

Sub #	Name	Comment
1	Joe Green	<p>I have highlighted two bits you may want to look at - both use the term 'appropriately' - I know from my training and assessment background that this term is wide open to interpretation. I suggest replacing it with the actual specification or expectation. Leave this gap and some vetter (or friendly arms officer) will try to drive a bus through it!</p> <p>Regarding a dog as being extra security (p?). From an operational policing perspective I'm not sure this deters criminals.</p> <p>A comment about the phrase 'A category'. There used to be a legal definition of a firearm 'in sporting configuration' - this is the origin of the term A cat. It is common parlance, but perhaps for those not in the field an explanation such as 'A category refers to firearms, the possession of which is not subject to an endorsement or permit to procure'.</p>
2	Name withheld	<p>Maybe I am being a little pedantic when I note that Reg 19(1) c states "<i>the holder shall take <b>reasonable steps</b> to ensure that any firearm in the holders possession is secured against theft</i>" - while the proposed policy states "<i>The Police will assess storage against the three matters covered in regulation 19(1) (....) "<b>Preventing the theft of firearms...</b>"</i>"</p> <p>There is a quantum leap between 'reasonable steps' (the current law) .. and 'preventing'. IMO that point could be changed to read something like: - '<i>Confirm that the holder has taken reasonable steps to ensure the method of storage protects against theft - at all times</i>'</p> <p>It would be unfortunate if Police re-interpreted the storage laws rather than Parliament changing them via the regulations.</p> <p>I am a believer in alarms and security cameras and while you are likely aware of the Chinese sites that sell just about everything you might like to search AliExpress 'wireless security cameras' section - Even dummy cameras could be a cheap deterrent. FYI I also see registration as a serious deterrent against theft - and also against poor storage habits.</p>
3	Jean De Villiers	<p>My comment pertains to the nominated thickness for steel cabinets for A cat firearms.</p>

		<p>The vast majority of commercially available steel cabinets have a steel thickness for the walls of 2mm. The door may be of thicker gauge.</p> <p>The statement of additional bracing is vague. Where the joints have been fully welded and the cabinet fixed on two planes, no significant flexing on the shell is possible. Would this be considered adequate bracing or is there a measurable loading value to be applied that can be consistently applied?</p> <p>In comparison with the hinge of 3mm, the hinge wings are much less than 3mm thick (about 1.5mm). Hinges and locks will always be the weakest point, and therefore the structure around these is where the focus should be to protect against buckling and deformation. The frame could be folded as suggested or of additional material, independently assessed from the cabinet wall thickness.</p> <p>Please consider commercially available rifle cabinets without the need for additional superfluous amendments. My example comes from commercially available cabinets deemed to comply with British standards.</p>
4	Welsh Family	<p>“Approved in writing by Police” (p?) – concern is the consistent application of the approval process and use of Police discretion, there should be no undeclared additional things like an engineer’s certification or approved brands. Relief sought: That there be a written schedule of requirements and that Police discretion over the approval be limited to this schedule. This should enable national consistency in approvals with no Regional discretion or variation.</p> <p>Rationale: The overt declaration of the criteria/requirements will provide consistency, certainty and clarity for all.</p> <ul style="list-style-type: none"> <li>• <u>“Any door handle fitted to be designed to break off under leverage. If the door handle is not designed to break off under leverage, the handle to operate the locking mechanism through a clutch system designed to slip before causing the lock to fail.”</u> I wonder how practicable this is with existing approved safes. On the surface it appears reasonable but if you cannot show or prove this capability you may well be required to do so, at your expense, for Police approval. This could be a convenient way to make a lot of safes fail the approval. The implications are unfair and unreasonable.</li> </ul> <p>Relief sought: That any requirements for break off door handles or any designed slip system on the lock be removed. Rationale:</p>

		<p>(1). These requirements are not readily demonstrable to vetters (particularly on existing installed and approved systems) and would likely require assessment by appropriately qualified and vetted people.</p> <p>(2). It is also unlikely that a broken handle or lock will be a significant barrier to burglars who have modern portable power tools – the efficacy of this proposed requirement is at best dubious</p> <p>(3). This proposed requirement may render many safes non-compliant and frustrate approval. This requirement is therefore unfair, unreasonable and has no estimation of costs, remedies, standard of evidence or how many potentially affected parties may have their current lawful status prejudiced.</p> <ul style="list-style-type: none"> <li>• <u>As this will be a Police approval, will warranted officers or sub contactors be used? Concerns over security of the information from the inspection and who does it still remain. For me, Police vetted and approved personnel with Police security over any information is a bottom line.</u></li> </ul> <p>Relief sought: That all people working in the approval system are subject to Police vetting/security clearance and that all information is subject to Privacy Act considerations. Rationale: Security of sensitive private information around dwellings and firearm/ownership and security is a bottom line</p> <ul style="list-style-type: none"> <li>• <u>No schedule of charges – I can't imagine this is covered by the current fee system</u></li> </ul> <p>Relief sought: That a schedule of costs accompany any proposals. Rationale: It is unfair and unreasonable to consult without any indication of costs to individuals arising from the approval process.</p> <ul style="list-style-type: none"> <li>• <u>No mention is made of existing approved C, B and E arrangements. Will approvals be grand-parented or asked for as if from new?</u></li> </ul> <p>Relief sought: That existing approvals are grand parented. Rationale: There is not a great deal of significant change on safes proposed other than handle /lock arrangements. The imposition of additional unspecified costs and constraints for little or no significant level of additional security is both unfair and unreasonable</p>
5	Mike Loder	<p>This submitter repeated the phrase “Stop inventing the law” 8 times.</p> <p>Other points were</p>

		<ol style="list-style-type: none"> <li>1. How will a bigger safe stop thugs with knives demanding that owners open them? Like the incident last Thursday? Target criminals and this becomes academic.</li> <li>2. .</li> <li>3. Your definitions do nothing to clarify law.</li> <li>4. .</li> <li>5. Why must a box be fixed to more than one surface? Landlords are then even less likely to allow it.</li> <li>6. None of this is needed. At all.</li> <li>7. .</li> <li>8. You cannot ignore every point made by knowledgeable shooters by saying 'Out of the scope of our inquiry'.</li> <li>9. .</li> <li>10. Do you want ammo in a \$3000 safe or a cupboard? There is no reason to store it separately.</li> <li>11. Bolts get lost when stored separately.</li> <li>12. .</li> <li>13. You already lost 25000 shooters when you [expletive deleted] with law last time. Make more stupid changes and see it happen again.</li> <li>14. .</li> </ol>
6	Chris Mounter	<p>I believe our laws regarding security are sufficient. However in order to be more effective I think both the community and police would benefit from the following:</p> <p>Make it a top priority call out for reports of break-ins at addresses associated with firearms Licence holders. Also Reduce the response time for these call outs.</p> <p>Secondary security system such as steel cable thru the trigger guards and secured to the floor or wall via an eye bolt thru the sides of the safe.</p> <p>Introduce a personal firearms log book issued to all license holders for the purpose of maintaining firearms details and serial numbers, requiring license holders to maintain said log book.</p> <p>Visual inspection to make sure firearms are recorded but without the need for a 3rd party (e.g. the police) to keep details themselves. Could be mandatory or voluntary.</p>

7	Clarrie Ross	<p>It is with absolute dismay that I see once again the Police are wasting time and money even contemplating any new Firearms storage laws. Apart from this being unlawful it is an absolute farce and just trying to pass the buck onto law abiding owners, to make up for their inability to deal with the problem, if they actually bothered to turn up at many of the crime scenes where firearms are involved they may actually get above the 8% of convictions they state. Maybe they could best use their time pushing the courts for much stronger penalties for firearm theft, when in a lot of cases a slap on the wrist is all they get. Get of your butts and start prosecuting the ones who do the crime, not us law abiding kiwis. While I'm on this issue, please tell me what happened to all those gang members that had firearms?</p>
8	Alec Whatmough	<p>I firstly wish to acknowledge the good moves made pursuant to the feedback relating to the two previous drafts, in particular (<a href="#">paragraph .21 in the report</a>) <i>"there was no intention to rewrite the Arms Act or Regulations. The document has been re-written to remove the impression that the recommended best practices constitute legal requirements."</i></p> <p>However, the impression remains that writing the rules is exactly what Police are still trying to do, and I believe that this is largely due to the document title incorporating the word <i>Requirements</i>.</p> <p>The document would be better served if <i>requirements</i> were to be replaced with <i>Guidelines</i>, <i>Recommendations</i>, or <i>Best Practice</i>. Indeed, c.31 states exactly this</p> <p><i>The sub-committee reiterates that the document is not intended to constitute any departure from existing legislative requirements on firearm licence holders, but is a guide to best practice for them to follow.</i></p> <p>Perhaps a good title would be <i>"New Zealand Police Best Practice Guidelines for the Safe Storage of Firearms"</i>.</p> <p>Windows of Buildings I previously submitted in relation to security for endorsed firearms:</p> <p><i>Why do Police not accept louvre windows? If security grilles are fitted as required to all windows and skylights, the type of window fitting can be of no consequence as entry will be difficult in all cases. I cannot imagine why anyone would want louvre windows in a gun room, but to ban them is illogical.</i></p>

