



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Office of the Director

Washington, DC 20226

ATF Ruling 2025-2

Importing Training Rounds

18 U.S.C. § 921(a)(3):	DEFINITIONS (FIREARM)
18 U.S.C. § 921(a)(17)(A):	DEFINITIONS (AMMUNITION)
18 U.S.C. § 921(a)(4):	DEFINITIONS (DESTRUCTIVE DEVICE)
18 U.S.C. § 922(l):	IMPORTATION OF FIREARMS AND AMMUNITION
27 CFR 447.11:	DEFINITION (FIREARMS)

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) authorizes the importation of certain marking rounds ("training rounds") because these training rounds do not meet the definition of "ammunition" as defined by the Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(17)(A). These items are not designed for offensive and defensive combat and are not "designed for use in any firearm." Similarly, training rounds are not regulated by the Arms Export Control Act (AECA) because they are not designed for use in any "firearm" as defined in the permanent importation regulations implementing that statute. An importer of training rounds that are not designed for use in any firearm may import the rounds without submitting an ATF Form 6, Application and Permit for Importation of Firearms, Ammunition and Implements of War (Form 5330.3A). Note, however, less-than-lethal ammunition, which is distinct from training rounds, is generally considered ammunition. This Ruling only applies to training rounds that are not designed for use in any firearm.

Background

ATF has received numerous inquiries from regulated firearms industry members about importing training rounds that contain ammunition components such as cartridge cases, primers, or propellant powder. However, these training rounds do not function in conventional firearms. Instead, they are designed to be fired from specially adapted training guns, which usually consist of a conversion kit (including special slide or bolt, barrel, or assembly and other components) that is placed on the firearm frame or receiver. These rounds are not "ammunition" because they are not designed to be fired from a "firearm" as defined in the GCA.

Discussion

The GCA defines “ammunition” as “ammunition or cartridge cases, primers, bullets, or propellant powder designed for use in any firearm.” 18 U.S.C. § 921(a)(17)(A). Although training rounds consist of cartridge cases, primers, propellant powder, and projectiles, the critical question in determining whether they are “ammunition” under the statute is, whether they are “designed for use in any firearm.”

The GCA defines a “firearm” as:

(A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) the frame or receiver of any such weapon; (C) any firearm muffler or firearm silencer; or (D) any destructive device. Such term does not include an antique firearm.

18 U.S.C. § 921(a)(3).

The statutory definition of “ammunition” includes the element that components are “for use in any firearm,” and primarily refers to weapons covered by subparagraph (A): those weapons that are “designed to or may readily be converted to expel a projectile by the action of an explosive.” Congress also included starter guns “which will...or may be readily converted to expel a projectile by the action of an explosive.” 18 U.S.C. § 921(a)(3). This provision prevented evasion of the GCA by regulating weapons that could be converted into fully functioning firearms by “boring a hole through an obstruction in the barrel,” “substitution of a barrel,” or some other ready means of “conver[sion] to fire a projectile.” Federal Firearms Amendments of 1966, S. Rep. 1866, 89th Cong., at 73 (explaining earlier congressional proposal).

Under both the GCA and AECA, a “firearm” is a type of weapon. 18 U.S.C. § 921(a)(3); 27 CFR 447.11. Although “weapon” is not defined by the GCA or AECA, the Supreme Court has held that a weapon is “an instrument of offensive or defensive combat.” *Bondi v. VanDerStok*, 145 S. Ct. 857, 868 (2025).

The devices that fire training rounds are not “weapons” within the meaning of the GCA or the AECA. These devices are designed to work only with training rounds that have no value for offensive or defensive combat. When discharged, the cartridges produce low-energy projectiles that are designed to provide immediate feedback to a trainee. These projectiles are not intended to cause death or serious bodily injury, nor will they likely cause such injury when used with proper safety equipment. Because they are low-energy, the projectiles are also ineffective as “less-than-lethal” ammunition in riot control situations, unlike bean bag rounds and rubber pellets that are used in weapons for nonlethal riot control. Given that these training rounds are not useful for employing deadly or non-deadly force, they are not designed for use in weapons that are instruments of offensive or defensive combat.

The training rounds are also not for use in unmodified firearms. The cartridges have insufficient propellant powder to cycle a firearm’s bolt. The rounds are also not reloadable. Contained within the cartridge case is a plastic piston that, when removed, would significantly weaken and damage

the casing so the training round cannot be reloaded (i.e., altered to be lethal or less-than-lethal ammunition) without being destroyed.

In addition, the training guns have alterations designed to make them incapable of firing ordinary firearm ammunition. The conversion kits used in training guns are specifically designed so that the gun can function only with a training round that has significantly less propellant powder than conventional firearm ammunition. Because training guns use special conversion kits, the training round can safely and effectively cycle the conversion kit bolt. They are also designed with additional safety features including offset firing pins to ensure they are capable of firing only training rounds, and not traditional centerfire cartridges (i.e., conventional firearm ammunition).

Nor does the fact that some training guns have a firearm frame as a component make the training rounds “ammunition” under the GCA. The GCA regulates frames or receivers as statutory “firearms.” 18 U.S.C. § 921(a)(3)(B). But the GCA does this because they are the essential component parts of completed weapons, not because they are independently capable of expelling projectiles. The mere fact that a training gun includes a component regulated as a statutory “firearm” does not transform the training gun into a weapon capable of using ammunition as set out in section 921(a)(17)(A).¹

In sum, the training rounds that fall within the scope of this ruling are designed to be used with either a training gun or a device using a conversion kit, which consists of a conversion bolt, bolt carrier assembly, and other parts (depending on the model) that replace the vital functional components of a weapon. Training ammunition that is designed to operate in a weapon is not covered by this ruling.

Held, a fully assembled training round that is not designed for offensive or defensive combat (i.e., anti-personnel) and is not for use in a weapon that expels a projectile by the action of an explosive is not ammunition as defined by 18 U.S.C. § 921(a)(17)(A).

Held further, as a fully assembled training round does not constitute “ammunition” under the permanent importation provisions of the AECA, importers do not need to complete an ATF Form 6 under 27 CFR part 478 to bring training rounds into the United States.

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Robert Cekada,
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¹ When a training device includes a firearm “frame” or “receiver,” that frame or receiver remains subject to all provisions of the Gun Control Act, whether or not it is attached to a training device.