “gun culture,” he says.

**United Kingdom**

Modern gun control efforts in the United Kingdom have been precipitated by extraordinary acts of violence that sparked public outrage and, eventually, political action. In August 1987, a lone gunman armed with two legally-owned semi-automatic rifles and a handgun went on a six-hour shooting spree roughly seventy miles west of London, killing sixteen people and then himself. In the wake of the incident, known as the Hungerford Massacre, Britain introduced the Firearms (Amendment) Act, which expanded the list of banned weapons, including certain semi-automatic rifles, and increased registration requirements for other weapons.

Another gun-related tragedy in the Scottish town of Dunblane, in 1996, prompted Britain’s strictest gun laws yet. In March of that year, a middle-aged man armed with four legally purchased handguns shot and killed sixteen young schoolchildren and one adult, before committing suicide, in the country’s worst mass shooting to date. The incident sparked a public campaign known as the Snowdrop Petition, which helped drive legislation banning all handguns with few exceptions. The government also instituted a temporary gun buyback program, which many credit with taking tens of thousands of illegal or unwanted guns out of supply.

However, the effectiveness of Britain’s gun laws in gun-crime reduction over the last twenty-five years has stirred ongoing debate. Analysts note that the number of such crimes grew heavily in the late 1990’s and peaked in 2004, before falling each subsequent year. “While tighter gun control removes risk on an incremental basis,” said Peter Squires, a Brighton University criminologist speaking to CNN, “significant numbers of weapons remain in Britain.”

**Norway**

Gun control had rarely been much of a political issue in Norway–where gun laws are viewed as tough, but ownership rates are high–until right-wing extremist Anders Behring Breivik killed seventy-seven people in an attack on an island summer camp in July 2011. Though Norway ranked tenth worldwide in gun ownership, according to the Small Arms Survey, it placed near the bottom in gun-homicide rates. (The U.S. rate is roughly sixty-four times higher.) Most Norwegian police (much like the British) do not carry firearms.

In the wake of the tragedy, some analysts in the United States have cited Breivik’s rampage as proof that strict gun laws–which in Norway include requiring applicants to be at least eighteen-years of age, specify a “valid reason” for gun ownership, and obtain a government license–are ineffective. “Those who are willing to break the laws against murder do not care about the [regulation of firearms](http://www.nationalreview.com/articles/272787/norway-and-gun-control-charlie-cooke), and will get a hold of weapons whether doing so is legal or not,” wrote Charles C. W. Cooke in the National Review. Other gun control critics have argued that had other Norwegians, including the police, been armed, Breivik might have been stopped earlier and killed fewer victims. An independent commission after the massacre recommended tightening Norway’s gun restrictions in a number of ways, including a prohibition of pistols and semi-automatic weapons.

**Japan**

Gun control advocates regularly cite Japan’s highly restrictive firearm regulations in tandem with its extraordinarily low gun-homicide rate, which is the lowest in the world at 1 in 10 million, according to the latest data available. Most guns are illegal in the country and ownership rates, which are quite small, reflect this.

Under Japan’s Firearm and Sword Law, the only guns permitted are shotguns, air guns, guns that have research or industrial purposes, or those used for competitions. However, before access to these specialty weapons is granted, one must obtain formal instruction, pass a battery of tests (written, mental, and drug), and a rigorous background check. Furthermore, owners must inform the authorities of how the weapon and ammunition is stored, and provide the firearm for annual inspection.

Some analysts link Japan’s aversion to firearms with its demilitarization in the aftermath of World War II. Others say that because the overall crime rate in the country is so low, most Japanese see no need for firearms.

This backgrounder was [*originally published by the Council on Foreign Relations*](http://www.cfr.org/united-states/us-gun-policy-global-comparisons/p29735?cid=nlc-public-the_world_this_week-link4-20121221?cid=otr-partner_site-pbs_newshour). We’ll have more on gun policy on Friday’s NewsHour.