		<p>The <a href="#">summary of submissions</a> appears to have overlooked this point. I therefore re-submit that this sentence should be removed; if windows are effectively barred/grilled, then whether that window is a solid pane, sash or louvre makes no difference to the level of security offered. As regulation 28 makes no mention of types of window, for Police to not accept the installation of louvre windows has no legal basis.</p> <p>Finally, I wish to thankfully acknowledge that my previous submission was actually read, as proven by the fact that I have been quoted a number of times in the summary. It is good to know that we are actually being listened to, contrary to what the masses would suggest as being likely.</p>
9	Gareth Williams	<p>My submission is as follows: While some of these changes make sense and those responsible for this document are to be congratulated, others do not.</p> <p>1. Why limit the construction of Lockable Cabinets etc for A-Cat weapons to just only plywood? Why not add a comment that other suitable material with an appropriate strength would be acceptable. I.e. give the inspecting officer some latitude.</p> <p>Under the “Security for Endorsed Firearms”</p> <p>2. In relation to a Steel Safe etc, for the Police to be able to “approve” whether a steel safe, box or cabinet is acceptable, the Police would need to have an engineering degree. If a suitably qualified Chartered Professional Engineer states in writing that the safe is adequate, then the Police should accept such certification unless they can prove otherwise.</p> <p>3. In relation to the “Rooms of Stout and Secure Construction”, there needs to be further clarification of the term “structurally sound” and who is to make that determination (it is acknowledged that this wording is in the regulations currently, but even so it should be revised). The person who makes the determination as to whether the structure is “sound” should be a Chartered Professional Engineer (Structural), and not Police, (unless they have a Structural Engineering degree).</p> <p>4. Regarding Monitored Alarms. While in essence this is a good idea, there are a number of issues with this. For those living in the country and away from the metropolitan areas, response to alarms by security companies is often slow and given that there could be firearms being stolen, should the Police be asking members of the public to put themselves into harm’s way? Also what is the response of Police to a call from a monitoring company? Personal experience is</p>

		that Police would not respond to a call from a monitoring company unless a neighbour also made a call that the alarm had been activated. For a country property, neighbours might be situated too far away to hear the alarm.
10	Peter Linton	<p><i>1st Recommendation:</i> Page 10 should be amended to: Steel Safes, Boxes or Cabinets</p> <ol style="list-style-type: none"> <li>1. Be of sound Construction</li> <li>2. Bolted or securely fastened to the building within which the pistol, MSSA or restricted weapon is kept</li> <li>3. Construction shall be as listed below. NB: It should not be necessary for the police to approve each storage safe, cabinet or box in writing. If a container meets the required construction, it should automatically qualify as acceptable storage. The requirement to approve in writing can lead to a huge amount of wasted time &amp; money by all parties. This time &amp; money could be better spent elsewhere.</li> </ol> <p><i>2nd Recommendation:</i> This clause should be expanded to treat the handling &amp; possession of MSSA's in the same way that pistols &amp; restricted weapons are. Currently pistols &amp; restricted weapons may be handled by persons without the appropriate firearms endorsement while under the immediate supervision of the owner. MSSA's should be treated in the same manner, thus simplifying compliance &amp; administrations for police. My Recommendations may be made public if required.</p> <p>Recommended changes to Police Report on Security &amp; Storage of Firearms Public Submission. [Do these refer to the Sub-committee comments on issues B1 to ? ]</p> <p><i>1st Recommendation:</i> There should be no creation of sub-categories of A-Class Firearms. This can only create distrust with Firearm Owners towards the Police.</p> <p><i>2nd Recommendation [re comment on B2?]:</i> This clause needs to be amended to allow for Safes &amp; Cabinets that are of a large weight and do not need to be fixed to the building due to the difficulty of move such heavy objects. The threshold weight should be 200kgs &amp; the Clause should read: B.2 Affixing safes to 2 surfaces of a building if their net weight is under 200 kgs. Safes or cabinets that are 200 kgs or greater do not need to be fixed to the building but it should be demonstrated that they cannot be easily</p>

	<p>moved. Any firearm kept in a Strongroom should not need to be secured within the Strongroom although it is preferable to do so. The Strongroom itself is the Security.</p> <p><i>3rd Recommendation [re comment on B3]:</i>  Under no circumstance should Police be allowed to either re-write or circumvent laws passed by Parliament through the use of Regulations or Orders in Council. Regulations for firearms should be developed through full an open consultation with Firearm Licence Holders. If agreement cannot be reached by the 2 parties, the status quo shall remain until such time the 2 parties reach agreement. All documents should be written in such a way to demonstrate this.  To many members of the Public, replies from the Police under the Official Information Act have not demonstrated the above.</p> <p><i>4th Recommendation [re comment on B4]:</i>  Any changes to Firearm Laws &amp; or Regulations should be notified to the Public &amp; ample time required to submit Recommendations. If the Public requests an extension of the consultation process it should be granted. Clear &amp; open Consultation with Firearm Owners &amp; the Public is worth investing in by the Police as it develops a good working relationship between all parties. It is a credit to the Police that they acknowledged the Time for Consultation was too short.</p> <p><i>5th Recommendation [re comment on B5]:</i>  Firearm Licence Holders are correct in saying no evidence has been presented to show current laws for the security of Firearms is not working. If there is evidence to show otherwise, this needs to be presented for critical analysis so workable Legislation can be enacted to maintain Firearm security. The current system of security checks works very well apart from some Inspectors wasting time by demanding the serial numbers of A- Category Firms which is not &amp; never should be a Legal requirement.</p> <p><i>6th Recommendation [re comment on B6]:</i>  The Rate of Firearm theft &amp; in particular the penalty for Theft of a Firearm needs to be addressed &amp; it should demonstrate the seriousness of the Offence.</p> <p><i>7th Recommendation [re comment on B7]:</i>  This is unnecessary &amp; should be removed. The fact that people already have a Firearm Licence is a contract in itself. Requirements such as this create distrust &amp; ill-will towards the Police, restricting co-operation between the 2 parties.</p>
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		<p><i>8th Recommendation [re comment on B9]:</i> This needs to be addressed as all too often criminals using firearms receive very little in the way of penalty for this.</p> <p><i>9th Recommendation [re comment on B10]:</i> There should be no attempt to introduce any aspect of British Firearm Laws in New Zealand. The current requirements for a Safe, Cabinet of 6mm steel construction or equivalent or Strongroom Storage should be sufficient.</p> <p><i>10th Recommendation [re comment on B11]:</i> All changes to current Laws &amp; Regulations should require cost benefit analysis &amp; evidence made available to the Public in a timely manner that demonstrates the need for change. This would validate the Police position, reassure the Public &amp; prevent the waste of Police resource &amp; Taxpayer's funds.</p> <p><i>11th Recommendation:</i> There should be a concerted effort to concentrate on deterring criminals from using or possessing Firearms. Penalties should be of the nature that Criminals become reluctant to be caught with a firearm.</p> <p><i>12th Recommendation:</i> With respect to all matters regarding Firearms, Firearm Licence Holders should be given the chance to comply with the law in a timely manner. If they choose not to, then other courses of action can be taken. A Firearm Licence Holder may be able to demonstrate good reason as to why they could not comply in time in which case an extension should be given. Having the option to achieve compliance within a specified time will encourage people to act within the Law if they have inadvertently not complied on technical aspects of it. It will also build confidence between Police &amp; the Public.</p> <p><i>13th Recommendation: B18</i> All vetting staff should follow a well written set of rules as defined by Police, the FACF &amp; Firearms Community.</p> <p><i>14th Recommendation:</i></p>
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		<p>Police should work diligently with the Firearms Community to build trust &amp; a working relationship. The role of the Police will be far easier with the support of Firearm Licence Holders &amp; the Public. Some documents released under the Official Information Act show otherwise.</p> <p><i>15th Recommendation:</i> The definition of a suitable safe has already been defined. If a recognised Engineer acknowledges that a safe, cabinet or Strongroom meets these requirements it should be acceptable. A recognised Engineer will be either a Registered Engineer or have a suitable Engineering Qualification such as a Diploma or higher. .</p> <p><i>16th Recommendation:</i> This is unlikely to be true. Police have large amounts of resource &amp; man-power available to them. Rather than squander it on areas of law that are not an issue Police should spend them time or areas of Law that can demonstrate to be an issue. A cost benefit analysis &amp; producing hard evidence will readily show there is genuine need for an area of Law to be addressed.</p>
11	Mark Fleet	<p>Please find my feedback on the Jan 2018 draft document.</p> <p>Page 4 - A locking system that is compatible with the overall strength of the cabinet. If a 'Hasp and Staple' is used, then these are to be of the type known as 'Security Hasp and Staple'. This locking system (and all fittings) <del>are to</del> should be bolted through the cabinet and not screwed.</p> <ul style="list-style-type: none"> <li>The cabinet <del>is</del> should be secured to at least two <del>surrounding</del> adjacent surfaces to prevent firearms being stolen by removal of the whole cabinet. The cabinet <del>is</del> should be fixed to the building <del>on two surfaces</del> with at least 6 mm fasteners and fastened to a rigid surface or support such as concrete, brick or through plaster board to a stud or dwang. Fasteners of 6mm x 75mm long will ensure at least 50mm of thread is engaged in the rigid support. Use heavy gauge 'coach' screws anchored by at least 50mm and a large washer placed under each coach screw head into the framing. If secured into concrete, use similar gauge chemical or expanding bolts.</li> </ul> <p><i>Comment: As this is a 'best practice' document words like are, is, will need to be replaced with should, may, can except where explicitly identified in the Arms Act. Have also deleted repeated words already described earlier in the paragraph.</i></p> <p>Page 5 The cabinet <del>is</del> should be fixed to the building on two surfaces with at least 6 mm</p>

