



Firearms Registry Consultation – Submission Analysis

Summary report of submissions from public consultation

10 November 2022



ALLEN + CLARKE

PROACTIVE RELEASE



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Table of Contents

Acknowledgements	4
Executive Summary	7
Introduction	8
Background	8
Structure of the Report	9
Methodology	10
Quantifying Submitters & Responses	10
Part A: Summary of submissions, key themes and comments.....	11
Overview of how submissions were received and coded.....	11
Consultation Process	11
Out of Scope	11
Limitations	12
Demographics (from Citizens Space).....	12
Summary of Submissions.....	14
Part B: specific responses to questions	16
Particulars Concerning Licence Holders: Questions 1 – 6.....	16
Arms items to be recorded in registry: Questions 7 - 9	21
Particulars of items to be recorded in the registry: Questions 10 – 12	23
Particulars of items to be recorded in the registry: Questions 13 – 15	26
Identification marking: Questions 16 -21	28
Transfers of arms items by firearms licence holders: Questions 22 – 24	31
Transfers of items by dealers: Questions 25 – 27	34
Transfers by mail order and internet sales: Questions 28 – 30	36
Sales of ammunition by ammunitions sellers: Questions 31 – 33	38
Imports: Questions 34 – 36	40
Exports: Questions 37 – 39	42
Manufacture: Questions 40 – 42	44
Loss, theft or destruction: Questions 43 - 45.....	45
The transfer of ammunition: Questions 46 – 48	47
Consents to conduct business at a gun show: Questions 49 – 51	49
The modification of a firearm: Questions 52 – 54	51
How firearms licence holders will provide details for the registry: Questions 55 – 57	54
How transfers by dealers and ammunition sellers will be entered into the registry: Questions 58 – 60	56
Timing: Questions 61 - 63.....	59
Prescribed persons: Questions 64 – 69	61
Events activating provision of information: Questions 70 -72	64
Items to be recorded: Questions 73 -75	67

Particulars to be recorded: Questions 76 -78.....	69
Time after a relevant event in which to provide information: Questions 79 – 81	71
Final date for the provision of information by licence holders on all specified arms items they possess: Questions 82 – 84.....	73
Shooting Clubs: Questions 85 – 87	74
Shooting ranges: Questions 88 – 90	76
Executors/administrators of deceased persons and power of attorney: Questions 91 – 93	78
Accessing information in the registry: Questions 94 – 96	80
Duration of records in the registry: Questions 97 – 99.....	83
Application of regulations to the Department of Conservation: Questions 100 -102.....	85
Privacy of information in the registry: Question 103.....	86
Final Comments: Question 104	88

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Acknowledgements

Police wish to thank all the people and organisations who gifted their time to make thoughtful and often extensive submissions.

Ehara taku toa I te toa takithi, engari taku toa he toa takitini

We can achieve much together

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Summary of Submissions



- **Most** submitters said that the proposals won't achieve the intended benefits and outcomes. Some submitters highlighted that there was little evidence to suggest that a registry would achieve the intended benefits of making the community safer. They often pointed to how registries in other jurisdictions have not worked. Others noted that providing information about licensed firearms owners and dealers would not improve or address existing issues around criminal behaviour or illegal possession and use of firearms.



- **Most** submitters said the registry was not a good use of time, money and resources, and did not believe it would be adequately maintained. Some cited examples of failed registries and other firearms recording systems both in New Zealand and around the world. Some cited how long it currently takes to get a firearms licence application processed to demonstrate why they doubt the Police have the capacity to manage a registry.



- **Most** submitters raised concerns about the privacy and security of the information to be held within the registry. In particular, these submitters expressed a lack of confidence in the Police's ability to keep information in the registry safe, secure, and accurate, and were worried about the registry being vulnerable to hacking or that personal information would otherwise 'fall into the hands of criminals.' These submitters often referred to how government agencies are a key target for hackers, and pointed to examples of privacy breaches such as the Auckland Central Police Station and recent hacking attempts on medical centres in New Zealand.



- **Many** submitters expressly and implicitly supported the principle of firearms safety and keeping firearms out of the "wrong" hands. However, some submitters said the resources entailed in the proposed registry would be better utilised elsewhere, because the people who are going to use the registry were not the cause of issues with firearms safety, crime and violence.



- **Many** submitters expressed a view that the regulations are being imposed on law-abiding citizens instead of gangs and criminals.



- **Some** submitters offered constructive feedback, which mainly centred around specific proposals or simplifying the registry or reducing its scope. For example, information (i.e., addresses, storage location) should be stored separately from personal and other details (like names, firearm types etc) in the registry to increase security for firearm licence holders. The details of a firearm license holder, their addresses where they store their firearms, the details of what firearms they own need to be stored separately, but should be linked by a common identification number. The separation of this information would increase the security for the firearm licence holder.



- **Some** submitters said that the proposal requires too much information to be provided for the registry. These submitters suggested that much of the information that the Police require is already available or captured as part of the firearms license registration and vetting process, and that the proposed registry will unnecessarily duplicate this information. Submitters also cautioned that requiring the proposed amount of information would be overly time-consuming and burdensome for firearm license holders.



- **Some** submitters said that the proposals were too repetitive, complicated, or difficult to understand, and suggested that the registry should be kept simple and straight forward.



- **Some** submitters also raised concerns with the proposed requirement to provide addresses and other details relating to firearm and ammunition storage locations. Submitters considered that having itemised firearm information linked to names and addresses risked the safety of firearms licence holders and their families and could result in a 'shopping list' for criminals.

PROMPT

Executive Summary

- New Zealand Police, Ngā Pirihimana o Aotearoa (New Zealand Police) commissioned Allen + Clarke to support the analysis of submissions received on proposals related to the establishment of the Firearms Registry, which has come into being as a consequence of changes made to the Arms Act 1983 (the Act) through the Arms Legislation Act 2020.
- The consultation period ran from 31 August – 12 October 2022. This report summarises views submitted on the proposals in the discussion document. New Zealand Police received 413 submissions.
- There was consistent opposition from submitters to proposals set out in the consultation document.
- Most submitters were opposed to the establishment of the registry and restated this opposition in their responses to the specific questions in the submission form. As Parliament has legislated for the establishment of the registry, and the consultation relates to the design of the registry, such comments are out-of-scope. However, they have been included in the report for completeness.
- Most submitters raised concerns about privacy, data security and the risks that data security breaches pose to their personal safety.
- Many submitters said that the registry would not enhance or improve firearms safety or affect criminals that possess firearms.
- Many submitters raised concerns regarding the proposed information disclosure requirements which they considered to be excessive and overly burdensome. They suggested using existing sources and channels for gathering the necessary information for the registry.
- Some submitters said that the proposals were too repetitive, complicated, or difficult to understand, and suggested that the registry should be kept simple and straight forward.

Introduction

Background

In 2020, changes were made to the Arms Act 1983 (the Act) through the Arms Legislation Act 2020 to strengthen the control and regulation of firearms. The Act provides that the changes come into force progressively over a period of three years from when it received the Royal assent. The next group of changes will come into force on 24 June 2023 and provide for the establishment of a registry (the registry) to store and link information on all firearms and other arms items and their licence holders. This will enable greater and more centralised oversight of the number and location of firearms and other arms items in New Zealand.

From 24 June 2023, the Act requires licensed persons and any other persons specified in regulations to provide up to date information for the registry on all items in their possession at the time when specified circumstances take place during the first five years of the registry. Specified circumstances include when applying for a licence or endorsement, changing address, or buying or selling arms or ammunition.

Data held by the registry will enable greater visibility of the firearms environment, so that Police will be better able to carry out its regulatory and enforcement role in relation to the possession and use of firearms.

The Act enables certain agencies (Department of Conservation, New Zealand Customs Service (Customs) and Ministry of Foreign Affairs and Trade (MFAT)) to access the registry in the interests of improving decision making on matters related to arms items. Over time, the registry is expected to become a complete record of all arms items held by individual licence holders, including storage locations of the items.

What this consultation is about

Regulations must be made to provide clear and comprehensive directions on what is required to meet the new legislation on the arms registry. Police sought the public's views on proposed regulations that set out:

- the specified arms items and the details on those items to be recorded in the registry
- the obligations of licence holders and those in possession of specified arms items to provide information to Police for inclusion in the registry
- associated provisions that support these changes, including a final date by which licence holders must have registered all their specified arms items.

The general aims of this consultation are to:

- ensure the regulations are fit for purpose and minimise any unintended consequences; and

- give stakeholders, in particular firearm licence holders, the opportunity to understand and shape the proposed regulations.

Police published a discussion document (Phase three: Consultation on the Firearms Registry) at the end of August 2022 along with a submission form covering 104 questions (not including demographic questions). Submissions closed on 12 October 2022. The Police engaged Allen + Clarke to analyse the submissions received.

Structure of the Report

This report has two parts. Part 1 sets out, and summarises, overarching themes and comments from the consultation feedback at a high level. Key themes are structured to reflect the framework set out in the discussion document and consultation questions. Part B provides submitters' feedback on each question in the consultation submission document, including out-of-scope comments.

Allen + Clarke have sought to present views without interpreting or assessing validity against the Act. The terminology used by respondents in their feedback has been used.

Methodology

Submitters' identities are not provided in this report

- This report does not provide any identifiable information about individual submitters. Quotes and submissions have not been attributed to an individual submission.
- The submission form provided submitters with the option of not publishing their submission and removing their personal information from the submission. It also stated that if the Police receive a request under the Official Information Act 1982 (OIA), they would, where practicable, discuss that with an affected submitter before responding to the request.

Quantifying Submitters & Responses

When referring to submitters, the report quantifies support for positions based on the classifications in table 1 (below). These classifications are relative to the number of responses received for that question. For example, whether a question received several hundred responses or less than 100, the same terms are used relative to the proportion of responses to that question.

Table 1: Classification of submission data

Classification	Definition
Few	< 25% of submitters
Some	26% to 45% of submitters
Many	46% to 75% of submitters
Most	76% < of submitters

However, as submitters that did not fully agree with a proposal cited numerous reasons (i.e. each submitter could give several comments) the following classifications have been used in part B of this report:

Table 2: Part B - Classification of responses for not fully agreeing

Classification	Definition
Few	< 10% of responses
Some	11% to 29% of responses
Many	30% to 49% of responses
Most	50% < of responses

Part A: Summary of submissions, key themes and comments

Overview of how submissions were received and coded

Table 3: How many submissions were received

How submissions were received	Number	%
Through Citizen Space	281	67.5
Email to Police consultation inbox ¹	135	32.5
Total	416	

Consultation Process

The Firearms Registry proposals are the latest in a series of consultations following the Arms Legislation Act 2020. A discussion document was published at the end of August 2022 with submissions due by 12 October 2022.

There were three methods available for submitters:

1. email
2. using Citizen Space, an online consultation platform
3. standard post.

The Police indicated that options 1 or 2 were preferred methods for making submissions. Most submitters used option 2, which meant that submissions were received, collated and processed faster than options 1 and 3.

The consultation document expressly set the parameters for submissions on this issue (i.e. scope). Despite this there were several submissions that were, technically, out of scope. These are covered below.

Out of Scope

The consultation document was clear that the scope of the consultation was confined to the proposed changes relating to the registry to the Arms Regulations 1992. Items that are set in the Act such as the establishment of the registry, access to the registry by agencies, offences related to the registry or on the transitional provisions in schedule 1, clause 14 of the Act are out of scope.

¹ This includes handwritten submissions that were transcribed into an electronic format.

Many submitters made comments that were out of scope. More detail on this can be found in Part B.

