

United States Senate

WASHINGTON, DC 20510

August 4, 2026

ATF Rulemaking Comments
Mail Stop 6N-518
Office of Regulatory Affairs
Enforcement Programs and Services
Bureau of Alcohol, Tobacco, Firearms and Explosives
United States Department of Justice
99 New York Avenue NE
Washington, DC 20226

Attention: ATTN: RIN 1140-AA97

Re: Notice of Proposed Rulemaking: Importing Training Rounds

On June 23, 2025, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) published its Notice of Proposed Rulemaking (NPRM), RIN 1140-AA97, that purports to make training rounds exempt from the definition of “ammunition” and thereby exempt them from certain import restrictions.¹ For the reasons below, we submit this comment in opposition to the rule as written. The proposed rule violates the statute,² runs contrary to decades of ATF interpretation, and seemingly advantages foreign importers, potentially displacing U.S. employers and workers. The proposed rule should be withdrawn in its entirety.

The Gun Control Act of 1968 (GCA) defines “ammunition” as “ammunition or cartridge cases, primers, bullets, or propellant powder designed for use in any firearm.”³ This definition is unambiguous and includes any round that contains these components and is “designed for use in any firearm,” but notably does not examine the purpose of the ammunition but rather takes a component-specific approach to the definition. Training rounds are cartridges used in law enforcement and military simulation training that typically consist of cartridge cases, primers, bullets, and propellant powder. Nevertheless, training rounds contain all the identified components of “ammunition” as defined in the GCA and should be treated as such.

¹ Bureau of Alcohol, Tobacco, Firearms and Explosives. “*Importing Training Rounds.*” *Federal Register*, vol. 91, no. 87, 6 May 2026, pp. 24400-24408,

<https://www.federalregister.gov/documents/2026/05/06/2026-08914/importing-training-rounds>.

² 18 U.S.C. § 925(d)

³ 18 U.S.C. § 921(a)(17)(A)

The proposed rule, however, would do the opposite: it would amend the regulatory definition of “ammunition” to *exclude* “training rounds” based on their purpose, i.e., not designed for offensive or defensive combat, and not to be used in a device that is a weapon. This purpose test is not consistent with the plain meaning and intent of the statute. If ATF wants to exempt certain training rounds from federal ammunition regulations, it should ask Congress to create an exception, not engage in magical thinking and attempt to rewrite the statute through regulatory changes.

Until this administration, ATF had historically treated training rounds as ammunition, requiring that they be imported pursuant to ATF Form 6, the same process required for conventional ammunition. ATF maintained this interpretation consistently until June 23, 2025, when ATF Ruling 2025-2 reversed course.⁴ Prior to that reversal, ATF’s position, consistent with the law, resulted in a general prohibition on importing training rounds without completing and submitting ATF import forms. With this proposed rule, ATF now seeks to reverse its longstanding position in a manner that runs contrary to the statute. ATF’s new view is that training rounds do not meet the definition of “ammunition” because they are “designed for use in” training guns, not that they fail to contain the specified components as the statute requires. ATF’s argument stems from the belief that training guns are themselves not classified as “firearms” under the GCA. On this reasoning, ATF concludes that training rounds fall outside the definition of “ammunition” entirely, and that federally licensed importers may therefore import them without ATF import permits and sell them for commercial, retail, and law enforcement training purposes even though they meet the definition of “ammunition.”

ATF’s proposed reinterpretation rests on an argument that does not hold up. As noted above, the GCA defines “ammunition” as cartridge cases, primers, bullets, or propellant powder “designed for use in any firearm.” ATF’s new theory is that the phrase “designed for use in any firearm” modifies the entire list of components that constitute ammunition. This means that a round containing those components is only ammunition if the round itself is designed to be fired from a firearm as defined by the GCA. But that is not how the GCA defines ammunition.

Moreover, ATF’s new interpretation would allow any manufacturer or importer to sidestep the “ammunition” definition simply by marketing a component-identical round for use in a device labeled as a “training gun” rather than a firearm, even if that device is not functionally different from a conventional firearm. That cannot be what Congress intended when it enacted the GCA. Many “training” firearms today are conventional weapons that have been converted to fire Simunition or UTM rounds, but they are still firearms by law and can easily be restored to firing conventional ammunition.⁵ ATF’s responsibility is to enforce the laws Congress enacted, not to aid the industry to bypass the law it finds inconvenient.

⁴ United States, Bureau of Alcohol, Tobacco, Firearms and Explosives. *ATF Ruling 20-25-2: Importing Training Rounds*. 23 June 2025, <https://www.atf.gov/media/19186/download>.

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“<https://simunition.com/conversion-kits/>.”

Lastly, the proposed rule frames this reclassification as a technical correction. In practice, its principal effect would be economic: removing import restrictions on training rounds would allow manufacturers to import foreign training rounds into the United States without ATF oversight and at a significant price advantage over domestic producers. The proposed rule would undoubtedly result in the displacement of American manufacturers and American jobs, which seems contrary to the stated positions of the administration. Cheaper foreign-manufactured training rounds, now freely importable under the ATF's new rule, would compete in price in a market where domestic manufacturers operate at higher production costs, ultimately displacing American manufacturers and jobs.

For these reasons, we ask the ATF to withdraw this flawed proposal.

Sincerely,



Christopher S. Murphy
United States Senator



Adam B. Schiff
United States Senator



Richard Blumenthal
United States Senator