		<p>fasteners and fastened to a rigid surface or support such as concrete, brick or through plaster board to a stud or dwang. Fasteners of 6mm x 75mm long will ensure at least 50mm of thread is engaged in the rigid support. Use heavy gauge 'coach' screws anchored by at least 50mm and a large washer placed under each coach screw head into the framing. If secured into concrete, use similar gauge chemical or expanding bolts. Floor fixing to a wooden floor to be completely through the floor. The bolts <del>will</del> may have a stout backing plate or sufficiently large washers to prevent them from being pulled through the floor.</p> <ul style="list-style-type: none"> <li>• Cabinet seams <del>are</del> should be welded or folded to prevent the cabinet being accessed using direct force or levers.</li> </ul> <p><i>Comment: See comment above, replacing is, are, will with should and may. Again this is not a requirement of the Arms Act but 'best practice' Police advice.</i></p> <p>Page 6 Racks should secure the firearm to prevent access by young children or theft. The firearms must be locked in the rack <del>and</del> or be locked and immobilised by, for example, using a trigger lock or by removing the bolt and securing the bolt elsewhere.  <del>There is a trigger locking mechanism locked in place or the firearm is otherwise immobilised in the rack.</del></p> <p>That the rack <del>is</del> should be hidden from sight and not easily detectable by someone unfamiliar with your property.</p> <p><i>Comment: The wording of the Arms Act states that firearms in racks must be locked or be locked and immobilised, sentence has been amended to reflect this.</i></p> <p><i>It is not a requirement of the Arms Act that trigger locking mechanisms or immobilising of firearms must be used, although it would be 'best practice' recommend their use. Delete sentence as already recommended at first sentence on this page.</i></p> <p><i>See comments above, replacing is with should. Again this is not a requirement of the Arms Act but 'best practice' Police advice.</i></p> <p>Page 8 The firearm <del>needs to be able to</del> shall be locked or be immobilised and locked in the display cabinet.</p>
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		<p>There <del>is</del> should be a trigger locking mechanism locked in place to immobilise the firearm or other <del>mechanism</del> method for immobilising the firearm.</p> <p><del>Ideally</del> Police recommend bolts and ammunition should be secured in a separate location from the firearms.</p> <p><i>Comment: The Arms Act specifies that in a display cabinet or rack that firearms shall be locked or locked and immobilised, so wording amended to reflect this. See comments above, replacing is with should. Again this is not a requirement of the Arms Act but 'best practice' Police advice. Mechanism has been used when method is a more consistent word in line with the Arms Act. Reworded statement about bolts and ammunition as it is again 'best practice' as the Arms Act does allow for these to be stored together under strict requirements for immobilising the firearm.</i></p>
12	Pat Barrett	<p>Dear Sub-Committee,</p> <p>I would like to express my concerns re the proposals outlined by Police for the review of security and storage for licensed firearm owners. While I realise that this process for submissions is well advanced and has been commented on in detail (I have read the relevant documents and submissions) I am nonetheless perplexed that Police have attempted to change the law regarding the reclassification of MSSAs to include semi-automatic A-Cat rifles (especially .22 semi-autos) into an E-Cat designation and thereby advance a policy of greater scrutiny, security, and storage for these firearms which have, by Police records, been shown have almost no appearance in crime statistics. Why is this? Are Police; or their agents, trying to circumvent the law and impose draconian restrictions on these legitimate firearms and thereby introduce a series of unworkable measures which will only increase the pool of 'grey' firearms?</p> <p>Along with this concern I am appalled at how cumbersome and confusing is the language used and presentation of this document for general public use - it is extremely confusing to attempt to ascertain just where the law and the new security <i>suggestions</i> start and finish. Are Police deliberately trying to confuse the public and firearms owners? If so this is a shocking indictment of Police and their in-house measures to circumvent the law.</p> <p>I also find the suggestions for additional security measures unnecessary and unworkable for licensed firearm owners when the current code of practice is both acceptable and a common sense approach to security and storage. Perhaps it would be a better policy to inspect the premises of all licensed firearm owners to ascertain that they are complying with the current</p>

		<p>code of practice rather than introduce a new raft of provisions for security and storage which are already well covered under the existing law.</p> <p>Police also need to get tough with gangs and the criminal element and investigate where their pool of firearms is coming from.</p> <p>I would further state that it appears to be illegal for Police to add a contract clause for signature on this new draft of suggestions for security and storage, when this is not part of the current law. Is this an attempt at coercion by Police?</p> <p>Lastly, Police must dialogue more with licensed firearms owners and promote a climate of trust among the public who use firearms so as to avoid the kind of confusion and distrust this draft document has engendered.</p>
13	Name withheld	<p>I am concerned that the proposed “guidelines “will be treated by the Police as requirements prior to the issue or renewal of a FAL. I have had a recent experience where this approach was adopted by the person who came to interview me and inspect my firearms security arrangements.</p> <p>I was told if I didn’t comply with his view of how I should secure my Firearms then he would refuse to approve my application. In fact the security arrangement is exactly the same as it was on the last 2 times I had been inspected. What gives me cause for concern is that what he was quoting is word for word what are now being proposed as the new guidelines.</p> <p>A friend of mine had an identical experience and I have heard similar reports from others. A number of people have also expressed concerns similar to mine i.e. that the Police will refuse to renew FAL’s for those who have already had their security inspected and passed on past inspections on the pretence that the security arrangements don’t meet the guidelines.</p> <p>Also, there is no mention of the situation where the place of storage is protected by a monitored alarm system or some electronic alarm system.</p> <p>What guarantees will be put in place to ensure that alleged non-compliance with these guidelines will not be used as an excuse to refuse to issue or renew a FAL in the future? Why is there no mention of alarm systems? My experience is that the Police employees have</p>

		been very prescriptive in their interpretation of this issue and there is no discernible exercise of a discretion.
14	Tim Goode	<p>I've always noted that the word "premises" for the location of firearms in the Act is replaced with and enforced as "residence" in the Police guidelines, presumably because it is assumed that there is more likelihood of the licence holder's regular presence at a residence preventing theft, unauthorised access, or discovering if unauthorised access to the arms has occurred.</p> <p>I think that "premises" should also be extended to any business or storage space for which a private licence holder owns or rents, not just firearms dealers premises.</p> <p>Has this insistence on residence replacing premises been tested in court please?</p> <p>I would also like to register a strong objection to needing to enter my Firearms licence and the name on the licence to TradeMe for the purposes of ONLY ASKING A QUESTION. That is outside any requirement in law and TradeMe have only put this in place because you the Police have pressured them to do so - why would they inconvenience their customers unnecessarily - and it is completely unnecessary, and an inconvenience. Are you aware that this policy of yours forces all TradeMe users who want to inquire about any firearms for sale to have a TradeMe User Name that matches the first name on the licence? So whereas previously I corresponded on TradeMe as Tim, now I have to be known as Timothy without the option, otherwise I can't make inquiries about firearms. This becomes more of a problem for folk who do not wish to use their first names at all other than being obliged to do so on official Documents. Please remedy this.</p>
15	Stuart Harker	<p><u>1<sup>st</sup> Recommendation:</u>  <b><u>B.1 Creation of a new sub category of Category A Semi-Automatics</u></b></p> <p>Comment: There should be no creation of sub-categories of A-Class Firearms. This can only create distrust with Firearm Owners towards the Police.</p> <p><u>2<sup>nd</sup> Recommendation:</u>  <b><u>B.2 Affixing safes to two surfaces, eliminating wooden racks, creating the need for strong-rooms and the definition of "stout"</u></b></p>

	<p>Comment: This clause needs to be amended to allow for Safes &amp; Cabinets that are of a large weight do not need to be fixed to the building due to the difficulty of move such heavy objects. The threshold weight should be 200kgs &amp; the Clause should read:</p> <p>B.2 Affixing safes to 2 surfaces of a building if their net weight is under 200 kgs.</p> <p>Safes or cabinets that are 200 kgs or greater do not need to be fixed to the building but it should be demonstrated that they cannot be easily moved.</p> <p>Any firearm kept in a Strongroom should not need to be secured within the Strongroom although it is preferable to do so.</p> <p>The Strongroom itself is the Security.</p> <p><u>3<sup>rd</sup> Recommendation:</u></p> <p><b><u>B.3 Police are creating law and changing legislation outside their authority</u></b></p> <p>Comment: Under no circumstance should Police be allowed to either re-write or circumvent Laws passed by Parliament through the use of Regulations or Orders in Council.</p> <p>Regulations for Firearms should be developed through full an open consultation with Firearm Licence Holders.</p> <p>If agreement cannot be reached by the 2 parties, the status quo shall remain until such time the 2 parties reach agreement.</p> <p>All documents should be written in such a way to demonstrate this.</p> <p>To many members of the Public, replies from the Police under the Official Information Act have not demonstrated the above.</p> <p><u>4<sup>th</sup> Recommendation:</u></p> <p><b><u>B.4 Minimal Time to allow Responses</u></b></p> <p>Comment Any changes to Firearm Laws &amp; or Regulations should be notified to the Public &amp; ample time required to submit Recommendations.</p> <p>If the Public requests an extension of the consultation process it should be granted.</p> <p>Clear &amp; open Consultation with Firearm Owners &amp; the Public is worth investing in by the Police as it develops a good working relationship between all parties.</p> <p>It is a credit to the Police that they acknowledged the Time for Consultation was too short.</p> <p><u>5<sup>th</sup> Recommendation:</u></p>
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**B.5 There has been no evidence provided that the current laws around security are not working**

Comment: Firearm Licence Holders are correct in saying no evidence has been presented to show current laws for the security of Firearms is not working.