Limitations

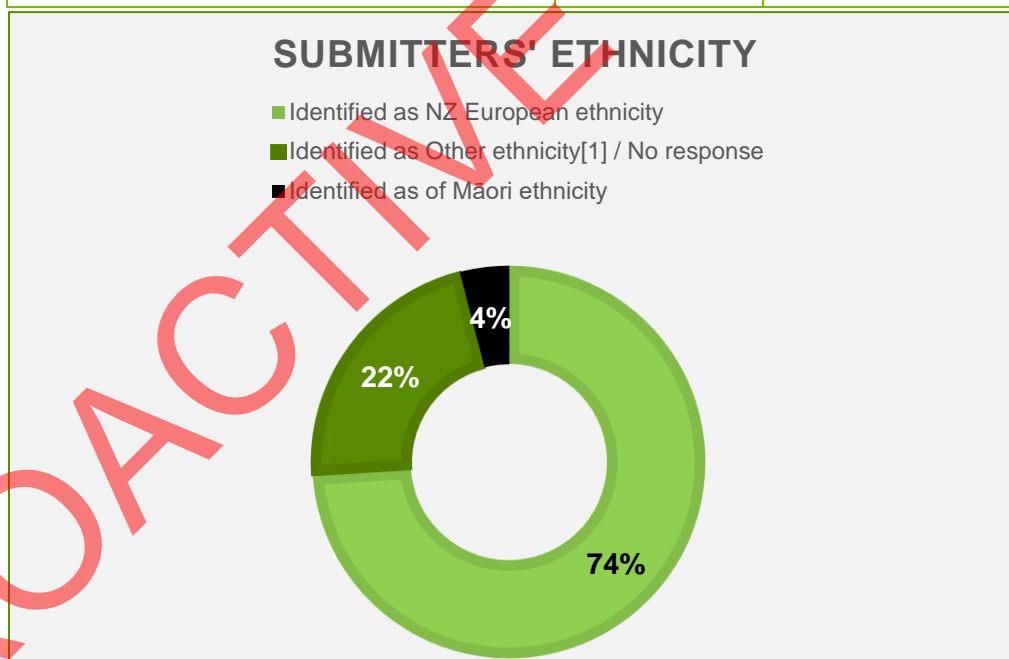
In some instances, a submitter's initial answer to a proposal would contradict their following response. This may result in the statistics not accurately reflecting the proportion of submitters who agree or disagree with the proposal. These statistics should be read in accordance with the contextual comments to ensure a clear understanding.

People that responded by email did not generally provide any demographic information, so the statistics below are only from Citizen Space submitters.

Demographics (from Citizens Space)

Table 4: Demographics

Demographic category	Number of submitters	Approximate ratio of submitters
Identified as NZ European ethnicity	208	74%
Identified as Other ethnicity ² / No response	63	22%
Identified as of Māori ethnicity	10	4%



² For "other (please write)" there were a total of 39. A number of these were written as "Kiwi", "New Zealander", and a range of other comments including names of geographical areas such as "Non-USA", "Otago", "Auckland", etc. There were also more answers written in this box (90) than submitters who chose this option (39), indicating that this box has answers reflected in the other options chosen (for example, NZ European may have been chosen and "New Zealander" written in this box).

Table 5: Demographics

Demographic category	Number of submitters	Approximate ratio of submitters
Male	248	88%
Female	14	5%
Other / No response	18	7%

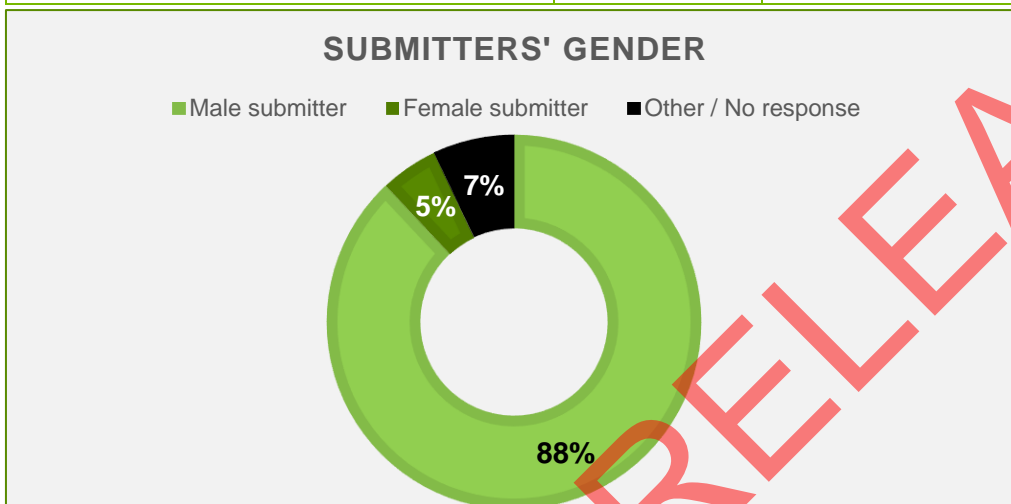
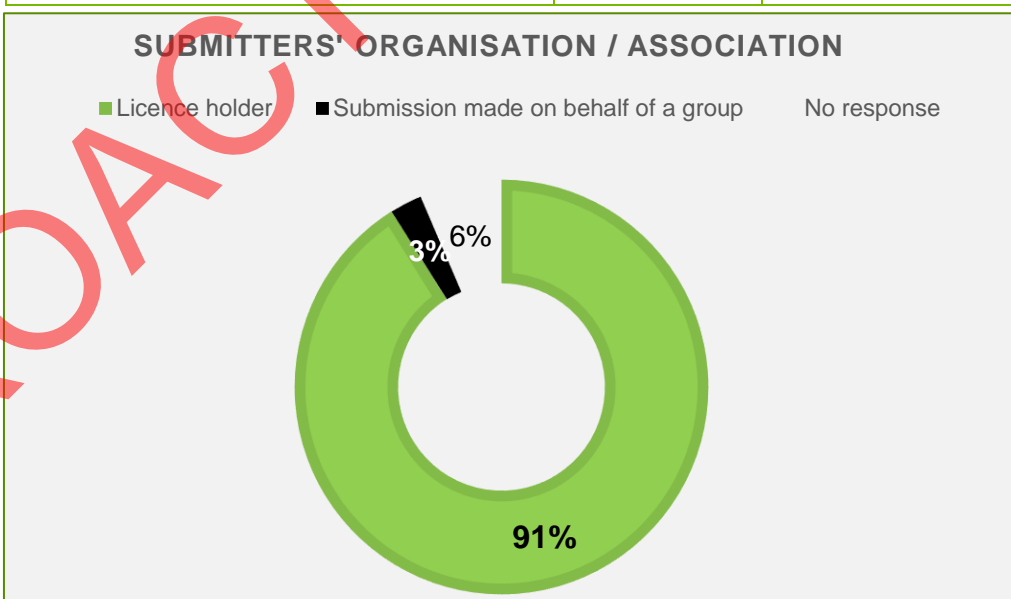


Table 6: Demographics

Demographic category	Number of submitters	Approximate ratio of submitters
Licence Holder	256	91%
Submission made on behalf of a group	7	3%
No response	18	6%



Summary of Submissions

- **Most** submitters said that the proposals won't achieve the intended benefits and outcomes. Some submitters highlighted that there was little evidence to suggest that a registry would achieve the intended benefits of making the community safer. They often pointed to how registries in other jurisdictions have not worked. Others noted that providing information about licensed firearms owners and dealers would not improve or address existing issues around criminal behaviour or illegal possession and use of firearms.
- **Most** submitters said the registry was not a good use of time, money and resources, and did not believe it would be adequately maintained. Some cited examples of failed registries and other firearms recording systems both in New Zealand and around the world. Some cited how long it currently takes to get a firearms licence application processed to demonstrate why they doubt the Police have the capacity to manage a registry.
- **Most** submitters raised concerns about the privacy and security of the information to be held within the registry. In particular, these submitters expressed a lack of confidence in the Police's ability to keep information in the registry safe, secure, and accurate, and were worried about the registry being vulnerable to hacking or that personal information would otherwise 'fall into the hands of criminals.' These submitters often referred to how government agencies are a key target for hackers, and pointed to examples of privacy breaches such as the Auckland Central Police Station and recent hacking attempts on medical centres in New Zealand.
- **Many** submitters expressly and implicitly supported the principle of firearms safety and keeping firearms out of the "wrong" hands. However, some submitters said the resources entailed in the proposed registry would be better utilised elsewhere, because the people who are going to use the registry were not the cause of issues with firearms safety, crime and violence.
- **Many** submitters expressed a view that the regulations are being imposed on law-abiding citizens instead of gangs and criminals.
- **Some** submitters offered constructive feedback, which mainly centred around specific proposals or simplifying the registry or reducing its scope. For example, information (i.e., addresses, storage location) should be stored separately from personal and other details (like names, firearm types etc) in the registry to increase security for firearm licence holders. The details of a firearm licence holder, their addresses where they store their firearms, the details of what firearms they own need to be stored separately, but should be linked by a common identification number. The separation of this information would increase the security for the firearm licence holder.
- **Some** submitters said that the proposal requires too much information to be provided for the registry. These submitters suggested that much of the information that the Police require is already available or captured as part of the firearms licence registration and vetting process, and that the proposed registry will unnecessarily duplicate this information. Submitters also cautioned that requiring the proposed amount of information would be overly time-consuming and burdensome for firearm licence holders.
- **Some** submitters said that the proposals were too repetitive, complicated, or difficult to understand, and suggested that the registry should be kept simple and straight forward.
- **Some** submitters also raised concerns with the proposed requirement to provide addresses and other details relating to firearm and ammunition storage locations. Submitters considered

that having itemised firearm information linked to names and addresses risked the safety of firearms licence holders and their families and could result in a 'shopping list' for criminals.

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Part B: specific responses to questions

Particulars Concerning Licence Holders: Questions 1 – 6

Q 1	<p>Do you agree that regulations require the following information to be provided or confirmed for the registry?</p> <p>a. In the case of a firearms licence holder:</p> <ol style="list-style-type: none">full name, date of birth, residential address, postal address (if different), contact phone number and email address (if any)the number and date of expiry of the licence heldevery endorsement on the licenceevery condition on the licence or on any endorsement that is additional to conditions imposed by the Act or regulationsthe addresses of all locations where they store specified arms items and ammunition in their possession, and the capacity of each of those storage locationswhether any specified arms items are being stored in a mobile home, campervan or caravan unit that is being used as the licence holder's temporary or permanent home, details of these homes/units, and the total number of firearms that each unit has the capacity to holdwhether they are an ammunition seller, and if so, the address where the ammunition they intend to sell is storedconfirmation that they have separate storage for ammunition at the places where firearms are storedthe name and contact details of the licence holder's health practitioner (if they applied for a licence on or after 24 December 2020, when this became a legislated requirement). <p>b. In the case of a dealer's licence holder</p> <ol style="list-style-type: none">full name, date of birth, residential address, postal address (if different), contact phone number and email addressthe number and date of expiry of the licencethe registered name of the business (if any), the trading name (the name by which the business's customers know it) (if any), and the New Zealand Business Number (if any)the current business address and, where the dealer is operating from more than one place of business, the addresses of those other places of business, the names of the managers of those places of business holding a dealer's licence specific to that place of business and the number of firearms that each place has the capacity to storethe address of any separate warehousing/storage facilities they operate and the total number of firearms that each such place has the capacity to storeevery endorsement on the licenceevery condition on the licence or an endorsement that is additional to conditions imposed by this Act or regulations made under section 74the names of employees handling arms items or ammunition at the dealer's place of business, their firearms licence numbers and any endorsements on those licences that they have in their capacity as an employee.
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■ No ■ Yes ■ Partially Agree

Reasons for not fully agreeing	
Most submitters said	<p>Most submitters who disagreed or only partially agreed with this proposal raised concerns with the privacy and security of the information to be held within the registry.</p> <p>In particular, these submitters expressed a lack of confidence in Police's ability to keep information in the registry safe, secure, and accurate, and were worried about the registry being vulnerable to hacking or that personal information would otherwise 'fall into the hands of criminals'. These submitters often referred to how government agencies are a key target for hackers and pointed to examples of privacy breaches such as the Auckland Central Police Station and recent hacking attempts on medical centres in New Zealand.</p> <p>Some of these submitters also raised concerns with the proposed requirement to provide addresses and other details relating to firearm and ammunition storage locations. Submitters considered that having itemised firearm information linked to names and addresses risked the safety of firearms licence holders and their families and could result in a 'shopping list' for criminals.</p>
Some submitters said	<p>Some submitters disagreed with the inclusion of specific items proposed. This included:</p> <ul style="list-style-type: none"> A few of these submitters considered it unnecessary to capture detail around the storage of firearms and ammunition, including the location and capacity of said storage. Submitters reiterated that including storage location details poses a safety risk to firearms licence holders. Others commented that providing details on storage capacity was irrelevant or difficult to gauge as the manufacturer's recommended capacity was not always accurate. A few of these submitters did not agree with providing information about a licence holder's registered health practitioner. They noted that this requirement raises patient confidentiality issues, may disincentivise people from speaking with their doctor, and does not take into account those who do not have a single, consistent health practitioner.
A few submitters said	<p>A few submitters considered that the proposal requires too much information to be provided for the registry. These submitters suggested that much of the information that Police require is already available or captured as part of the firearms licence registration and vetting process, and that the proposed registry will unnecessarily duplicate this information. Submitters also cautioned that requiring the proposed amount of information would be overly time-consuming and burdensome for licence holders.</p>

Alternative suggestions (if applicable)

A few submitters provided comments on additional suggestions or ideas relating to this proposal.

