

# ATF Removes Restrictions on Imports of Simunition Training Rounds

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The Bureau of Alcohol, Tobacco, and Explosives (ATF) has removed restrictions on the importation of non-lethal marking rounds (also known as “training rounds” or “simunition rounds”). The move is expected to remove administrative barriers for the industry and better facilitate realistic firearms training across the country.

## *Background*

Military, law enforcement, and civilian trainers frequently use non-lethal marking/paint rounds for realistic force-on-force exercises. These rounds typically contain standard ammunition components (a cartridge case, primer, propellant, and projectile) but are engineered to fire only in specially modified firearms or dedicated training devices. They fire low-velocity projectiles, often containing paint or dye markers, that allow trainees to engage in dynamic, realistic training with minimal risk. Under the previous Administration, ATF treated many powder-charged training rounds as regulated “ammunition,” effectively banning their importation for civilian use.

## *The New Ruling*

On June 23, 2025, ATF released Ruling 2025-2, which removes previous restrictions on the importation of certain training rounds. This ruling effectively concludes that certain training rounds – when used exclusively with “specially adapted training guns” or “conversion kits” – do not qualify as “ammunition” under the Gun Control Act (GCA) (18 U.S.C. § 921(a)(17)(A)) or as regulated arms under the Arms Export Control Act (AECA) (27 CFR § 447.11).

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The ruling authorizes importation of qualifying training rounds on the basis that they “are not designed for offensive and defensive combat and are not ‘designed for use in any firearm.’”

At the heart of Ruling 2025-2 is a close reading of the GCA’s definitions of “ammunition” and “firearm.” The GCA defines “ammunition” under 18 U.S.C. § 921(a)(17)(A) as “ammunition or cartridge cases, primers, bullets, or propellant powder designed for use in any firearm.” Under this definition, the intent of a cartridge, as evidenced by its design, is critical. So even while training rounds contain the physical components of cartridges, the inquiry turns on whether the rounds are “designed for use in any firearm.” The term “firearm,” in turn, is defined under 18 U.S.C. § 921(a)(3) to include:

(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.

Notably, this definition hinges on the concept of a “weapon” – a word not explicitly defined in the statutes. Ruling 2025-2 draws from a recent Supreme Court decision (*Bondi v. VanDerStok*, 145 S. Ct. 857, 868 (2025)) for guidance, noting that the Court has defined a weapon as “an instrument of offensive or defensive combat.” As the devices that shoot training rounds are not suitable for use in offensive or defensive combat, they do not meet the definition of either “weapon” or “firearm” under the statutes. And since the training rounds at issue only function in these specialized devices, it follows that they cannot be considered “ammunition” under the GCA or the AECA. The ruling further explains that “[t]hese projectiles are not intended to cause death or serious bodily injury, nor will they likely cause such injury when used with proper safety equipment.” Moreover, the agency reasoned that training rounds are also incapable of cycling a firearm’s bolt, and cannot be reloaded due to the fragile internal components contained within each round.

Importantly, ATF’s ruling distinguishes between training/simunition rounds and less-than-lethal ammunition – rubber or plastic projectiles often used for riot control. It notes that “less-than-lethal ammunition, which is distinct from training rounds, is generally considered ammunition.” With regard to conversion kits that modify existing firearms for firing simunition rounds, ATF cautions that “[w]hen 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.”

### Takeaways

ATF’s recent ruling provides welcome clarification to industry stakeholders and aligns the law with the wide application of non-lethal training munitions. By interpreting “ammunition” in light of a cartridge’s intended use and the nature of the device firing it, the agency acknowledges that a round designed solely for a non-weapon training tool is fundamentally different from live ammunition. Importers and firearms businesses now have clear guidance that “training rounds” of the type described – fully assembled, non-reloadable marking cartridges for specialty conversion guns – are not regulated as ammunition under the GCA or AECA.

Importers may now import qualifying training rounds without submitting an ATF Form 6 Application and Permit for Importation of Firearms, Ammunition and Implements of War (Form 5330.3A). Practically speaking, importers of qualifying training rounds will no longer need to submit paperwork to, or receive approval from, ATF prior to importation.

The ruling enables more accessible and cost-effective training opportunities, while still preserving the distinction that munitions meant for actual weapons remain tightly controlled. Going forward, the decision is expected to streamline training operations across the firearms industry, particularly for civilian training programs using nonlethal simulation tools.

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