If there is evidence to show otherwise, this needs to be presented for critical analysis so workable Legislation can be enacted to maintain Firearm security.

The current system of security checks works very well apart from some Inspectors wasting time by demanding the serial numbers of A- Category Firms which is not & never should be a Legal requirement.

**6<sup>th</sup> Recommendation:**

**B.6 These changes are aimed at lawful firearms owners**

Comment: The Rate of Firearm theft & in particular the penalty for Theft of a Firearm needs to be addressed & it should demonstrate the seriousness of the Offence. I.E Minimum 5 year no parole custodial sentence to be served consecutively with the sentence of what serious crime has been committed.

(Armed Robbery, assault, etc)

**7<sup>th</sup> Recommendation:**

**B.7 Receipt Portion should be removed**

Comment: This is unnecessary & should be removed.

The fact that people already have a Firearm Licence is a contract in itself.

Requirements such as this create distrust & ill-will towards the Police, restricting co-operation between the 2 parties.

This is just a time and money wasting process for both the fire arm owner and police!

**8<sup>th</sup> Recommendation:**

**B.9 Harsher penalties for those who commit crime and contraven firearms law**

Comment: This needs to be addressed as all too often criminals using firearms receive very little in the way of penalty for this.



. I.E Minimum 5 year no parole custodial sentence to be served consecutively with the sentence of what serious crime has been committed.  
(Armed Robbery, assault, etc)

9<sup>th</sup> Recommendation:

**B.10 Opposition to using British Standards**

There should be no attempt to introduce any aspect of British Firearm Laws in New Zealand. The current requirements for a Safe, Cabinet of 6mm steel construction or equivalent or Strongroom Storage should be sufficient.

10<sup>th</sup> Recommendation:

**B.11 No cost/benefit analysis completed, and no hard evidence for change**

Comment: All changes to current Laws & Regulations should require cost benefit analysis & evidence made available to the Public in a timely manner that demonstrates the need for change.

This would validate the Police position, reassure the Public & prevent the waste of Police resource & Taxpayer's funds.

11<sup>th</sup> Recommendation:

**B.14 Concentrate on the criminals**

Comment: There should be a concerted effort to concentrate on deterring criminals from using or possessing Firearms.

Penalties should be of the nature that Criminals become reluctant to be caught with a firearm.

12<sup>th</sup> Recommendation:

**B.16 Non-compliance from lawful owners**

Comment: With respect to all matters regarding Firearms, Firearm Licence Holders should be given the chance to comply with the law in a timely manner.

If they choose not to, then other courses of action can be taken.

A Firearm Licence Holder may be able to demonstrate good reason as to why they could not comply in time in which case an extension should be given.

		<p>Having the option to achieve compliance within a specified time will encourage people to act within the Law if they have inadvertently not complied on technical aspects of it. It will also build confidence between Police &amp; the Public.</p> <p><u>13<sup>th</sup> Recommendation:</u>  <b><u>B.18 Vetting staff</u></b></p> <p>Comment: All vetting staff should follow a well written set of rules as defined by Police, the FACF &amp; Firearms Community.</p> <p><u>14<sup>th</sup> Recommendation:</u>  <b><u>B.22 Erosion of trust in Police</u></b></p> <p>Comment: Police should work diligently with the Firearms Community to build trust &amp; a working relationship. The role of the Police will be far easier with the support of Firearm Licence Holders &amp; the Public. Some documents released under the Official Information Act show otherwise.</p> <p><u>15<sup>th</sup> Recommendation:</u>  <b><u>B.24 Need more images of 'correct' safes</u></b></p> <p>Comment: The definition of a suitable safe has already been defined. If a recognised Engineer acknowledges that a safe, cabinet or Strongroom meets these requirements it should be acceptable. A recognised Engineer will be either a Registered Engineer or have a suitable Engineering Qualification such as a Diploma or higher.</p> <p><u>16<sup>th</sup> Recommendation:</u>  <b><u>B.30 Police under resourced</u></b></p> <p>This is unlikely to be true. Police have large amounts of resource &amp; man-power available to them. Rather than squander it on areas of law that are not an issue Police should spend their time or areas of Law that can demonstrate to be an issue.</p>
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		<p>A cost benefit analysis &amp; producing hard evidence will readily show there is genuine need for an area of Law to be addressed.</p> <p>ATTACHMENT TWO: Police Consultation for the Storage of Firearms.</p> <p><u>1<sup>st</sup> Recommendation:</u> Page 10 should be amended to: Steel Safes, Boxes or Cabinets</p> <ol style="list-style-type: none"> <li>1. Be of sound Construction</li> <li>2. Bolted or securely fastened to the building within which the pistol, MSSA or restricted weapon is kept</li> <li>3. Construction shall be as listed below.</li> </ol> <p>NB: It should not be necessary for the police to approve each storage safe, cabinet or box in writing. If a container meets the required construction, it should automatically qualify as acceptable storage.</p> <p>The requirement to approve in writing can lead to a huge amount of wasted time &amp; money by all parties.</p>
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This time & money could be better spent elsewhere.

Police recommends:

- The steel safe, box or cabinet should be constructed from 6mm mild steel or its equivalent. The steel safe, box or the cabinet should be built and finished in a competent manner with negligible gaps between all fixed parts. If you propose to construct the safe, box or cabinet of a single plate dimension measuring less than 6 mm mild steel, you must provide evidence to Police, to demonstrate the material will perform to the same standard or exceed the level of 6mm mild steel.
- The steel safe, box or cabinet to have locking mechanism(s) of no less strength and security performance than a five lever mortise dead lock that engages the door with the frame at least at two or more points. If the door on a steel box is of a reduced size (for example, intended for pistols, only one locking mechanism may be sufficient. However the construction of the door is constructed in a way that prevents distortion due to a direct force or leverage.
- Any door handle fitted to be designed to break off under leverage. If the door handle is not designed to break off under leverage, the handle to operate the locking mechanism through a clutch system designed to slip before causing the lock to fail.
- A steel safe, box or cabinet to be bolted to a minimum of two surfaces, one of which must be the floor. Bolt shafts shall be a minimum of 10 mm in diameter and when bolted into concrete, expanding or chemical setting bolts may be used.
- Where the steel safe, box or cabinet is bolted to a wooden floor, it should be bolted through the floor to a 6mm mild steel plate (or equivalent), which exceeds the floor area of the cabinet and is

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<sup>5</sup> Section 32(1)(b).

<sup>6</sup> Regulation 28(1)(c).

<sup>7</sup> Regulation 28(2).

retained on at least two floor joists in the sub-floor space. All nuts should be on the inside of the cabinet with the bolts welded or burred to resist removal. Police recommend that the steel safe, box or cabinet be bolted into a confined space, such as a wardrobe or a cupboard.

2<sup>nd</sup> Recommendation:

		<p><b>28 Security precautions in relation to pistols, military style semi-automatic firearms, and restricted weapons</b></p> <p>(1) Every person who is lawfully entitled to possession of a pistol, military style semi-automatic firearm, or restricted weapon other than an air pistol by virtue of a permit under section 18 of the Act or a firearms licence endorsed under section 30 or section 30B of the Act shall ensure that, except when the pistol, military style semi-automatic firearm, or restricted weapon is in his or her immediate physical possession or is being used, in accordance with section 31 of the Act, for the purpose of making a broadcast or producing or staging a play or filming a cinematic production or television film or is in the custody of a licensed dealer or a member of the Police, it is –</p> <p>Comment: This clause should be expanded to treat the handling &amp; possession of MSSA's in the same way that pistols &amp; restricted weapons are.</p> <p>Currently pistols &amp; restricted weapons may be handled by persons without the appropriate firearms endorsement while under the immediate supervision of the owner. MSSA's should be treated in the same manner, thus simplifying compliance &amp; administrations for police.</p>
16	<b>Russell Peters</b>	<p>It is interesting to read some of the proposed changes to firearm storage. I agree we must have good storage but please don't go over the top. Let's face it even the police have people escape from their custody, even maximum security prisons and in many cases these inmates commit other offences while on the run. If the police who I would presume have the best security in the country fail at times what chance does poor joe public have of having a failsafe security system. The way I see these proposed changes is that the police have failed in controlling the criminals in this country and the and easiest option is to make it harder for the law abiding citizens to comply with security regulations hence taking away some of the police work and putting it onto the firearm owner. Please don't make it too hard for firearm owners, it is much better to have them on your side than against you, lock up people who use firearms in crime for a lot longer than one who doesn't hit the offender (criminal)not the law abiding citizen.</p>
17	<b>Phil Gregeen Sporting Shooters Ass</b>	<p>The Sporting Shooters Association of New Zealand is of the firm opinion that all firearm owners have a responsibility to their families and the community at large to secure all firearms in such a way as to deny access to them by young children and such other persons not authorised to have</p>