These submitters generally commented that requirements of the registry should be kept simple and to a minimum so that compliance does not become burdensome on firearm licence holders and dealers.

Keep the registry details to the absolute minimum. This will make compliance easier and mistakes less frequent. (Email submitter)

Other suggestions included:

- Linking firearms items to a licence number only and ensuring that personal information such as names and storage addresses are kept separately. Submitters suggested that this could support improved security for firearms licence holders should the registry be hacked.
- Provide a definition of 'ammunition' to support the compliance of safe ammunition storage. Submitters called for greater clarity around whether the proposed requirements referred to components of ammunition or assembled ammunition.
- Provide guidance on how the proposed requirements will impact on firearms that are shared property, such as when firearms are owned by a business (pest control / farm).

Key quotes

"The track record of government departments, including the police, with regards to keeping information secure and private, is poor. Should the above information be leaked online - and it probably will be - firearm owners will be at increased risk of targeted burglary and criminals will know where to steal guns and ammunition." (Online submitter)

"I am seriously worried about the very real possibility of a security breach of the registry and then all my personal details and lists of firearms getting into the wrong hands and basically giving out a 'shopping list'." (Online submitter)

"We have no confidence in the ability for police to maintain the information to the required level of accuracy for it to be reliable and trustworthy as an authoritative source." (Email submitter, Organisation)

"What relevance is there in knowing what size safe you have and how many firearms it 'could hold'? I could have a '5 gun' safe but still squash 8 guns in it or I could have a 10 gun safe but only store 1 rifle in it. And that information is useful for what?" (Online submitter)

"Many, if not most, of us now do not have an actual GP. We access health care by a clinic. That means we do not necessarily see the same doctor twice. My doctor(s) could not pick me out of a line-up. They do not know me and I do not know them well enough to trust them with anything beyond basic hard medical facts. Now that it is going to potentially impact on firearm licensing, one would be a fool to tell them anything that would indicate instability. The unintended consequence of this is that firearms licence holders will withhold information from their medical practitioner." (Online submitter)

Out of Scope

Many submitters who provided comment on this question raised concern with or opposed the implementation of a registry in its entirety. These submitters gave a range of reasons for their opposition for a registry, including:

- Some submitters highlighted that there was little evidence to suggest that a registry would achieve the intended benefits of making the community safer. They often pointed to how registries in other jurisdictions have not worked. Others noted that providing information about licensed firearms owners and dealers would not improve or address existing issues around criminal behaviour or illegal possession and use of firearms.

A registry will not make the community safer as only law abiding LFO's will comply, and they are not the issue. (Email submitter, Organisation)

- A few submitters raised that maintenance of a registry can be a costly exercise. They noted that, given the lack of evidence that a registry would contribute to public safety, establishing and maintaining a registry would therefore be a waste of taxpayer dollars.
- A few submitters noted that the previous system for registering firearms was sufficient and that a new registry would introduce unnecessary additional burdens on law-abiding firearms licence holders.

Q 4	<p>Do you agree that regulations require the registry to record the following details?</p> <p>a. For licence holders – any change of personal details (i.e. name, residential address, postal address, contact details, safe storage address, or health practitioner)</p> <p>b. For dealers – any change of business address.</p>
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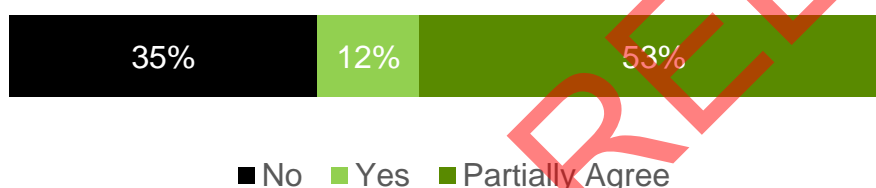


■ No ■ Yes ■ Partially Agree

Reasons for not fully agreeing	
Many submitters said	Many submitters who disagreed or only partially agreed with the proposed requirements to record specified details reiterated their views from the previous question (question 1).
Some submitters said	<p>Some submitters again raised concerns with privacy and security of the information to be provided to the registry. They noted concern that the Police would be unable to keep personal information safe, that hacking or information leaks would be inevitable, and that this would create a safety risk for licensed firearms holders and their families should information ‘get into the wrong hands’.</p> <p>Some submitters repeated how they do not agree that details of a firearm licence holder’s health practitioner should be a requirement.</p>
A few submitters said	<p>A few submitters highlighted that a process already exists for providing information to Police when details change, and cautioned around duplicating the provision of information.</p> <p>A few submitters were confused by the wording ‘safe storage address’ and called for consistent use of terminology.</p>
Alternative suggestions (if applicable)	
<p>A few submitters called for simplification of the requirements of the registry and for only minimal information to be required.</p> <p>Others recommended ensuring that terminology in the regulations was consistent with legislation, particularly in relation to amending ‘safe storage address’ to read ‘secure storage’.</p>	
Key quotes	
<p><i>“As mentioned on the previous question, this information is too dangerous to collate. It will endanger law abiding citizens lives. Corporations and governments who spend billions on cyber security can’t keep their databases secure – there is no way our police department can keep these citizens safe with this registry.”</i> (Online submitter)</p> <p><i>“The requirement to record any change in health practitioner seems unnecessary and intrusive.”</i> (Online submitter)</p> <p><i>“Personal detail changes need to be reported already. There is a process around it. Just follow the process and enforce the rules.”</i> (Online submitter)</p> <p><i>“We note the inconsistent use of language. ‘Safe storage address’ differs from ‘secure storage’ cf. s 24 of the legislation and the Firearms and Ammunition Secure Storage Guidance. To avoid doubt, consistent language needs to be used.”</i> (Email submitter, organisation)</p>	

Arms items to be recorded in registry: Questions 7 - 9

Q 7	<p>Do you agree that the regulations require the registry to record particulars about the following arms items possessed by each firearms licence holder and each dealer's licence holder?</p> <ul style="list-style-type: none"> a. firearms (including prohibited firearms) – excluding antique firearms b. prohibited magazines c. major firearm parts [the action (frame, receiver, or upper and lower receiver) of a firearm, the frame of a pistol, and a calibre conversion component or kit of a pistol] d. restricted airguns e. restricted weapons f. pistol carbine conversion kits.
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Reasons for not fully agreeing	
Most submitters said	<p>Most submitters who disagreed or only partially agreed with this proposal raised concerns about specific arms items to be recorded in the registry. It was largely suggested that requirements be kept simple to encourage compliance, and that only the firearm type, make, model, and serial number should need to be recorded.</p> <p>Some of these submitters also suggested that major firearms parts and conversion kits should not be recorded at all. These submitters stated that the addition of 'parts' would make the registry complicated and unmanageable. They also noted that some items such as a calibre conversion kit or carbine conversion kit cannot be converted to a firearm without registered pistols and thus capturing these kits within the proposed requirements is not necessary.</p> <p>A few of these submitters stated that airsoft and restricted airguns should be exempt from the firearms registry. They explained that although 'restricted airguns' do fall under the definition of 'Arms Items' they are not 'Firearms' for the purposes of the Act.</p> <p>Others also stated that any firearm that is in working order should be included in the registry, which would include antique firearms.</p>

Many submitters said	Many submitters reiterated previously raised data privacy concerns and implications for the safety of firearm licence holders and their families. They considered that the amount and type of information proposed would create a potential 'shopping list for criminals' to target households with firearms.
Some submitters said	<p>Some submitters considered that the proposal adds unnecessary administration and compliance work for the Police and firearms owners without any tangible benefits.</p> <p>Some submitters commented on the need for greater clarity on the definition of terms used and called for these terms and definitions to align with what is currently in the Arms Amendment Regulations 1992. Terms that require more clarification included:</p> <ul style="list-style-type: none"> • major firearms parts, • antique firearms, • prohibited firearms.
A few submitters said	A few submitters highlighted that some of the requirements requested would overburden the licensed firearm owner and can be considered unnecessary information gathering. A few other submitters stated that the registry is requesting more information than Parliament intended.
Alternative suggestions (if applicable)	
<p>A few submitters provided additional comments or suggestions relating to this proposal. These included:</p> <ul style="list-style-type: none"> • Inserting a subclause where the proposed regulations make reference to obligations to record 'Restricted Airguns' in the registry. This subclause should state that the requirement: does not apply to – a restricted airgun designed for use in airsoft or paintball sports. • Include 3D printed guns/pistol and antique firearms to be subject to requirements. • Require the licence holder to keep their own record of details. • Remove the term prohibited from the wording. 	
Key quotes	
<p><i>"There is no need to record c. Major parts. The Act does not call for this and was not parliaments intent. The purpose of the register is to track through life complete firearms and would be overburdened trying to track parts as well."</i> (Email submitter, Organisation)</p> <p><i>"Penalising the law-abiding by creating a list of places where the non law-abiding can obtain firearms is likely to create more law-breakers."</i> (Online submitter)</p> <p><i>"A gun registry only holds information on law abiding gun owners and not criminals who steal or import them. It is a beauratic [sic] overreach that causes a lot of work for limited gain."</i> (Online submitter)</p> <p><i>The registering of firearms has been a failure before I don't see why it will not fail again.</i> (Online submitter)</p>	
Out of Scope	
<p>Many submitters who provided comment on this question said that they disagree with the requirement to record firearms and major firearm parts in a registry, other than restricted or prohibited items, as is currently the practice. A few submitters suggested that criminals are the issue and thus lawful licensed firearm holders should not be penalised. A few other submitters stated that the focus should be on vetting the users.</p>	

Particulars of items to be recorded in the registry: Questions 10 – 12

- Q 10 Do you agree that regulations require licence holders to provide the following information for the registry?
- a. If the item is a firearm, the:
 - i. make (manufacturer's name)
 - ii. model
 - iii. identification marking (serial number), according to guidelines
 - iv. type (shotgun, rifle, pistol, rifle/shotgun combination, assault rifle, submachine gun, machine gun or other)
 - v. action (bolt, lever, single-shot, pump, break-open, full-automatic, semi-automatic, select-fire, revolver, select-fire, rocket/missile, muzzle-loading, pre-charged pneumatic, or other)
 - vi. calibre or gauge
 - vii. for firearms with a non-detachable magazine, the magazine type (integral or tubular) and its capacity
 - viii. identifying features if any (damage, repairs, marks, carvings, attachments, oddities, etc)
 - ix. if requested, a photo of the item, according to guidelines.
 - b. If the item is a restricted airgun, the:
 - i. make (manufacturer's name)
 - ii. model
 - iii. identification marking (serial number), according to guidelines (unless it is a restricted airgun designed for use in airsoft or paintball sports)
 - iv. type (replicas/look-alikes, pistol, prohibited firearm, or restricted weapon)
 - v. if requested, a photo of the item, according to guidelines.
 - c. If the item is a pistol carbine conversion kit, the:
 - i. make (manufacturer's name)
 - ii. model
 - iii. identification marking (serial number), according to guidelines
 - iv. type
 - v. if requested, a photo of the item, according to guidelines.
 - d. If the item is a prohibited magazine, the:
 - i. make (manufacturer's name)
 - ii. calibre/gauge
 - iii. type (box, rotary, stick, other)
 - iv. capacity (number of rounds)
 - v. identification marking (serial number), according to guidelines
 - vi. identifying features, if any.
 - e. If the item is a restricted weapon, the:
 - i. make (manufacturer's name)
 - ii. model
 - iii. type (mortar, mine, cannon, grenade or missile launcher, artillery, or other)
 - iv. identification marking (serial number), according to guidelines
 - v. if requested, a photo of the item, according to guidelines.