		<p>access, in particular opportunist thieves. We recognise that no level of security will prevent a determined and well planned burglary with enough time to execute their plan from gaining access.</p> <p>We consider that the document “New Zealand Firearms Licence Secure Storage Requirements: Police Policy and Practice - January 2018” provides firearm owners with a number of practical solutions and advice for the secure storage of firearms of all categories without imposing impractical or over restrictive constraints on firearm owners.</p> <p>We believe that firearm owners should be encouraged to achieve the best security they can reasonably achieve having regard for their individual circumstances, to this end inspecting officers should be trained to offer advice in addition to simply carry out inspections.</p> <p>While recognising that it is not within the remit of those responsible for this document we would wish to see more effort made by police to recover stolen firearms and also tougher penalties for those convicted of firearm theft or other criminal use of a firearm.</p>
18	<b>David Mac</b>	<p>To whom it may concern,</p> <p>Sound practical advice on safe firearms storage, bearing in mind the individual circumstances of the licenced owner, should be part of the training of inspecting officers not just rote following of a rule book. Given the availability of a very wide range of portable power tools and easy transport it will never be possible to entirely thwart the truly determined thief so much more emphasis needs to be placed on deterrence. Sentences for those who have been convicted of the theft of firearms need to be much more severe and criminals must be aware that really robust measures will always be taken by the police to track down stolen firearms and apprehend those responsible for their theft. Theft of a firearm should always be an aggravating factor in any break in and sentences for such theft should always be consecutive not concurrent.</p> <p>It is my opinion that firearms owners in general do take good and reasonable steps to secure their lawfully owned property. It is up to the police and the judiciary to make greater efforts to cooperate with lawful firearms owners and reinforce the efforts of the law abiding to keep guns out of the hands of criminals.</p>
19	<b>Tony Orman</b>	<p>While storage of firearms is important especially to avoid children having unsupervised access to firearms, it has to be realised criminals will with the right tools, gain access to a firearm even though it's under lock and key. Law abiding firearm owners do secure firearms.</p>

		What is needed is a strong deterrent to criminals' thgdeiqing [sic] a firearm and using it in a crime. This is up to police and judges, firstly police to recommend heavy fines/imprisonment and judges to carry this out in sentencing. It would be far better to raise penalties for firearm theft and to have a 12 year imprisonment for a crime with the particular crime's penalty on top of that.
20	<b>Anonymous</b>	<p>Sound practical advice on safe firearms storage, bearing in mind the individual circumstances of the licenced owner, should be part of the training of inspecting officers. Given the availability of a very wide range of power tools and easy transport it would never be possible to entirely thwart the truly determined thief, so much more emphasis needs to be placed on deterrence.</p> <p>Sentences for those who have been convicted of the theft of firearms need to be much more severe and criminals must be made aware that really determined measures will always be taken by the police to track down stolen firearms and apprehend those responsible for their theft. Theft of a firearm should always be an aggravating factor in any break in and sentences for such theft should always be consecutive not concurrent.</p> <p>I believe that firearm owners, in general do take good and reasonable steps to secure their lawfully owned property. It is up to the police and the judiciary to make greater efforts to cooperate with lawful firearms owners and reinforce the efforts of the law abiding, to keep guns out of the hands of criminals.</p>
21	<b>Stuart Hayman</b>	<p>I speak as someone who has been using and storing firearms in NZ for over 40 years. During this time we have seen a steady increase in theft of firearms, illegal use of same (i.e. stolen, or illegally modified, or used by someone without a FLIC, or used in the commission of a crime). These are almost invariably not "restricted firearms" - MSSAs or pistols, but mostly shotguns which have always had minimal control, and have then been illegally modified. Several recent court cases illustrate this.</p> <p>We have also seen a steady increase in the required level of security. I feel that the security requirements for restricted firearms is being complied with pretty well, but that the same cannot be said for the lower levels of security required for A category firearms.</p> <p>This low/non-existent level of criminal use of endorsed firearms suggests that the current level of security for these restricted firearms (pretty much as detailed in the draft) - coupled with the very small percentage (out of the total) of firearms in this category, has been and is successful in keeping them secure and avoiding theft.</p>

		<p>Possibly this is assisted by the regular inspections of security for and check of restricted firearms. I am not aware that inspection of security for A cat firearms is carried on a regular basis after an initial inspection for a new licence holder. While checking the firearms themselves is not required, maybe checking the security and that it does contain at least some firearms, might be useful in encouraging safe storage?</p> <p>Overall I think the draft provides good guidance on what is required of firearms licence holders/firearms owners by way of security, and I didn't feel there are any unreasonable requirements.</p>
22	Grant Daniels	<p><b><u>Comment on police proposal to alter firearm secure storage regulations.</u></b></p> <p>This comment is in relation to the second police draft of November 2017.</p> <p>The reference on page 5 of the Nov 17 draft document should have any mention of <u>firearms and ammunition being stored together</u> removed. What are they thinking?</p> <p>On page 5 of the Nov 17 draft document, police appear to be separating out the various types of A category firearm and setting different storage standards for some of them. <u>Can they elaborate what is their actual (future) agenda is with this proposal?</u></p> <p>On page 6 of the Nov 17 draft document the police mention the British standard for steel security containers (BS7558) as a proposed standard for non-endorsed firearms. They have spent several of the previous paragraphs listing other standards – also for non-endorsed firearms. Which standard are they proposing? <u>They need to clarify this dual standard proposal, both for themselves and for the people who will have to confirm if any of these proposals make it to law.</u></p> <p>The current Arms Act has sufficient security regulation and inspection requirements and does not need this misguided and confusing re-write. Police time and resources can be much better spent enforcing the current Arms and Crimes Acts.</p> <p>The problem is enforcement of penalties for criminals who use firearms in the commission of a crime.</p>



		<p><b><u>General Comment on policy and actions.</u></b></p> <p>I am dissatisfied with the current police-designed form used for the security check of restricted firearms. The vetting officer is at your place of residence to inspect the security and serial numbers of your restricted firearms only.</p> <p>Suffice to say that if you have restricted firearms, your security is of a much higher standard than the A category regulations and so A category firearms are of no concern in this situation.</p> <p>The current police-designed form asks for a list of serial numbers for A category firearms. Police representatives have to be reminded that New Zealand Arms Act does not have compulsory firearm registration and so they do not legally allowed to record A category firearms.</p> <p>The current police-designed form also asks for the quantity of A category firearms you possess and how many A category firearms you <b>think</b> could fit into your safe, and the police representative records a number on their form.</p> <p>This form is illegal, because it requires information that is not based in law.</p> <p>The police need to put much more time and effort into prosecuting criminals who use firearms in the commission of a crime rather than trying to enforce this illegal "police policy" with the law-abiding firearms community.</p> <p>I believe that the time police waste conducting enquiries of law-abiding firearms owners are outside the terms of reference and the time could be used much more productively.</p> <p>I also believe that if police acted in accordance with the New Zealand Arms Act, rather than their interpretation of it for their own ends, ( "police policy") the police relationship with the firearms community would be in a much better state that is currently is.</p>
23	Grant Hammond	<p>I am a licenced firearm holder.</p> <p>I make the following submission on the draft "New Zealand Firearms Licence Secure Storage Requirements: Police Policy and Practice January 2018" document issued by the Police.</p> <p>I am pleased that the Police have revised their first draft issue last year and are no longer attempting to re-categorise A Cat semi autos and force me to agree to an illegal police policy by</p>

		<p>signing a contract! I have to wonder how the Police organisation could have allowed such onerous, and ill-conceived policy to be released to the public.</p> <p>The latest draft still mixes policy with law and is very unclear what is a legal requirement vs best practice, so I am still unclear on what I “legally” have to provide to meet the firearms legislation! For example the title reads “Requirements” , yet the purpose of this document is defined as:</p> <p>“This document has been created to assist firearms licence and endorsement applicants by providing guidance on how the security conditions might be met and to facilitate national consistency”</p> <p>So clearly the security conditions set out in this document are not “requirements” but rather “recommendation”. The title of this document needs to be changed accordingly.</p> <p>The document needs to provide a section that outlines the options for dispute resolution when there is disagreement between the police inspector and licence holder as to whether the level of security being provided meets the law!</p> <p>I would also like to remind the Police it is their job to obey and enforce the law and not make it! There have been many examples in the past few years where the Police have exceeded their mandate by making their own interpretation of the firearms legislation at significant adverse impact on legitimate firearm users!</p> <p>I point out that licenced firearm holders are not the main cause of firearm related crimes, so why do the Police place so much emphasis into hindering and restricting licenced firearm holders legal activities which takes police resources away from pursuing illegal firearm related crime?</p> <p>I believe more police resources needs to be put into responding and resolving firearm theft so they may improve their dismal conviction rate that I believe is currently at something like 8%</p> <p>I believe there needs to be far more severe penalties imposed on firearm related crime to deter reoffending. Thieves need to have a significant deterrent so they do not steal firearms by opportunity when committing a burglary. Currently there is no deterrent, with criminals having</p>
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		20, 30, 40 reoccurring firearm offences! How can this be possible? If firearms are that dangerous to the community, then why do the Police and the courts allowing recidivist reoffending????
24	Chaz Forsyth	<p><b>January 2018 version of 'Secure Storage Requirements for Firearms Licence Holders'</b></p> <p>This is to state that I find no objection to the draft.</p> <p>Achieving a balance between the setting of prohibitively expensive security standards, the incidence of firearm theft through burglary, and meeting the goals of public safety is always likely to be difficult.</p> <p>This version of the document has made noble efforts to achieve such a balance.</p>
25	Benjamin Cheer	<p>.</p> <p>I whole heartedly agree with the document.</p>
26	John Hart	<p>Security has always been part of my life. I endorse the submissions presented by the various groups involved with firearms and believe the security of firearms is of immense importance both to us and the wider community. But, for my part, I do not wish to be the scape goat for the criminal activity out there stealing firearms, or stealing anything for that matter. Why is the problem shifted from the criminal onto the lawful citizen?</p> <p>I read from the select committees report that penalties and punishment was outside the terms of reference for the security of firearms and ammunition but it does appear that stricter requirements for firearm security is a more controllable agenda than encouraging thieves not to steal. It was also reported that most firearm owners followed "Police Policy" because it seemed like good practice and in some cases it was, but "Policy" can be the personal agenda of an individual or group. Just saying my say.</p> <p>Anyway. Back to security of firearms. Yes, it is of importance and as already stated, I endorse those submissions put forward by interested groups but security must be a reasonable, financial and mechanical achievement for the average person.</p> <p>Respectfully</p>