	<p>f. if the item is a major part, a description of the part, its make, model and (unless it is incorporated or integrated into a firearm) identification marking (serial number), according to guidelines</p> <p>g. for all items, the address of the location where they are stored.</p>
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■ No ■ Yes ■ Partially Agree

Reasons for not fully agreeing	
Most submitters said	<p>Most submitters who disagreed or only partially agreed with this proposal raised concerns with particulars of items to be recorded in the registry.</p> <p>Many of these submitters disagreed with the amount of information and detail requested. They considered that information on the type, make/model, serial number, and calibre is sufficient to uniquely identify every firearm – therefore, the action, magazine type, and identifying features are unnecessary. Furthermore, submitters stated that trying to record damage, repairs, marks, and oddities is meaningless and overly complicated. A few submitters suggested that airsoft and paintball replicas should be excluded from all points of reference to the firearms registry.</p> <p>A few of these submitters noted that location and storage information are already available in the Police NIA system and should not need to be repeated for every firearm. Others suggested that including the requirement for identifying features does not improve safety and can lead to disagreement on interpretation. A few submitters disagreed with the requirement to provide photographs.</p> <p>A few submitters suggested that ID markings are often of limited value in the tracking of firearms as criminals will simply remove the serial number / identifying marks on the item before use or sale.</p>
Many submitters said	<p>Many submitters reiterated previously raised concerns around data privacy and security. This included concerns around how storing information in the registry could contribute to data being wrongfully published or accessed by unauthorised people, and concerns regarding Police's inability to store data securely and safely. Submitters were worried about detailed firearm information becoming a shopping list for criminals.</p>
Some submitters said	<p>Some submitters provided general comments relating to the information captured in this proposal. These submitters generally considered that collecting the proposed information would not be beneficial to public safety, and that the amount of information would increase the risk of inaccuracy of the registry, as well as being significantly more than what is required to identify a firearm.</p>

A few submitters said	<p>A few submitters stated that the collection and maintenance of all information listed in the proposal is going to require a high investment of time and resources which they considered to be an unreasonable imposition on licence holders.</p> <p>A few submitters suggested that information for prohibited firearms/magazines is already available to the Police as part of the application process and therefore there is no need to record anything additional.</p>
Alternative suggestions (if applicable)	
<p>A few submitters provided additional comments or suggestions relating to this proposal. These included:</p> <ul style="list-style-type: none"> • Amend the requirement for photos to ensure that only rare or highly modified firearms require photos. • Find a way to store location information separately, using only the licence number, so that if the main register is illegally accessed or hacked, the storage information is not available. • Require that only the most basic information, such as whether someone has a firearms licence, should be accessible by Police. For more detailed information, there must be an event number or warrant attached to the enquiry. • Make it the responsibility of the firearms licence holder to keep a record of what firearms they hold, if they sell or dispose of these firearms then a record of the sale/disposal must be made. Submitters suggested that this would prevent any data breaches and leaking of personal information. • Ensure that guidelines for markings on prohibited items not exclude what has previously been done by owners. If Police wish to change requirements now, they should be responsible for the cost of doing so. 	
Key quotes	
<p><i>“This proposal requires far more information than is needed to identify any given firearm. It appears to be harvesting information for no current purpose. It should only be the minimum relevant information.”</i> (Online submitter)</p> <p><i>“The list of particulars are significantly more than what is necessary to identify a firearm. The type, make, model, calibre and serial number are sufficient for identification. The more information, particularly without definition, that is required increases the inaccuracy of the registry.”</i> (Email submitter, Organisation).</p> <p><i>“Law abiding New Zealanders are not the problem, do better background checks and stop people who are not fit and proper from getting a FAL in the first place.”</i> (Online submitter)</p> <p><i>“Having a registered firearm will not prevent a person from using for an unlawful purpose.”</i> (Online submitter)</p>	
Out of Scope	
<p>Many submitters who provided comment on this question raised concern with or opposed the implementation of a registry in its entirety. A few submitters stated that they disagree with the recording of firearms information on a central registry unless the items are restricted or prohibited items.</p>	
<p>A few submitters stated that they do not support other agencies having access to the database as this increases the risk towards firearm licence holders.</p>	

Particulars of items to be recorded in the registry: Questions 13 – 15

Q 13	Do you agree that regulation 7 (which sets out the particulars of arms items that dealers must record when they receive, manufacture, or deliver these items) should be amended to align with the particulars of arms items that are proposed above to be recorded in the registry?
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Reasons for not fully agreeing

Many submitters said	<p>Many submitters who disagreed with this proposal highlighted that the proposed system is too complex which can create non-compliance. Some of these submitters emphasised that they would like to keep the status quo.</p> <p>These submitters highlighted that dealers already keep a record of what they have received and sold and can confirm that those items were sold to correctly licensed people.</p> <p>A few of these submitters stated that too much information was being sought by the proposal for which they suggested has no demonstrable purpose.</p> <p>For example, submitters considered that details about category parts was unnecessary to include as the registry should only require information about firearms that are fully assembled (not the individual parts of a firearm).</p>
A few submitters said	<p>A few submitters raised concerns regarding data privacy and the risk of information in the registry being leaked to the public and used for criminal intent. Due to this risk, a few submitters suggested that the information recorded should be kept at a minimum level for security reasons. A few other submitters suggested that the process is too time consuming with high-cost implications. It was suggested that the paperwork for the dealers and the police would be high and that the costs associated to handle the extra workload could be reallocated elsewhere.</p>

Alternative suggestions (if applicable)

A few submitters suggested that Police should open a seamless portal/interface based on the information already recorded by Police and without imposing any additional work, effort, or compliance cost on the dealers. However, this suggestion was challenged by a few other submitters who stated that even if there were a secure portal, the overall record-keeping procedures are likely to be vulnerable and lack oversight controls and data protection measures.

Other suggestions included:

- Ensure that responsibility rests with the dealers, not licence holders.
- Ensure that information recorded in the registry for dealers and other licence holders is the same and is limited to the minimum needed to adequately describe an individual firearm.
- State clearly that airsoft and paintball guns are exempt from the registry.

Some key quotes

“Dealers already have a detailed stock list that is available on request to the police. Further gathering of information is unnecessary.” (Online submitter)

“It is not necessary to make such changes as the current system works well as per proven record. Most of the firearm dealers follow the rules, regulations and laws when doing their business as per proven record.” (Online submitter)

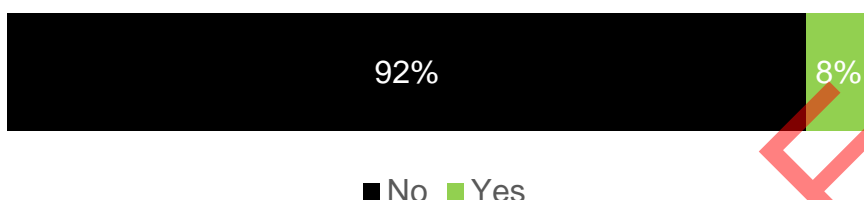
“The paperwork for the dealers and for the police will be extensive and serve no useful purpose. The amount of money this will consume could make real change if allocated elsewhere.” (Online submitter)

Out of Scope

Many submitters who provided comment on this question raised concern with or opposed the implementation of a registry. A few submitters suggested that the registry is not necessary as the details recorded by the dealer are sufficient.

Identification marking: Questions 16 -21

Q 16	Do you agree that regulation 12(4) (which currently applies only to dealers) should be amended to require all firearms licence holders receiving specified arms items to place identifying markings on any items that don't already have such markings, these markings to conform with guidelines issued by Police?
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Reasons for not fully agreeing	
Most submitters said	<p>Most submitters who disagreed with this proposal raised concerns that identification markings add no benefit for public safety. Some of these submitters stated that factory manufactured firearms already contain markings sufficient to identify each firearm. They explained that where factory manufactured firearm components do not have markings, this is because they are interchangeable and easily manufactured by after-market suppliers. Many submitters highlighted that criminals are likely to remove any serial numbers or other identification markings before use. Due to this it has been suggested that there is no benefit to increasing the regulatory burden on firearm licence holders.</p> <p>A few of these submitters agreed that the proposed requirements and guidelines should only apply where there are no markings. They suggested that non-factory manufactured firearms and components may have a requirement for an identifying mark to be inscribed but that this needs to be clearly defined in the regulations. Submitters suggested that wording could state: 'a manufacturer's identifying mark plus a manufacturer's unique identifying firearm serial number.'</p>
Many submitters said	<p>Many submitters also highlighted that the identification markings would ruin the aesthetics of the firearm and therefore may devalue some items. They suggested that firearm licence holders should not have to deface potentially collectable firearms by applying additional markings to legitimately produced, potentially historical, and/or collectable firearms.</p>
Some submitters said	<p>Some submitters expressed that the proposal is too complicated as most do not have the knowledge or tools to make the proposed identifying markings. They also suggested that the process is too time consuming and would result in unnecessary financial or administrative burdens on licence holders.</p>
A few submitters said	<p>A few submitters stated that in the absence of the mentioned 'Police guidelines' that they could not provide an informed answer.</p>

Alternative suggestions (if applicable)

A few submitters suggested that any new markings required to be applied to firearms without existing markings (such as serial numbers) should be out of sight and tailored to the specific firearm so that the new markings do not adversely affect collector value. For example, submitters considered that foreign alphabets and numbers can be translated into English letters and numerals for the registry record without any further markings on the firearm. Submitters considered this to be especially relevant for collectible firearms which should be able to retain their original markings only to prevent devaluing the item.

Other submitters suggested that in the case of a firearm having no serial number, it would be better to have a photograph of the firearm supplied in lieu of a number.

Key quotes

“That illicit holders of firearms often attempt to remove serial and other identification details from firearms confirms the absence of utility of this measure as suggested by your regulations drafters.” (Email submitter)

“There is no public safety benefit in this measure, it simply places another burden on owners.” (Online submitter)

“Most firearms that do not have specific markings are unique and rare items, and adding permanent markings damages and alters a piece of history.” (Online submitter)

“Noted too are the different terms ‘Identification markings’ and ‘identifying features’ – the latter are not defined. So strictly, damage arising from handling and storage could be argued to constitute an identification marking.” (Online submitter)

Out of Scope

A few submitters who provided comment on this question raised concerns with or opposed the implementation of a registry with the rationale that having this additional information would not deliver the proposed registry benefits.

Q 19	Do you agree that the terminology in the regulations referring to “identification numbers” would be amended to “identifying marking (for example, a serial number) according to guidelines”?
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■ No ■ Yes

Reasons for not fully agreeing	
Many submitters said	<p>Many submitters who disagreed with this proposal expressed concern that the terminology 'identifying marking' was too vague and open to subjective interpretation. To address this, some submitters suggested using the term 'serial number' as this term is well understood and simplifies the requirement. These submitters also stated that existing serial numbers should be sufficient and that existing markings should be used wherever possible.</p> <p>Other submitters agreed that the terminology 'identifying markings' provides for a wider range of markings, including existing markings. These submitters suggested that terms need to be clearly defined in regulations.</p> <p>Furthermore, submitters recommended that the proposed Police guidelines for markings should accommodate the current markings provided by manufacturers.</p>
Some submitters said	Some submitters considered that there are no benefits arising from this proposal as any identifying marks or identification numbers can be tampered with and removed by criminals.
A few submitters said	A few submitters said that requiring identification markings and engraving on unmarked firearms parts would be costly and time consuming, with little benefit being added to the firearm owner
Alternative suggestions (if applicable)	
A few submitters who provided additional comments or ideas suggested that serial numbers could consist of a mixture of alphanumeric characters. They noted that this also provides a greater range of marks than a purely numeric serial number. Furthermore, a few of these submitters suggested that 'identifying markings' should take into account foreign alphabets and symbols.	
Key quotes	
<p><i>"This is not very clear as to what would be required, also the use of this when serial numbers can already be removed."</i> (Online submitter)</p> <p><i>"We agree there needs to be consistency of language used and 'identifying markings' provides for a wider range of markings, including existing markings."</i> (Online submitter)</p>	
Out of Scope	
Some submitters who provided comment on this question raised concern with or opposed the implementation of a register in its entirety providing the rationale that having the additional information would not deliver the proposed registry benefits. Submitters also stated that all firearms have serial numbers apart from the firearms that criminals have in possession.	

Transfers of arms items by firearms licence holders: Questions 22 – 24

- Q 22 Do you agree that regulations require firearms licence holders to provide the following details to Police on transfers of arms items for inclusion in the registry?
- a. In the case of items received (other than temporary transfers):
 - i. the date the item was received
 - ii. the name of the person from whom the item was received
 - iii. the number of the firearms licence of the person from whom the item is received except in the case of a restricted airgun received from a person who is of or over the age of 18 years
 - iv. particulars of the item as set out in the proposal in part 4.1 section C.
 - b. In the case of items supplied (other than temporary transfers):
 - i. the date the item was delivered
 - ii. the name of the person to whom the item was delivered
 - iii. the number of the firearms licence of the person to whom the item is delivered except in the case of a restricted airgun received from a person who is of or over the age of 18 years
 - iv. in the case of a pistol, prohibited firearm, prohibited magazine, pistol carbine conversion kit, or restricted weapon delivered to a person who requires a permit to possess it, the date and number of the permit
 - v. particulars of the item as set out in the proposal in part 4.1 section C.