27	Craig Benbow	<p>With regard to the proposed changes to storage requirements for licensed firearms owners I wish to submit the following comments and convey my frustration at yet another attack on law abiding firearm owners being faced with increased compliance measures and cost because Police appear to be failing to carry out their sworn duties.</p> <p>The entirety of the measures described in this document appear to be aimed at this part of regulation 19:</p> <p>&gt; (c) the holder shall take reasonable steps to ensure that any firearm in the holder's possession &gt; is secured against theft:</p> <p>While it is entirely desirable to ensure criminals cannot access firearms easily, given they are almost always the individuals who use firearms against another, the increased requirements contained in this draft document will impact every licensed firearm owner in some way shape or form. For most it will be more cost through replacement of storage cabinets or strengthening what they already possess. This should not be required. Our houses should not be targets of burglary and people carrying out these types of crimes should be caught more often and treated far more harshly by the courts. I am firmly of the belief that these proposed changes will have little to no impact on the ability of criminals to steal firearms repeatedly. Increased policing success and severe penalties are the only things that will secure our homes against these people who seek to benefit from others hard work.</p> <p>I see the proposed changes to storage being troublesome to evaluate and in some cases difficult to comply with. Cabinets that are not 3mm thick need additional bracing installed in them and their doors. A well prepared burglar will still access the cabinet easily with a breaking bar and we are only required by regulation to prevent "casual theft" so I suggest this requirement will have little effect for quite some inconvenience of law abiding firearm owners. No licensed owner wishes to lose his or her firearm to a burglar but I just do not believe for one minute the additional measures in this draft will have any effect. The advent of high performance cordless drills and grinders means that the well prepared burglar can access steel cabinets quite quickly with minimum noise, a 3mm cabinet will not take much more time than a thinner one and the ability to cut through locking lugs equally as quickly indicates there is little to be gained. If they really are focused on getting into a case it will happen. Casuals would not attempt it and would go for the TV and other easily traded items in preference so why try to protect against those that</p>
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		<p>will only be stopped when they are caught, convicted and jailed.</p> <p>I implore the New Zealand Police to re-double their efforts to investigate fully, gain convictions for and help sentence burglars to lengthy jail terms that will ensure they cannot gain access to firearms as part of their sinister activities. I do not support these additional requirements on licensed firearms owners and do not wish to see New Zealand Police attempting to implement policies not backed by fact and the law.</p>
28	Logan Whitford	<p>I'm all for a uniform increased security requirement for firearm storage however I do believe that 3mm steel to be overkill for a cabinet when one of wooden construction is acceptable also.</p> <p>A rigid 1mm steel lockable safe, braced appropriately should suffice and should be the minimum standard.</p> <p>I feel that by bringing in standards that are quite a financial burden when people have already forked out to go over and above the current standard to be unreasonable.</p> <p>The penalties for illegal possession and use of firearms need to be increased instead of taking the easy way out and penalizing law abiding firearm owners.</p>
29	Paul Carmine	<p>There is no need to change any rules as regarding secure storage .The current rules are adequate and working well. Metal safes can easily be broken into by any determined and equipped thief .They provide no more security than the current devices designed to stop random thieves or family members from gaining access to firearms. The added experience is not warranted.</p>
30	Tony Bruce	<p><b>Secure Storage Requirements for Firearms Document Feedback:</b>  <b>A) General Comments:</b></p> <p>- Although I can see the need to have a standardised document for the storage of firearms, I would suggest that this document needs further work as it is likely to get a significant shooter backlash in its current state.</p>

	<p>- The current firearms laws and storage requirement have been in place since 1992, and have widespread support and compliance from the shooting public. I would comment that there has been no law change, so these changes in firearm security requirements has come from the Police and there was no mandate from Government to do so. So why are the Police doing so now? You are risking a non-compliance situation with otherwise law abiding shooters.</p> <p>- NZ has a very high rate of firearms ownership, yet we also have a very low crime rate compared to other countries with similar rates of firearms ownership. I would suggest that the gun culture in NZ is very mature, and the firearms concerns from other countries do not necessarily apply here. The Guns per capita in NZ -= 22.6 per 100 residents which is a high level compared to other countries, but NZ does not have the level of firearms related crime that those other countries have. See: <a href="http://www.washingtonpost.com/wp-srv/special/nation/gun-homicides-ownership/table/">http://www.washingtonpost.com/wp-srv/special/nation/gun-homicides-ownership/table/</a></p> <p>- The current firearm law and firearms regulations state: 1 (a) the holder shall not put a firearm in such a place that a young child has ready access to it. 1 (c) the holder shall take reasonable steps to ensure that any firearm in the holder's possession is secured against theft.</p> <p>It has always been accepted that a firearm is secure if a child or casual burglar cannot access the firearms without using a tool. There has never been any requirements for higher levels of Security. The low levels of firearms thefts attest to the effectiveness of this current requirement, and I would be suggesting leaving the status quo.</p> <p>- New Zealand has a very low rate of firearms crime overall and the current laws and requirements are well accepted and supported by the shooting public.</p> <p>- If we look at the numbers of shootings and criminal activity, then as there is no increase in firearms crime; and the events that do occur are so infrequent that to tighten up on the requirements will not significantly affect the crime rates. So to there is no justification in risking alienating the NZ shooters to achieve an unsupported more secure position.</p> <p>- From another previous submission we see the numbers of firearms stolen each year data</p>
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supplied by the police.  
<https://kiwigunblog.wordpress.com/2017/09/16/the-true-number-of-guns-stolen-in-new-zealand-each-year/>

An average of 585 firearms get taken each year for the past 10 years. (le less **than 600 firearms per year are stolen**, with a range of 494 – 806). This 600 firearms sounds like a lot, but if we look at the statistics it is an insignificant number.

There are an estimated:  
**1.3 million plus firearms in NZ.**  
**55,000 new firearms enter NZ each year.**  
**250,000 licensed firearm shooters**  
**Each firearm owner owns 4 firearms (on average)**

Therefore for our 600 stolen firearms we are looking at around **150 firearms owners being burgled each year** (600/4) Now, there are **52000 burglaries per year** in NZ (Police data – Crime at a Glance – Dec2017)) That means that a burglary involving firearms= **0.29% of all burglaries.** (150/52000)  
600 firearms being stolen (of 1.3 million) = **0.05% of all firearms are stolen** (600/1,300,000)  
Firearms owners being burgled = **0.06% of all Firearms Licence holders** (150/250000)

Why then are the Police tightening up on Secure Storage regulations (that have well supported for 25 years), when any increased security is not going to give a significant corresponding improvement in the crime rate?

- The Police have also not taken into thought the number of shooters in rental accommodation. Many landlords will not allow containers that are secured in 2-3 directions. Where or how will these shooters secure their guns if the landlords will not allow the extra security required? If the requirements are implemented then you are risking widespread non-compliance from this group of shooters.
- As an aside, I would also make the point that this document does not give any advice on the storage of firearms that DO NOT require a Firearms licence to be held. (eg by 'non-Firearms

License holding adults' owning air guns or antique muzzle loading firearms).

- Also the document does not mention that there is no secure storage exemption nor Firearms Licence exemption for deactivated firearms; and that these firearms are classed as real firearms still and need to be secured in the same manner as whole and useable firearms.

- The document does not cover the storage requirements for the transport of firearms in cars or public transport

- The document also does not cover the storage requirements for firearm parts.

le when is a firearm a firearm? When you have an action/bolt and a barrel perhaps?

What is the status then of a barrelled action?

Or an action without a barrel attached?

Or a barrel on its own?

People need to secure the firearm, but many parts are not treated in the same way.

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#### **B) Page 1 – Title Page.**

Why have you used a picture of shooters in a prone supposedly shooting position, when the document is about the storage of firearms?

I would be suggesting using a picture like this of correctly stored firearms.





		<p><b>C) Page 3 ‘Lockable Cabinets, Containers or Receptacles’</b></p> <ul style="list-style-type: none"> <li>- It is not clear from document what are the ‘legal requirements’ and what are ‘Police recommendations’. The requirement line needs to be stressed. – Perhaps in a darker font.</li> </ul> <p>And where do the words ‘<i>substantial and sturdily constructed</i>’ come from? These words are not used in the Act or Regulations</p> <ul style="list-style-type: none"> <li>- As for your statement ‘<i>For wooden cabinets, Police recommend~~</i>’ What does this mean? This statement is totally confusing – You are saying that you recommend a standard but are not enforcing it?</li> <li>- How does this equate to the use of a lockable wardrobe or cupboard – this has been accepted as a valid standard for the past 25 years?</li> <li>- What is an equivalent standard to 16mm plywood? Who defined this? And what equivalents are available to be used instead of plywood? Can we use 25mm MDF or a 16mm hardwood planking instead? If you are specifying a standard, perhaps you also need to have standard plans to supply to shooters so they can comply. I can see this section causing significant confusion in the future</li> </ul> <p><b>D) Page 5 Steel Cabinets, Containers or Receptacles</b></p> <ul style="list-style-type: none"> <li>- Where have these requirements come from?</li> <li>- Where has the requirement for a 3mm steel walled cabinet come from?</li> <li>- These requirements you are raising the standard required for an A Cat firearm way above the requirements specified in the Act and Regulations.</li> <li>- What equivalent material tables are being offered for people using alternative containers?</li> <li>- If you impose this standard, you will need a long lead in time as there are thousands of otherwise secure lockable cabinets being used that will suddenly no longer be acceptable. Have you thought about the implications on the supply chain – where are people suddenly going to buy the 10 – 50,000 containers that will now be required to be installed?</li> </ul>
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	<ul style="list-style-type: none"> <li>- You have increased the requirements for an A Cat firearm, these are not a restricted firearm.</li> <li>- If you implement these requirements, then you will alienate a large proportion of the shooters. And you will risk having a non-compliance situation develop if people have to pay too much to upgrade their security</li> <li>- If the existing storage has been seen to be adequate – as seen by the low rate of burglaries of the existing standards – then why impose something more secure?</li> <li>- The traditional steel ‘Locker’ has been a standby for 25 years. Have you any evidence that these so called ‘lesser cabinets’ are any less secure than the cabinets you are recommending?</li> <li>- How is the firearms Vetter to know if the securing bolt complies?</li> <li>- Note that the Steel Safe on page 6 looks to me to be an E Cat Safe, and is not an A Cat one.</li> </ul> <p><b>E) Page 6 Racks</b></p> <p><i>‘Racks should secure the firearm to prevent access by young children or theft. The firearms must be locked in the rack and be immobilised by, for example, using a trigger lock or by removing the bolt and securing the bolt elsewhere’</i></p> <ul style="list-style-type: none"> <li>- Nowhere in the Act does it say that a firearm must be locked in a rack AND immobilised!</li> <li>- Most racks I have bolt holes that will make the securing bolts un-accessible once a firearm is secured. Thus they comply with the requirement that they stop children and casual burglars who would need tools to remove the firearms.</li> <li>- 20% of the population shifts address every year, so these racks WILL need to be regularly removed and reinstalled by the owners. If the racks are too secure then the shooters will need to leave them behind.</li> <li>- Page 6 ‘That <i>the rack is hidden from sight and not easily detectable by someone unfamiliar with your property</i>’ Nowhere in the Act does it say that a firearms rack should be hidden away. You are not taking into account that there are thousands of firearms validly secured with gun racks above fires etc</li> </ul>
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– that cannot be seen from outside the property but are correctly secured.

Nowhere does it say that a firearm must be hidden away.

#### F) Page 8     **Display Cabinets**

*'The firearm needs to be able to be immobilised and locked in the display cabinet'*

- Where has this requirement come from? A better standard would be 'that the firearms are secured by a minimum of a steel cable or arm and a padlock so that it cannot be removed'.

- Unsecured firearms in a glass fronted gun rack was the standard with the old glass fronted display cabinets, but you have very few of these being used any more.

- If the firearm is correctly secured, then there is no need to also immobilise the trigger

- If the Display cabinet is otherwise compliant and is equivalent to a wooden container, and the firearms are secured so that a child or other casual burglar cannot take them, then this section is almost redundant.

#### G) Page 8     **Ammunition**

Your first two statements are contradictory: *Licence holders need to take reasonable steps to ensure that ammunition is not stored in such a way that a person who obtains access to the firearm also obtains access to the ammunition.*

*If ammunition is stored with the firearm then the firearm has to be stored in a way **that it cannot be discharged.***<sup>4</sup> *Methods of doing this include immobilising the firearm by way of a trigger lock, cable or other system to ensure that the firearm cannot be fired.*

*Ideally bolts and ammunition should be secured in a separate location from the firearms*

- This section is ambiguous in that it does not clarify how ammunition is to be stored.

- What is a reasonable step to take? Ie if the ammunition is in a locked box and a burglar breaches the firearms security - then they could easily breach the ammunition storage container security.

- keeping the bolts and ammunition in a different secure location is a recipe for disaster. We have seen so many examples of firearms that the bolts have been lost by doing this.

		<p><b>H) Page 9 Security for Endorsed Firearms</b></p> <ul style="list-style-type: none"> <li>- ‘~~ to demonstrate the material will perform to the same standard or exceed the level of 6mm mild steel. ‘How does a shooter do this? What level of certification will the Police require? This is going to cause great confusion in the future.</li> <li>- ‘The steel safe, box or ~~ a five lever mortise dead lock that engages the door with the frame at least at two or more points. If the door on a steel box is of a reduced size (for example, intended for pistols, only one locking mechanism may be sufficient. ‘</li> <li>- Where has the requirement come from for engaging on 2 points?</li> </ul> <p>- Yes, the 5 lever lock requirement has been in place for years. But not the requirement for 2 or more securing points.</p> <p>- You are risking causing thousands of otherwise compliant safes being rendered unlawful, causing an unnecessary cost to otherwise law abiding shooters.</p>
31	Name withheld	<p><u>Secure Storage</u></p> <p>I believe the current version “New Zealand Firearms Licence Secure Storage Requirements: Police Policy and Practice January 2018 is fit for its current purpose.</p> <p>May I suggest that some additional thought should be given to the future possibilities?</p> <p>For example (e.g.)</p> <p>a/ young people / students etc. who want to hunt etc but current personal circumstances prohibit them owning a firearm under current rules e.g. living in a hostel or other accommodation where installation of secure storage is not allowed. They could have a license endorsed to only allow them to borrow or hire a firearm.</p> <p>Perhaps a short term solution when returning from a hunt etc and while the individual is present, the firearm could be secured in a suitable container attached to a large item of furniture until it could be taken to a licensed owners storage or a commercial facility the following day.</p> <p>B / A centralized storage facility or alternate storage. E.g. for apartment dwellers where a tenancy agreement prohibits owners securing a firearm or firearms to adequate "long term" secure standard. Firearms could be stored elsewhere.</p> <p><u>I think the existing draft would be improved if</u></p> <p>1/ some provision for steel framing (now common) could be included.</p> <p>where the requirement is "The cabinet is fixed to the building on two surfaces" and</p>

		<p>"...50mm of thread is engaged in the rigid support." this fixing is not achievable in walls with steel framing. Perhaps in cases of steel framing, fixing to the wall with 4 or 6 screws or fixing to 2 walls and the floor could be recommended.</p> <p>2/ Generally where dimensions are given it would be preferable to define the maximum allowable spacing. e.g. "steel rods set at 200 mm centres" could be "steel rods set at no more than 200 mm centres"</p> <p>3 / Steel Safes, Boxes or Cabinets Currently... "If the door on a steel box is of a reduced size (for example, intended for pistols, only one locking mechanism may be sufficient. However the construction of the door is constructed in a way that prevents distortion due to a direct force or leverage." I think this statement could be clarified. Perhaps remove the full stop and replace the words "However the construction of" with the word "when", then close the brackets.</p> <p>"Where the steel safe, box or cabinet is bolted to a wooden floor, it should be bolted through the floor to a 6mm mild steel plate (or equivalent), which exceeds the floor area of the cabinet and is retained on at least two floor joists in the sub-floor space."</p> <p>3 / Steel Safes, Boxes or Cabinets continued I think this statement could be improved by the addition of the words "where practical". That is "Where the steel safe, box... wooden floor, it should where practicable, be bolted through ..." Fixing in upstairs rooms comes to mind.</p> <p>4/ Rooms of Stout and Secure Construction etc Hinge security bolts: These were intended for use when doors could not be hung on the inside with three heavy duty hinges. (A change in punctuation changed the meaning of the early 93 Regs. draft). When doors are in fact hung on the inside then hinge security bolts are superfluous.</p> <p>Current use of the word "must" (as shown below) is inappropriate when used under the sub heading "Police recommend ". that is, " Rooms of Stout and Secure Construction</p> <p>Police <b>recommend</b> the following additional security:</p>
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		<ul style="list-style-type: none"> <li>• Doors should be constructed of a material equal in security rating of 6 mm mild steel strength. For example, solid wood construction, no less than 40 mm thick, covered on the outside with a sheet of steel no less than 16 gauge/1.52mm thick (applied to fully cover the door and bent to afford fixing to all edge surfaces), or armour coated or laminated glass protected by substantial grilles or other shutter covering. The doors, where practicable, should be hung on the inside with three heavy duty hinges. Hinge security bolts <b>must</b> be fitted. Where doors are required to be hinged on the outside, componentry <b>must</b> be fitted or adapted to prevent the removal of hinge pins or component parts. Door framing should include a rebate and be of a substantial construction to resist splitting or forcing and fitted to prevent prising or stretching. "</li> </ul> <p>Perhaps the following would be an improvement:</p> <p>"Doors should be constructed of a material equal in security rating of 6 mm mild steel strength. For example, solid wood construction, no less than 40 mm thick, covered on the outside with a sheet of steel no less than 16 gauge/1.52mm thick (applied to fully cover the door and bent to afford fixing to all edge surfaces), or armour coated or laminated glass protected by substantial grilles or other shutter covering. The doors, where practicable, should be hung with three heavy duty hinges having pivot pins on the inside (opening in). Where doors are required to be hinged with pins on the outside, hinge security bolts <b>must</b> be fitted and componentry <b>must</b> be fitted or adapted to prevent the removal of hinge pins or component parts. Door framing should include a rebate and be of a substantial construction to resist splitting or forcing and fitted to prevent prising or stretching."</p>
32	James Henry	<p>The use of "Requirements" on the title page clearly indicates that the contents are 'required' and appears to be a transparent effort to define the Police Policy and Practice as such requirements.</p> <p>There is little excuse for the over-reach as the Statutory Regulations are clearly presented in the document and, hopefully, understood by Police.</p> <p>Regulation 19(2)(a) Outlines the "reasonable steps" to ensure that firearms are secured against theft. Yet Police see fit to make up what this means to them – and couch it in definitions NOT IN LAW.</p> <p>The "recommendations" will clearly be seen as mandatory "requirements" by inspecting staff – the document is entitled "Secure Storage <u>Requirements</u> for Firearms Licence Holders" no less.</p>