■ No ■ Yes ■ Partially Agree

Reasons for not fully agreeing	
Most submitters said	<p>Most submitters who disagreed or only partially agreed with this proposal raised concerns about the specific list items. These comments included:</p> <ul style="list-style-type: none"> Parliament has already determined the ‘most dangerous’ firearms and the appropriate level of restriction to be placed on such items. The particulars of the items received/transferred should be limited to the type, make/model, calibre and serial number. A simple transfer should only require a licence number for each party and the serial number of the firearm(s). A few of these submitters also stated that acknowledgement of the transaction from the Police would be of value too. A few submitters stated that in the case of a restricted or prohibited firearm, the Permit to Possess date and Permit number should be included. Restricted airguns should be removed as a firearms licence is not required for any airgun unless the person is under the age of 18.
Many submitters said	<p>Many of these submitters suggested that Section C uses inconsistent language, “identifying features.” A wider term to “identification markings” may cause confusion about what is required. For example, it was questioned whether damage to a firearm could be classified as an identification marking.</p> <p>Many of these submitters also considered that requiring the particulars of the item to the level of detail in Section C contributes no benefit to public safety.</p>
Some submitters said	<p>Some submitters stated that the proposal requires too much unnecessary information and may create inconsistencies leading to unreliable data. Some submitters suggested that storing this level of information, especially alongside personal details, serves only to leave it open to misuse. There were also concerns among these submitters that more detail increases the risk of criminals using the registry as a shopping list.</p> <p>A few submitters raised the concern that NZ Police have a proven track record of not keeping firearms licence holders’ information secure.</p>
A few submitters said	<p>A few submitters highlighted that the Police already have vetting processes and background checks in place for Firearm licence holders, so if they are a licence holder they are approved to own and use these weapons and should be able to transfer them back and forth as required.</p>
Alternative suggestions (if applicable)	
<p>A few submitters recommended that the process be made similar to the sale and purchase of a motor vehicle. Another suggestion was to set a finite timeframe for the retention of this information.</p>	

Key quotes

“NZ Police already have vetting processes and background checks in place for Firearms licence holders, so if they are a licence holder they are approved to own and use these weapons – and should be able to transfer them back and forth as required.” (Online submitter)

“Because if/when I purchase another firearms that just opens up another avenue for criminals to hone in and use my firearms and my family as a target – I am vehemently opposed to being made into a target like this. I treat my firearms licence with huge respect and it is gutting that avenues are provided for criminals to so easily get access to my information.” (Email submitter)

“The above proposal will be a logistical nightmare. For example, if Fred buys a rifle from Bob, then Fred has to provide police with details as listed under 22.A. In addition, Bob is required to inform police details of the sale to Fred. The proposal does not cover other situations, such as the involvement of a third party when seller and buyer live in different parts of the country.” (Email submitter)

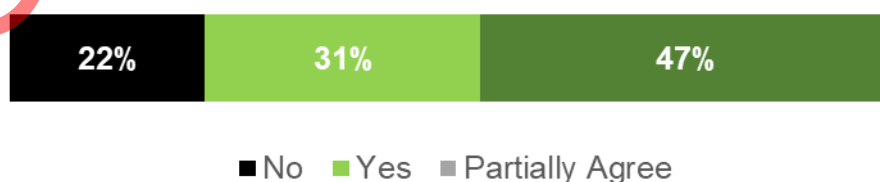
“Can you imagine a criminal who has stolen a firearm coming in to tell the police he has on sold it to Mr Smith. ‘Yeah... I stole it from a house in Stratford, didn't get the fella's firearms license, I'm selling it to Smith... Nah he hasn't got a license.’” (Online submitter)

Out of Scope

Some submitters who provided comment on this question raised concern with or opposed the implementation of a registry in its entirety. The main reason provided by these submitters was that the registry presents a risk to public safety if the data is leaked or otherwise made available to those with criminal intent.

Transfers of items by dealers: Questions 25 – 27

- Q 25 Do you agree that regulations require dealers to provide Police with the following details on transfers of arms items for inclusion in the registry?
- a. In the case of items received:
 - i. the date the item was received
 - ii. the name of the person from whom the item is received (unless the item is an airgun or a firearm, pistol, pistol carbine conversion kit, prohibited item, or restricted weapon and the item is surrendered within five days by the licensed dealer to a member of the Police, in accordance with section 59A(2))
 - iii. the number of the firearms licence of the person from whom the item is received, unless:
 - (i) the item is a pistol, prohibited item, or restricted weapon and the item is immediately surrendered by the licensed dealer to a member of the Police within five days; or
 - (ii) the item is a restricted airgun received from a person of or over the age of 18 years
 - iv. particulars of the item as set out in the proposal in question 10.
 - b. In the case of items delivered:
 - i. the date any item was delivered
 - ii. the name of the person to whom an item is delivered
 - iii. except in the case of a restricted airgun delivered to a person who is of or over the age of 18 years, the number of the firearms licence of the person to whom an item is delivered
 - iv. in the case of a pistol, prohibited firearm, prohibited magazine, pistol carbine conversion kit, or restricted weapon delivered to a person who requires a permit to possess it, the date and number of the permit
 - v. particulars of the item as set out in the proposal in question 10.



Reasons for not fully agreeing	
Most submitters said	<p>Most submitters who disagreed or only partially agreed with this proposal raised concerns with the quantity of information required and the lack of obvious benefits to public safety. They considered that the information required in this proposal would be overly burdensome, time-consuming, and expensive for dealers to maintain.</p> <p>These submitters commented on the difficulty of consistently updating a large number of details into the registry. They said that this could lead to incorrect data entry resulting in dealers being unfairly penalised for administrative errors.</p>
Many submitters said	<p>Many submitters said that all necessary details on the transfer of arms are already recorded by dealers and are accessible to Police without the need for it to be put into the registry.</p>
Some submitters said	<p>Some submitters expressed concern around data security and the possibility of this information being leaked, wrongfully published, or accessed by unauthorised people.</p>
Alternative suggestions (if applicable)	
<p>Some submitters provided comments on additional suggestions or ideas relating to this proposal. These suggestions included:</p> <ul style="list-style-type: none"> • Simplify the process and reduce the amount of information required in the registry • Use firearm licence numbers instead of personal information, such as names • Change the wording to “surrender to a Police Station,” rather than the proposed “surrender to a member of Police.” • Remove airguns and paintball replicas from being subject to requirements • Define “transfer” to ensure the requirement does not capture items received by dealers for repair or alteration. 	
Key quotes	
<p><i>The interpretation of this extra data will not be consistent, hard to record and maintain with any accuracy ongoing, leading to massive time and resources costs, without any safety benefit to the community (Online Submitter)</i></p> <p><i>Every mistake will cause someone pain and suffering - the more regulation the more mistakes and suffering. It has no tangible benefit in non-dictatorial society and it's just unnecessary paperwork that will cause errors, corruption and drain resources. (Online Submitter)</i></p> <p><i>Seems an unnecessary overhead. Surely the recording of seller and buyer is sufficient. The way in which the transfer takes place (provided it complies with regulations) is irrelevant. (Online Submitter)</i></p> <p><i>Any information linking specific items to a name and address is exposing that person or dealer to a potential cyber-attack or fraud. The only link that should be necessary is a description of the item linked as transferred between licence numbers and the Police should concentrate on keeping those licence records safe. (Online Submitter)</i></p>	
Out of Scope	
<p>Most out of scope comments are entirely against the registry.</p>	

Transfers by mail order and internet sales: Questions 28 – 30

Q 28	<p>Do you agree that regulations would provide that:</p> <ol style="list-style-type: none"> where the transfer of an arms item is by mail order or internet sale, the following details need to be provided for inclusion in the registry? <ol style="list-style-type: none"> the details set out above for all transfers for the purchaser, the date of the authorisation form or authorisation confirmation from the registry for the seller the date of the authorisation form and the date of its receipt from Police or the authorisation from the registry. the above requirement does not apply to an arms item if: <ol style="list-style-type: none"> the purchaser has entered their details, the details of the seller, and details of the item into the registry online these details, including the licence status of the purchaser, or age of the purchaser if the item being sold is an airgun, are confirmed by the registry the final details of the sale and the particulars of the item sold (including a photo of the item, if requested) have been provided to Police online for inclusion in the registry.
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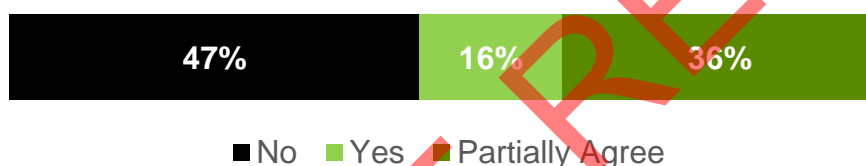
■ No ■ Yes ■ Partially Agree

Reasons for not fully agreeing	
Many submitters said	<p>Many of the submitters who disagreed or partially agreed to this proposal found the requirements to be unnecessary and redundant.</p> <p>Many submitters mentioned the forms that already require police authorisation and commented on the duplication of information if they were input it into the registry as well. Submitters said that this duplication would become too onerous on those who rely on internet or mail order sales of firearms and considered that this requirement would not benefit public safety.</p> <p>Many submitters also mentioned that the provision for a “photo to be provided (if required)” was unnecessary when other sufficient details are being recorded.</p>
Some submitters said	<p>Some submitters expressed their concerns around general data security, especially given the level of detail that is proposed to be captured in the registry. They considered that any information entered online could be at risk of a privacy breach.</p>

	Some submitters also mentioned that some people lack access to internet or cannot travel to see an arms officer easily, which could complicate the process further.
A few submitters said	A few submitters commented that the term “arms items” was too vague and said it should be clarified.
Alternative suggestions (if applicable)	
<p>There were a few submitters that made suggestions or ideas relating to this proposal.</p> <p>These submitters generally suggested creating a portal (possibly automated) that could verify the licence number of the purchaser and update the registry about the possible sale. After confirmation, the seller could then be notified that the firearms can be shipped.</p> <p>Other suggestions included:</p> <ul style="list-style-type: none"> • Introduce a double verification process at the start and completion of the sale • Allow the firearms to be shipped to a local police station for a small fee for pickup. Upon pickup, the Police could complete confirmation of the licensed purchaser. 	
Some key quotes	
<p><i>“Sales by internet or mail order already requires police approval to proceed. So, a record of these transactions is already in place.” (Email Submission)</i></p> <p><i>“Many of these details are already on the form and add nothing to the Information that is useful.” (Email Submission)</i></p>	

Sales of ammunition by ammunition sellers: Questions 31 – 33

Q 31	<p>Do you agree that regulations require that ammunition sellers provide the following details for inclusion in the registry?</p> <ol style="list-style-type: none"> The name of the person to whom any ammunition is sold, and their licence number The quantity and type of ammunition sold The date on which the seller hands over or dispatches the ammunition. <p>If, as proposed, these details must be provided online to Police for inclusion in the registry, ammunition sellers will not have to include that same information in a records book. See section 22E(2).</p>
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Reasons for not fully agreeing	
Most submitters said	<p>Most submitters who disagreed or partially agreed to this proposal mentioned how difficult it would be to keep accurate track of ammunition and found the proposal to be unnecessary and of no benefit for a firearms registry.</p> <p>Submitters commented on the large amounts of ammunition that is consumed for various activities (sometimes daily). They questioned whether proof would also need to be shown that the ammo was used, and if so, called for clarity around how it would be possible to provide such proof.</p> <p>Some submitters said the proposed requirements would add a lot of administration to transactions and but adds little benefit to the registry or public safety because the data will most likely be inaccurate due to the ammunition being consumed.</p>
Some submitters said	<p>Some submitters mentioned that the details for ammunition are already recorded by commercial ammunition sellers who question any large quantities purchased.</p>
A few submitters said	<p>A few submitters recommended that the term “ammunition sellers” be more clearly defined. They questioned whether the term included non-commercial sales between licensed firearm holders.</p>

Alternative suggestions (if applicable)

A few submitters made suggestions regarding this proposal. Generally, they said that the process would need to be electronically streamlined using the firearms licence number to connect the purchaser to the purchased products.

Other suggestions included:

- Allow the licence holder to only buy ammunition for the gun calibres registered to their licence
- Restrict the recording of ammunition to extremely large quantities
- Add a provision for ammunition sold under supervision e.g. an unlicensed shooter who borrows a range's firearms.

Key quotes

"Ammunition is either collectible or consumable. If collectible, it is not ever going to be utilized in any way other than a collection. If consumable, it won't stay around for very long so why clutter up a database with totally useless information." (Online Submitter)

"The Registry is for firearms. Ammunition is a consumable item and should not be recorded. To do so would be like trying to record the fuel purchased for a vehicle." (Online Submitter)

"This information is already gathered, and details are checked when buying ammo each licence user has different uses and the amounts of ammo needed a target shooter will use a lot more ammo than a hunter or someone that lives rurally will buy ammo on less occasions but buy bulk when they need it to save transport cost." (Online Submitter)

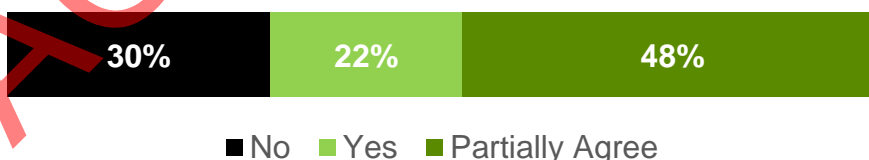
"You need to define 'ammunition seller'. Ammunition can be bought and sold by any licensed firearm holder" (Online Submitter)

Out of Scope

Many of the out of scope comments disagreed with the inclusion of ammunition without a given reason or oppose the registry in its entirety.

Imports: Questions 34 – 36

Q 34	<p>Do you agree that the following details need to be provided to Police for inclusion in the registry when an arms item or ammunition is being imported?</p> <ol style="list-style-type: none"> full name of the import permit holder address and occupation of the permit holder number of the permit issued under section 18 or 18AA of the Act name and licence number of the dealer if a dealer has acted as agent for the importer licence number of the import permit holder, unless the item is an airgun description and country of origin of the item imported, including the identification number of the item name of the manufacturer of the firearm, pistol, pistol carbine conversion kit, air pistol carbine conversion kit, restricted airgun, blank-firing gun, restricted weapon, magazine, prohibited part, or ammunition place at which the firearm, pistol, pistol carbine conversion kit, air pistol carbine conversion kit, restricted airgun, blank-firing gun, restricted weapon, magazine, prohibited part, or ammunition was landed in New Zealand date of importation date on which and the place at which the permit under section 18 or 18AA of the Act was issued particulars of the item as set out in the proposal in part 4.1 quantity of each item imported. <p>This information is to be provided in two stages:</p> <ol style="list-style-type: none"> first, when the importer has been advised by the supplier that the item has been dispatched (to confirm the items and the quantities and to record the serial numbers). This will be before it arrives in NZ; and on arrival in New Zealand, within 5 working days after the date on which the item is released by Customs to the importer or the importer's agent.
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Reasons for not fully agreeing	
Many submitters said	<p>Many of the submitters who disagreed or partially agreed said that this proposal provides no benefit and over complicates import procedures.</p> <p>These submitters explained that it would be too difficult and time consuming to record the proposed details for every import, especially for smaller orders and smaller arms items. A few of these submitters also raised that it would be logistically difficult for shooters who constantly travel and need to import their own firearms and items back into the country.</p> <p>Many submitters commented that recording the proposed details in the registry would contribute no benefit to public safety if the normal import procedures were being followed. They noted that criminals will continue to ignore the procedures already set in place and unlawfully smuggle items into the country regardless of whether these proposed measures are put in place.</p>
Some submitters said	<p>Some submitters expressed their concern about data security. These submitters considered that the inclusion of the proposed details in the registry increased the risk of the registry being targeted. These submitters also expressed their concerns over unnecessarily entering data into the registry multiple times and the possible liabilities of incorrect entry.</p>
A few submitters said	<p>A few submitters mentioned that the import permits already captures the proposed details and suggested the permit number be attached in the registry to the imported items.</p>
Alternative suggestions (if applicable)	
<p>A few submitters made suggestions regarding this proposal. These suggestions included:</p> <ul style="list-style-type: none"> • Design a one stage process where contact is made directly with the registry instead of having to make a separate phone call or visit. • Automate the process through the registry so data isn't collected multiple times. • Increase the timeframe for import notifications to 30 days. 	
Key quotes	
<p><i>"Apart from going through the correct import procedures cannot see how adding all this detailed information to a registry will make any contribution to public safety."</i> (Online Submitter)</p> <p><i>"A logistical nightmare. Do police really want to process paperwork every time someone buys a firing pin spring or a magazine cap screw?"</i> (Email Submitter)</p>	

Exports: Questions 37 – 39

Q 37	<p>Do you agree that the regulations should set out the following particulars that need to be provided when an arms item is being exported?</p> <ul style="list-style-type: none"> a. the name of the licence holder b. details of the items exported c. the licence number and in the case of pistols, restricted weapons, prohibited firearms or prohibited magazines, details of the endorsement and permit to which the item applies d. the name and address to which the items are being sent e. the date of export and proof of export f. the export controls permit number, where applicable (i.e. unless not needed by MFAT). <p>This is in addition to the requirement in section 38 (notifying Police at least 4 days ahead of the intended export).</p>
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Reasons for not fully agreeing	
Many submitters said	Many of the submitters that disagreed or partially agreed to the proposal requested greater clarification for different terms within the proposal. These submitters asked for a clear definition of the terms 'export' and 'details of the item', as well as clarification on what would be required for 'proof of export.'
Some submitters said	<p>Some submitters said there is no benefit to recording the proposed details when the item has left the country and is often sent to a port instead of the final destination. They said that this requirement over complicates the system and creates more 'unnecessary administrative work.'</p> <p>A few of these submitters commented that the proposed details are already recorded under the current export procedures and would be of no further benefit in the registry.</p>
A few submitters said	A few submitters expressed their concerns for duplicated data entries and said the process should be streamlined so the details don't need to be entered every time.

Alternative suggestions (if applicable)
<p>A few submitters made suggestions regarding this proposal.</p> <p>These suggestions included:</p> <ul style="list-style-type: none"> • create a temporary export pass which could be used for travelling with a firearm that will return to the country • use New Zealand Customs to verify exports • clearly define terms within the proposal, clarify requirements, and ensure wording is consistent with legislation.
Key quotes
<p><i>“More information on the ‘details of the item’ needs to be provided. We recommend that is applied consistently with the ‘identification markings’ proposal and uses only terms legally defined in the Act or regulation, to minimise confusion. I understand that ‘export’ is the colloquial term for taking an item overseas, but I recommend consistency with section 38. This section uses the term “removal”, not “export”. Export can be understood as removal from a country for the purposes of sale. Such a narrow definition would not align with the stated purposes of the Act.” (Online Submitter)</i></p> <p><i>“Simple provision needs to be made for temporary export and re-import of firearms, to cater for owners travelling overseas for competitions, hunting, etc.” (Online Submitter)</i></p> <p><i>“The wording in the proposal seems to suggest that recording an export will “de-register” the item from the holder, whereas importing one will “register” an item as being held by that person. Without a streamlined provision for temporary export, requiring things such as “country of origin” and “name and address to which the items are being sent” are going to create confusion and inevitably clutter the registry with nonsensical answers to nonsensical (in context) questions.” (Email Submitter)</i></p>
Out of Scope
Out of scope comments are total opposition to the registry.

Manufacture: Questions 40 – 42

Q 40	Do you agree that where an arms item is manufactured for sale, hire, lending or other supply, or for personal use, the details that need to be provided by the dealer or firearms licence holder are the particulars of the item as set out in part 4.1 section C, and the date on which the item's manufacture is completed?
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Reasons for not fully agreeing	
Some submitters said	Some submitters disagreed with this part of the registry as they expressed concern with the amount of information to be provided. These submitters said that the amount of data required for the registry was excessive and would create an administrative burden. They stated that it would make the registry inaccurate, create higher risk to licensed firearm holders if security was breached, and would not contribute to improved public safety. They also outlined that this information is already recorded at time of purchase and does not need to be duplicated. They explained that once a Firearm Licence Holder has been vetted and cleared by the Police then they have been declared a fit and proper person. Any additional information that needs to be recorded, has already been recorded by the dealer.
A few submitters said	A few submitters said that poorly defined terms and inconsistent language has been used throughout the proposal and section C. Submitters said this is unhelpful and said it would increase confusion.
Alternative suggestions (if applicable)	
Of the submitters who offered suggestions, most articulated that simplicity will be key for compliance. They recommended making the purpose clear, keeping the terminology simple, and making the process easy. Some suggested that the only particulars of an item needed for the registry is the type, make, model and ID mark. Others highlighted that the only required details should be those outlined by the Act.	
Key quote	
<i>"Not necessary to record details of non-vital items manufactured for a firearm as these pose no threat to public safety."</i> (Online submitter)	
Out of Scope	
Firearm licence holders can modify many parts of their firearms through access to 3D printers and small CNC machines and questioned how police will monitor this Common complaints among submitters were that criminals will not comply with the registry. Requests to exempt airsoft and paintball guns from the registry.	

Loss, theft or destruction: Questions 43 - 45

Q 43	<p>Do you agree that in the event of loss, theft, or destruction of a firearm, the following particulars need to be provided to Police for inclusion in the registry?</p> <ol style="list-style-type: none"> the date on which the firearm was lost, stolen, or destroyed the circumstances in which it was lost, stolen, or destroyed, including the last known location of the firearm such other particulars as may be required by the member of Police to whom the loss, theft or destruction is notified.
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Reasons for not fully agreeing	
Some submitters said	<p>Some submitters who disagreed or partially agreed were apprehensive about the benefit that reporting this data would give. These submitters outlined that the requirement to report loss, theft, or destruction already exists in section 66A of the Arms Act (1983).</p> <p>Submitters were also sceptical about whether this data would contribute to public safety as Police are often already aware of stolen firearms, but do not have the capacity to follow up.</p>
A few submitters said	<p>A few submitters identified that key terms and concepts used in the proposal (particularly Part C) were missing definitions which left the section open to interpretation. They said that Part C is too vague and that key terms such as 'other particulars' and 'destruction' need to be clearly defined. Specifically, submitters called for clarity around how 'destruction' and 'a project' differ and at what point a firearm is considered to be 'destroyed'.</p> <p>Others suggested that 'reasonably' should be inserted into the phrasing so that it reads "such other particulars may reasonably be required by the member of Police to whom the loss, theft or destruction is notified."</p> <p>A few submitters contested the amount of information needed for the registry and that the level of detail required goes beyond what the legislation requires.</p>

Alternative suggestions (if applicable)

A few submitters provided suggestions focused on responsibility.

One submitter suggested to make it the responsibility of the firearms licence holder to keep a record of what firearms they hold – if they sell or dispose of these firearms then a record of the sale/disposal must be made. Another disagreed with the idea of individuals being responsible for reporting the details and flagged that it should be the responsibility of the investigating police officer to report the information to the registry.

Other alternative suggestions proposed by few submitters included:

- For the registry to be of benefit to licensed firearm holders, it should be made clear that providing information to Police about theft, loss or destruction of a firearm is sufficient (and adequate records are produced) so that licensed firearm holders can rely upon the registry to make insurance claims.
- Only information required should be the date and how it was destroyed.

Key quote

“There is already a perfectly functional requirement for reporting the loss, theft and destruction of firearms by licensed firearms owners.” (Online submitter)

Out of Scope

Many submitters suggested that it should be a general rule that a stolen firearm is reported but does not need to be interlinked with a registry.