		<p>The Regulation clearly states: "... secured against theft" and NOT "Preventing the theft of firearms" as stated in the Assessment of Secure Storage section of Policy and Practice.</p> <p>While discretionary decision regarding "conditions" and "security" do exist by implication in the Statute the "requirements" masquerading as "recommendations" are so precisely defined that they fetter any discretion allowed. Such fettering of discretion has been clearly addressed in Practical Shooting institute v Commissioner of Police (1990) and in light of that can only be thought to have been done knowingly by Police.</p> <p>What Statute empowers Police to inspect security BEFORE the issue of a Firearms Licence? (As the requirement is a condition of that licence and simply cannot exist in the individual case before the licence is issued). Pankhurst J in Lincoln v Police (2012) Statements of Claim clearly opined that as such the inspection and requirement for possession of security BEFORE the issue of the licence and/or Endorsement was "Premature"</p> <p>There is no requirement in Statute for firearms secured in racks having trigger locks fitted or bolts removed – let alone stored elsewhere. No requirement is Statute that the rack be made of steel or that a "6mm Stainless Steel security cable be used to lock the firearms in the rack. These 'recommendations' simply have the appearance of fettering discretion.</p> <p>Security for Endorsed Firearms section simply magnifies the "recommended" pseudo "requirements" made up by Police and NOT mentioned in Statute.</p> <p>Where does the "6mm mild steel" come from? Where does the "5-Lever Deadlock" come from? (it is noted that the copyright British Standard has now disappeared from the "recommendations" ... and Police website). Where does the recommendation that the "door handle break off under leverage" come from? If any of those "recommendations" are not met will Police acceptance of security be refused?</p> <p>Likewise "100mm concrete with minimum strength 20 MPa" and "10mm reinforcing steel rods set at 200mm centres come from? Much of the "recommendations" appear to have been made up by Police – they most certainly DO NOT appear in the Statute.</p> <p>Also under General Security of Building – NONE of the "recommendations" exist in Statute that</p>
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		<p>can be seen – once again made up by Police. The installation of security cameras that can be monitored remotely is nowhere mentioned in Statute.</p> <p>The questions which must be asked are: Is the use of “recommendations” simply disingenuous and designed to allow inspectors and or Police to impose them as Policy and Practice “requirements”?</p> <p>And: Will such “requirements” stand up to Appeal and /or Judicial Review?</p>
33	COLFO	<p><b>SECURE STORAGE REQUIREMENTS FOR FIREARM LICENSE HOLDERS (APRIL 2018 DRAFT)</b></p> <p>COLFO believes the draft document is largely fit for purpose but could benefit from some further amendment to address specific areas of concern.</p> <p>Overall, COLFO maintains that all firearms owners should continue take a diligent approach to securing their firearms as required by law. However, COLFO sees criminal activity in New Zealand as being the underlying issue in relations to firearms offenses in general, and the loss of firearms through theft more specifically. Accordingly, COLFO continues to advocate for increased Police responsiveness and pressure on criminal organisations in order to bring criminals to justice where firearms offenses occur or are suspected to have occurred.</p> <p>In relation to the draft document itself, COLFO acknowledges the effort made by NZ Police to create a document which is specific where specificity is required, but also offers flexibility and case-by-case consideration by Arms Officers where it is appropriate to do so.</p> <p>Relating to fitting cabinets, containers or receptacles to two surfaces, COLFO believes there are instances where such a situation may not be warranted. For example, fitting a storage means on to a concrete floor using four fasteners, may achieve the same or security than if fixing to a timber framed wall using four fasteners, or to both surfaces using two fasteners each. Such means may be necessary if a landlord will not permit creating holes in walls in a property tenanted by a license holder (whereas concrete can be grouted or filled and is less visible).</p> <p>Further, acknowledging there is inherent flexibility in the document, it is also prescriptive in specifying the use of chemical set or expanding bolts. Screw bolts are another solution which should be specifically included. Screw bolts are used in construction industry for attaching buildings to concrete slabs. The same points of discussion also apply to steel cabinets, containers or receptacles in the draft document.</p>



		<p>COLFO therefore recommends inclusion of a paragraph such as: <i>“Cabinets, containers or receptacles may be fixed to a single surface using the number of fittings normally expected to be fitted to a second surface, on a case-by-case basis. Such cases may include but are not limited to instances where a landlord will not permit wall or floor fixings or penetrations, the interference or presence of subfloor or internally routed services. Such services may include water, electricity, gas, data services or heating”</i>.</p> <p>Such a paragraph ensures those firearms owners who are not property owners are able to achieve compliant standards of security as far as reasonably practicable.</p> <p>Regarding rooms of stout and secure construction, it is stated that <i>“The Police does (sic) not accept the installation of louvre windows”</i>. COLFO submits that the type of window is irrelevant and this statement should be removed. So long as the remainder of the specified requirements are met (ie steel rods and welded cross ties), <i>any</i> window is still made of glass and offers no inherent physical security anyway. The physical security is achieved in the use of cross tied steel rods.</p> <p>COLFO notes that there is no mention of transitional or non-residential security in these storage requirements. This relates to situations where perhaps a firearms owner is unable to achieve security requirements in their leased or owned apartment due to body-corporate imposed constraints or having a non-permissive landlord or property manager or someone relocating / transitioning to a new residence. University students provide another example. This could also extend to collectors who lack the storage and require another equally endorsed license holder to store the firearm or restricted item. It also acknowledges the availability of occupational and organisational storage in the case of military, police, pest controllers / cullers, club shooters or collectors, and the role they can have in ensuring firearms security.</p> <p>COLFO believes there is merit in such provisions being included in the final version of secure storage requirements. COLFO offers to consult directly with Police to arrive at an acceptable statement for inclusion in these security requirements. Such an outcome would facilitate the use of employer / service armouries as acceptable storage solutions where supported by those organisations. It will also ensure clubs and ranges can support their members where members are unable to achieve their own security due to residential limitations outlined above. Such an approach empowers community stakeholders to support the intent of the Arms Act 1983 in</p>
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		<p>ensuring safety and security of firearms. Of note, such means of offsite storage are already partially allowed for in Police forms such as the POL67h, they are just not clearly linked to policy.</p> <p>Police must also ensure that the cost of complying with security requirements is kept manageable for all members of the community. If security requirements become unaffordable through over-prescribing physical requirements there is a risk that non-compliance will be seen as an option for those without financial means. Compliance requirements must therefore remain cost effective to reduce the risk of firearms being lost into to the grey or black market.</p> <p>In summary,</p> <p>COLFO thanks Police for their efforts and consultation but looks forward to continuing the collaborative and consultative process to arrive at a final draft that meets the needs of the firearms community as best as possible while ensuring appropriate security of firearms is maintained. The changes recommended above may seem relatively minor but COLFO views them as small changes that could go a long way to ensuring secure storage policy is fit for purpose and offers pragmatic solutions for licensed owners.</p>
34	Nicole McKee	<p>Thank you for the opportunity to respond to the draft secure storage requirements.</p> <p>Our thoughts are:</p> <ol style="list-style-type: none"> <li>1. The cost of any added security needs to be affordable for all the community. We would like to see encouragement of recommended upgrades rather than enforcement of unaffordable expectations for some low income firearm users.</li> <li>2. I do not see any remedy for those that are unable to fit security to their place of abode e.g. those living in University hostels, apartment dwellers or rented accommodation.</li> <li>3. The prescriptive specification of the type of bolts that can be used does not encompass all possible suitable and available attachments.</li> </ol> <p>Overall the document has obviously had much thought go into it and we do see the overarching need to secure firearms legally and adequately taking precedence throughout. We also believe that there is some room within the guidelines to make some small allowances. Perhaps the ability to make allowances needs to be spelled out in the above thoughts 1-3.</p>
35	Name withheld	<p>I would like to make the following submission with regard to the issue of changing the current storage of firearm requirements.</p>

		<p>The current requirements work well for legitimate firearm owners. The only issue that exists is the management of illegal possession of firearms in particular with people with criminal intent in particular those who does not legally have the right to possess a firearm as they have not obtained the licence.</p> <p>Please focus on the real problems</p> <ol style="list-style-type: none"> <li>1) that is illegal possession and thieving of firearms and non-punishment.</li> <li>2) and turn up and investigate crime scenes of stolen guns and then they may get convictions above the 8%</li> <li>3) encourage our courts to actually punish those found WITH our stolen guns</li> <li>4) Focus on criminal behaviour not on making current legitimate firearm licence holders criminal by creating a new raft of compliance.</li> </ol> <p>Thank you</p>
36	Kent Wheeler	<p>This draft is far better than the previous draft, however I disagree that there is titled storage "Requirements". A requirement will be defined by the law and this document is more accurately a guideline or recommended practice.</p>