The transfer of ammunition: Questions 46 – 48

Q 46	<p>Do you agree that a licence holder importing ammunition or a dealer importing or supplying ammunition must provide the following details to Police?</p> <p>a. If a firearms licence holder:</p> <ul style="list-style-type: none"> i. the date of the import ii. the type and quantity of ammunition imported iii. the number of the permit issued under section 18. <p>b. If a dealer:</p> <ul style="list-style-type: none"> i. the date of the import or supply ii. the type and quantity of ammunition imported or supplied iii. for ammunition imported, the number of the permit issued under section 18 iv. the name of the person to whom the ammunition was supplied by the dealer and their firearms licence number and expiry date. <p>As with arms items, it is proposed that dealers must provide details of ammunition sales to Police for inclusion in the registry, then those need not be recorded in a record book.</p>
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Reasons for not fully agreeing	
Most submitters said	<p>Most submitters considered that it would not be tenable for a dealer or firearm licence holder to record every ammunition sale or to provide the proposed specified details to Police. They considered that providing information on ammunition would be impractical, inaccurate and difficult to enforce.</p> <p>These submitters explained that ammunition does not contain serial numbers so there is no advantage to security or increased public safety through recording ammunition. They also noted that the information will be “quickly out of date” as ammunition is a consumable and expendable good.</p>

A few submitters said	<p>A few submitters stressed that data on ammunition imports should not be duplicated as it is already required through Import Permits and Customs Tariff Number 93.</p> <p>A few submitters identified that definitions were missing for key concepts. They called for greater clarity on the following terms:</p> <ul style="list-style-type: none"> • 'dealer' • 'arms' • 'ammunition seller' • 'ammunition components' • 'ready to use ammunition' • 'unusually large' in the section 'so that unusually large purchases can be identified'.
Alternative suggestions (if applicable)	
<p>A few submitters provided additional comments or suggestions on the type of information that should be recorded. These submitters suggested that records should only include an individual's unique identifier (such as licence number) as personal information like names and addresses of firearms licence holders is accessible via the Police NIA system if required. They also suggested that a firearms licence holder should only have to notify police of ammunition imports if they exceed a threshold (eg, more than 1000 rounds).</p> <p>Other suggestions included:</p> <ul style="list-style-type: none"> • ensuring that equipment used to make ammunition be subject to the same controls • introducing a dealer-to-dealer exemption on recording the sale of ammunition in the registry and allowing normal sales to be kept in the invoice system • ensuring that the only information necessary is that the dealer must ensure that the purchaser is licensed. 	
Key quotes	
<p><i>"A record of ammunition bought in by a LFO is likely to be out of date as soon as it is put in. Ammunition is a consumable; it is bought to be used. This information is particularly irrelevant given the timeframe Police propose to hold this information for – it will increase the amount of inaccurate information in the system and mean Police cannot rely upon it."</i> (Email submitter)</p> <p><i>"Minimisation of required information lessens security risks and reduces administrative burden. Recording the amount and type of ammunition lawfully purchased by a licenced firearm owner is of little relevance given the proposed timeframe police propose to hold such information. Ammunition stocks are generally depleted through use which renders the recording of quantity of little value."</i> (Email submitter)</p>	
Out of Scope	
Submitters said that only citizens will abide by laws and criminals will not.	

Consents to conduct business at a gun show: Questions 49 – 51

Q 49	<p>Do you agree that a dealer who obtains consent under section 7A to conduct business at a gun show must provide the following details to Police for inclusion in the registry?</p> <ol style="list-style-type: none"> name, business address, dealer's licence number address of gun show dates of gun show types and numbers of firearms and ammunition the dealer intends to have at the show how firearms and ammunition will be secured at the gun show in accordance with regulations date of consent
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Reasons for not fully agreeing	
Many submitters said	<p>Many submitters who disagreed or partially agreed with this proposal warned that this requirement would duplicate information that is already recorded, or noted that the infrequent nature of gun shows makes the data pointless.</p> <p>These submitters explained that a firearms licence holder's information is captured at multiple points already, including when registering for a gun show, and whenever ownership is transferred due to the sale of a gun. Submitters considered that existing requirements and consent under Section 7 should be sufficient.</p> <p>Furthermore, submitters highlighted that gun shows are not common in New Zealand and are a short-term event. They expressed concern that the administrative effort would be too onerous and could discourage gun shows from occurring. Submitters also cautioned that this information may be detrimental to public safety as it provides information of what the dealer is carrying to the gun show.</p>
A few submitters said	<p>A few submitters warned that this would be too onerous and could discourage gun shows from occurring.</p>
Alternative suggestions (if applicable)	
<p>A few submitters provided additional ideas or suggestions on the proposal. Most of these submitters suggested keeping information requirements minimal and as simple as possible to ensure compliance. For instance, they suggested that only the identification passport and the necessary legal information that holders need to exhibit to be at the</p>	

show should need to be captured in the registry, while others suggested that only information outlined in points 49 a, b and c (name, business address, dealer's licence, address of gun show and date of gun show) should be required.

The dealers' transfer content should allow the dealer to trade from the alternative location as a dealer. The requirement for such explicit detail is simply regulatory overburdening which unnecessarily wastes police administrative resourcing.

Other suggestions included:

- requiring the dealer to know the serial numbers of all firearms to be taken to the gun show but not report them to the registry unless asked by a Constable
- only introducing a requirement to obtain a permit which outlines security plans for firearms and ammunition at the event, and when and where the event is being held. It was suggested that to do this, Police would need to develop an agreed security requirement template for businesses attending such events to adhere to, with meaningful input from businesses
- retaining existing requirements for gun shows and not introducing any further requirements
- the need to protect the data of licensed firearms holders.

Some key quotes

"By adding this to the registry, it will create "unneeded cost and restrictions to an already struggling industry where most of the above is covered and thought of anyway if not currently in place." (Online submitter)

"The Dealer has to meet certain requirements to bring items to the Show and must, according to the Law, have these items secure at all times. Presumably the Gun Show organisers also have security requirements. The items are on secure display, shown to prospective buyers, and returned to secure display." (Online submitter)

"Dealers are aware of their legislative and regulatory requirements and take all practical steps to ensure they are compliant without the need to supply excessive amounts of unnecessary information. It is also worth noting that dealers stock can change between applying for a dealer transfer and attending a show or event." (Email submitter, Organisation)

"Surely NZ Police will have the data in the registry with respect to anyone who has been granted approval to conduct business at a gun show. It seems extraordinarily inefficient to require capture of yet another set of data when this could be achieved in the initial approval process, assuming the data is required. It is also unclear what the safety benefits to the public would be of keeping data in the registry on a public event that has been approved and data provided for approval. Swiftly becomes a historical data set of very limited use given that sales details of what, when and who is required to be captured." (Email submitter)

The modification of a firearm: Questions 52 – 54

Q 52	<p>Do you agree that a person who modifies a non-prohibited firearm to a prohibited firearm and vice-versa would need to provide the following information to Police?</p> <p>a. a person who modifies a non-prohibited firearm to a prohibited firearm would need to provide the following details to Police for inclusion in the registry:</p> <ul style="list-style-type: none"> i. details of the non-prohibited firearm ii. details of the new prohibited firearm iii. number of the permit to possess the prohibited firearm (this means that a person will need to have an endorsement to possess prohibited firearms – limited to those persons listed in section 4A) which must be granted before the modification is made iv. proof that the firearm has been appropriately modified. <p>b. a person who modifies a firearm from a prohibited firearm to a non-prohibited firearm would need to provide the following details to Police for inclusion in the registry:</p> <ul style="list-style-type: none"> i. details of the prohibited firearm and the permit to possess that prohibited firearm ii. details of the new non-prohibited firearm iii. proof that the firearm has been appropriately modified iv. date of modification.
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Reasons for not fully agreeing	
Many submitters said	<p>Many submitters highlighted compliance as some modification of firearms can result in that firearm being an illegal weapon.</p> <p>They warned that while some people modify firearms for cosmetic reasons or repair some aspects of the item, others may be modifying them to make them an illegal weapon and that these people will not declare it.</p> <p>Declaring the modified firearms to the Police may make law abiding citizens nervous in the event that they unintentionally modified the firearm beyond the boundaries of the law.</p> <p>Submitters said that people modifying firearms to make them illegal will not tell the Police and it may deter licensed firearms holders who legally modify their firearms as they will be nervous that by declaring the modifications they will be risking their licence.</p>
Some submitters said	<p>Some submitters cautioned that using ambiguous terms without clear definitions can lead to subjective interpretations regarding this proposed requirement. For example, submitters noted that the 'level of detail' required is not well defined and suggested that this requirement should be limited to the type, make, model, and ID marking for an item. These submitters also called for greater clarity around the terms 'modification' and 'has been appropriately modified'. They suggested that the word 'prohibited' is replaced with 'restricted'.</p>
Alternative suggestions (if applicable)	
<p>A few submitters provided additional comments or suggestions, with most emphasising that simplicity is key. Submitters highlighted how weapon modification is already covered by the Arms Act (1983) if someone modifies a weapon to be a category they are or are not approved for. Submitters suggested that then a simple description of any modifications made, with supporting photographs, should be all that is necessary to include in the registry.</p> <p>Other suggestions included:</p> <ul style="list-style-type: none"> Any change of classification can be handled under current requirements. Additional regulation should not be required as they are already included on a registry. Keeping the fee required to a reasonable level and ensuring there are no fees for inspection. Requiring item ii to indicate what specific changes have been made to the firearm. 	
Key quotes	
<p><i>"Difficult to agree with a regulation that relates only to the computer record of a particular firearm and is unrelated to vetting. Sorry to be repetitive but I think registration of all arms will be too costly in comparison with what harm it will prevent. There will always be people who still own AR-15s that are unregistered."</i> (Online submitter)</p> <p><i>"Modifying a non-prohibited firearms to a prohibited firearm and visa-versa is current illegal and could only be done by a police registered gunsmith and an endorsed permit."</i> (Online submitter)</p>	

Out of Scope

Many submitters expressed concern that this requirement would not contribute to public safety as it would have no impact on criminals who modify firearms. They noted that criminals will continue to modify firearms to make them illegal, and that is unrealistic to expect that those who illegally modify firearms will declare it to the Police.

Submitters recommended that Police be cautious with their wording in proposals so that it cannot be interpreted that they are saying that firearms owners are problematic.

Submitters outlined that it will be difficult to enforce with 3D printing firearms and firearm components.

PROACTIVE RELEASE

How firearms licence holders will provide details for the registry: Questions 55 – 57

Q 55	Do you agree to the methods for firearm licence holders to provide information to Police for inclusion in the registry would be online through an internet site provided by the Commissioner, or by entering the information in a form prescribed or approved by the Commissioner that can be downloaded from the Police website and also available from Police stations?
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Reasons for not fully agreeing	
Most submitters said	Most submitters that indicated that they disagreed with the proposal said that data security and privacy of the information provided online was a key issue. These submitters said that they did not think that the Police would be able to develop and manage an online system that would be able to safely secure potentially sensitive data that firearm licence holders would upload.
Many submitters said	Many submitters highlighted the risk of data input error from firearms licence holders manually entering their data through the online form. Submitters said that the large amount of information required means that there is increased chance of input error from licence holders, through misunderstanding, lack of knowledge, or human error.
Some submitters said	Some submitters considered that there would be no benefit to public safety with the proposed method of entry. They explained that the method of entry would not do anything to address the firearm-related crimes that currently take place. Some submitters also thought that the proposed online system would be too complicated or hard for people to use. Submitters noted that this would be a key issue for older firearm licence holders who are less confident with technology, as well as individuals who did not have internet access. Submitters said that there should not be barriers for these individuals to provide necessary information.
A few submitters said	A few submitters said that rural firearm licence holders would struggle with a strictly online system.

Alternative suggestions

A few submitters provided additional comments or suggestions relating to this proposal. These included:

- Create an app for the registry that incorporates permits and any other arms transaction to automate the process and remove human error.
- Ensure that hard copy forms are still available from a Police station or through the post.
- Require that any information about firearms that is held by a firearm licence holder needs to be verified by the Vetting Officer when a renewal or change of address is being confirmed, and that this should be completed by a Vetting Officer during a visit to the firearm licence holder's address.
- Impose a statutory time frame on the Police to enter the information into the registry.

Key quote

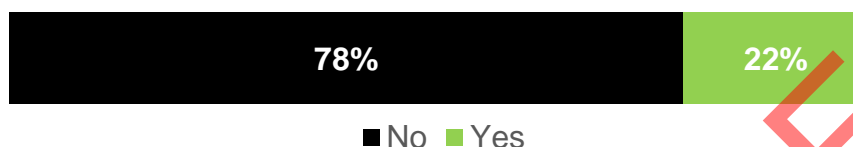
"If I can gain access to the part of the register where my firearms are, then there is potential for unauthorized others to do the same. From there a hacker can gain access to the rest of the registry." (Online submitter)

Out of Scope

Some submitters said that existing firearms laws and procedures are adequate when properly enforced, so the registry is not necessary.

How transfers by dealers and ammunition sellers will be entered into the registry: Questions 58 – 60

Q 58	Do you agree that from 24 June 2023, dealers and ammunition sellers would need to provide details of their transfers online to Police for inclusion in the registry?
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Reasons for not fully agreeing

Most submitters said.	<p>Most submitters who disagreed with this proposal said that the requirement for dealers and ammunition sellers to provide details of their transfers online would not produce any benefits to public safety. These submitters considered that the proposed information would do nothing to reduce gun crime, which they said was the main issue that the Police should be focused on. These submitters also noted dealers can provide transfer information to Police when required, so it was considered unnecessary to require this information for all transactions.</p> <p>Submitters also noted that in their interpretation of the consultation document, there appeared to be a requirement that preceded this proposed change stating that individuals would have to record their own transactions. These submitters highlighted that this requirement would therefore create 'double-handling' of data, where both dealers and individuals are recording either side of the same transaction. These submitters said that there was no benefit to this double up of transaction details.</p>
Many submitters said	<p>Many submitters raised concern that the storage of the proposed information creates an unnecessary data security and privacy risk. They thought that the security of the Police website used by dealers for entering transfer details would not be sufficient or safe. These submitters commented that data privacy is essential when details such as an individual's transaction history are being recorded, and considered that Police could not guarantee the necessary data security.</p> <p>These submitters also generally noted that regardless of the security safeguards and systems that Police could implement, simply storing this information creates the <i>possibility</i> of unauthorised or wrongful access and publication.</p>
Some submitters said	<p>Following on from the issue of data privacy and security, some submitters considered that the online submission of this information is the key issue of this proposal. These submitters said that dealers should instead be able to maintain their own physical records or "books" that are held and stored by</p>

	<p>each individual dealer. Submitters said that it is acceptable that these records can be checked and inspected by Police over time, but it is safest for dealers to maintain possession of these physical records at all other times.</p> <p>Some submitters said that the current verification processes and requirements for firearms licences are adequate and there should not be any changes to data entry or recording processes. Current expectations on dealers for recording information are fair and reasonable, according to these submitters.</p>
A few submitters said	<p>A few submitters said that the private licence information theft from a former Police station in Auckland demonstrated the risk of data loss and Police's failure to keep private data safe.</p> <p>A few submitters said that it is very difficult or 'near impossible' to know how much ammunition is sold due to the nature of ammunition being used quickly and regularly. Due to the difficulty in maintaining these ammunition figures accurately, these submitters did not agree with the proposal.</p>

Alternative suggestions (if applicable)

When providing comments and suggestions related to this proposal, submitters reiterated the recommendation for dealers to be able to retain their pre-existing physical records (“books”) instead of being forced to use the online system that is developed by Police, to quell any data security or privacy concerns.

These submitters said that these records could and should be inspected by the Police in order to ensure that a high standard and accuracy is maintained, but there should not be a requirement for all information to be provided to the Police at the time of information collection.

Key quotes

“They should be responsible for keeping an in house register in house, which most will have if operating computer point of sale equipment.”

“To go to the trouble of updating the Police Registry for every transaction without their system being automatically linked to the police registry, is too time consuming and very soon lead to some being missed potentially, so then the police registry would become inaccurate.”

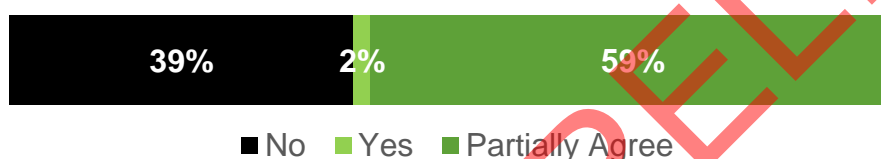
Out of Scope

A few submitters said that a registry is a waste of public money, and this proposal, as part of the registry, is not a good idea.

Submitters also said that criminals should be targeted, rather than licensed firearms users who are buying firearms and ammunition.

Timing: Questions 61 - 63

Q 61	<p>Do you agree that the relevant details of any event needing to be recorded in the registry must be provided to Police within the following timeframes?</p> <p>a. for transfers of arms items the supplier must provide details of supply immediately, during or following a transfer. The receiver must provide details of receipt as soon as practicable but no later than five days after the transfer occurring.</p> <p>b. within five days for an item being manufactured.</p> <p>c. for notifications of import, within five days after the date on which the item is released to the importer by Customs.</p> <p>d. for exporting, within five days after the date on which the item is exported.</p>
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Reasons for not fully agreeing	
Most submitters said	<p>Most submitters who disagreed or partially agreed with this proposal said that the suggested timeframes were too short, and that this would lead to frustration and potential non-compliance. They said that the suggestion of five days is unrealistic as it does not take into account factors such as rural or remote locations, limited internet access, or holiday periods. A few of these submitters suggested that the inclusion of 'working days' in the time period may make the timeframe more realistic.</p> <p>Submitters often compared the timeframe expectations of the Police to current wait times for processing firearms licence applications and renewals. They said that the year-long wait times that applicants currently experience are not consistent with the proposed expectation for details of an event to be provided to Police.</p> <p>Submitters also said that the proposed timeframe expectations do not take into account delays for shopping and processing, especially as seen with Covid-related delays.</p>
Many submitters said	<p>Many submitters said that the requirements of this proposal would be too complicated or difficult to implement, operate, and maintain.</p> <p>These submitters said Police already struggle with maintaining their current operations and processes, and this proposed system would be setting up an overly difficult time-sensitive aspect of the transfer process. Submitters described the potential requirements as 'hugely onerous'.</p>

Some submitters said	<p>Some submitters said that there should be a greater focus on illegal firearms use instead, and that creating administrative burden through time-sensitive processes will prevent Police from doing work that is more important.</p> <p>Submitters also said that the personal information provided within the transfer details could create the potential for the information to be accessed by people with bad intentions. Submitters said they were concerned that this personal information could be used to identify where firearms are moved to and could lead to targeted burglaries or attacks from criminals.</p>
Alternative suggestions (if applicable)	
<p>Submitters suggested a variety of alternative timeframes that would be more realistic and fair for firearm licence holders to provide notification to the Police. Some of these submitters suggested that the time should be changed to five working days, while others suggested that it should be at least 10 working days. Other timeframes included up to 14 days from when the transfer takes place, and some suggested up to 30 days.</p>	
Key quotes	
<p><i>“There should be no registry but there needs to be a process of import/export and it needs to be more efficient than the 20 day turn around for replies that currently exists. You are asking people to respond within 5 days then telling them your response time is 20 days. This cannot possibly work.”</i> (Online submitter)</p> <p><i>“The proposals are excessive and going to drown the Police in a mountain of paper. How is that going to keep criminals with firearms and no licences from creating offences?”</i> (Online submitter)</p>	
Out of Scope	
<p>A few submitters said that this proposal should be scrapped, along with all aspects of the registry.</p>	

Prescribed persons: Questions 64 – 69

Q 64	Do you agree that the definition for a prescribed person would include any person in possession of a firearm who may temporarily be unlicensed while their application for renewal of their licence is being processed?
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Reasons for not fully agreeing	
Most submitters said	Most submitters did not agree that the definition for a prescribed person should include any person in possession of a firearm who may temporarily be unlicensed while their application for renewal of their licence is being processed.
Many submitters said	<p>Many of these submitters said that they were concerned about the Police's capacity and ability to maintain or implement the proposed definition of 'prescribed person'. Submitters considered that the Police are currently too slow to issue renewals for long-term firearm licence holders, and it would not be fair on these licence holders to be 'treated as criminals' as a result of the Police's inability to keep up with renewals.</p> <p>These submitters noted that if the proposed definition of 'prescribed person' was to be implemented, then it is necessary for the Police to invest in further resource to ensure the process does not take an unnecessarily long amount of time.</p>
Some submitters said	Some submitters raised that there are many people who currently fall under the 'prescribed persons' category due to delays in firearms licence renewal. They therefore noted that it will be important to clearly identify and describe the responsibilities and rights of a prescribed person.
A few submitters said	<p>A few submitters said that the proposed definition seemed unnecessarily complicated. They explained that an unlicensed person should be able to hand in a firearm found in a deceased estate to the Police without being a 'prescribed person'.</p> <p>A few submitters did not understand what the question was asking, and subsequently said that they were unable to confidently answer this question</p>

Alternative suggestions (if applicable)

Some submitters who provided additional comments on this proposal said that Police should implement clear and consistent timeframe requirements on their own relicensing processes before assigning this new definition of a prescribed person. These submitters also said that Police should focus on their licencing renewal processes before making any changes to definitions or expectations of those who are taking part in this process.

A few submitters said that a temporary licence would be an effective way of ensuring individuals who are waiting for a licence renewal are not negatively affected by possible delays in Police's processing systems.

Key quotes

The time taken to relicense a licensed person is to 'allow for a seven month renewal process period'. I can sort of understand why, but if it takes this long to renew a license, how are you going to manage this new process on top of that?

Regulations should provide that a person whose licence expires is deemed to be licenced as long as they have applied to Police for a new licence. On application for this (the register or an app could be used) Police should issue a temporary licence card like NZTA do for drivers licencing.

Q 67 Do you agree that the definition for a prescribed person would include a person who is an executor/ administrator of the property of, and a person with power of attorney for, individuals who were or are in possession of firearms?



Reasons for not fully agreeing

Most submitters said Most submitters said that this definition of a prescribed person would be too difficult to understand, implement and maintain. These submitters said that the important thing was the firearms belonging to someone who has passed away need to be handed in to Police. They said that adding a label and a series of requirements for these individuals would make this process unnecessarily difficult and people would hesitate to engage in this important process.

Some submitters said Some submitters said that the requirements are unnecessary and that they should be stripped down to basic, clear requirements. These submitters offered some suggestions as to what requirements are essential and should matter more than the factors listed in the included definition.

A few submitters said	A few submitters said that they did not understand what this question was asking them and could not give an informed answer.
Alternative suggestions (if applicable)	
<p>A few submitters provided suggestions for alternate wording that they said would make more sense and easier to understand. For example, one submitter suggested that “and/or power of attorney” should be included in the definition, as a prescribed person and power of attorney and not necessarily mutually inclusive.</p> <p>A few submitters said that support networks would need to be established to support families of firearms holders to assist them in navigating the required actions relating to the firearms left behind.</p> <p>Some submitters said that the requirements of a prescribed person should be stripped down to a more basic level. Submitters suggested that the requirements should be as basic as owning a suitable gun safe to manage the firearms that have been left in the case of a death.</p>	
Key quotes	
<p><i>“This makes the process unnecessarily complicated – the main point is to have the firearms handed in. Creating a ‘title/label’ for the person only makes people hesitate. If they are not in the firearms community, they will not understand the term ‘prescribed person’ and it may indeed make them less likely to approach Police with what they have found.”</i></p> <p><i>“I’m still confused. You are putting the responsibility to register items onto a person who has no right to be in possession of them.”</i></p>	
Out of Scope	
Some submitters responded to this question and said that the registry should be scrapped altogether.	

Events activating provision of information: Questions 70 -72

- Q 70** Do you agree that each of the following circumstances will require firearm licence holders to provide information on all prescribed items they possess in the following circumstances?
- a. application for a licence or endorsement, or the issuing of a licence upon determination of an application
 - b. notifying any change of address, the occurrence of any of the circumstances described in section 24A(1), or a change in medical practitioner
 - c. the sale, hire, loan or other supply of an arms item to either a licence holder or non-licence holder under immediate supervision (other than a temporary transfer)
 - d. the purchase or receipt of an arms item (other than a temporary transfer)
 - e. the importation of an arms item or ammunition
 - f. the export of an arms item
 - g. the manufacture of an arms item
 - h. the purchase of ammunition
 - i. the theft, loss or destruction of an arms item
 - j. the surrender or expiry of a licence
 - k. the licence holder being subject to any compliance or enforcement action under the Act, including warnings, improvement notices, temporary suspensions of licence and criminal changes under the Act.



Reasons for not fully agreeing	
Most submitters said	<p>Most submitters who did not fully agree with the proposal stated that there were too many specified circumstances or trigger points captured within this requirement, and that it would not be plausible for licensed firearm holders to comply.</p> <p>These submitters also pointed to a range of reasons why the proposed requirement would be too onerous on firearm licence holders, including:</p> <ul style="list-style-type: none"> Many of these submitters said that because a loan is temporary, it would not make sense to provide this information every time. These submitters said that accuracy would be compromised as a result of the nature of trying to capture nuanced or rapidly changing ideas like this. Many submitters said that to provide information on all of their prescribed items would be unrealistic. They often noted that ammunition would be too difficult to record and that making this a requirement would not create a better picture of the ammunition that firearm licence holders currently hold.
Many submitters said	<p>Some submitters did not agree that medical practitioners should be involved in most of the specified instances listed. Many of these submitters considered that the information requested by the Police is an invasion of privacy and that the Police holding both medical and firearm information is excessive.</p>
A few submitters said	<p>A few submitters said that they did not fully agree with the proposal because the suggested requirements were too onerous but did agree with broader information being captured. Licensed firearm owners should only have to either confirm that nothing about their prescribed items has changed or note any changes that have occurred.</p> <p>A few submitters considered that the required information would not contribute to improved public safety because the administrative burden meant that the Police energy was focused on maintaining the database rather than addressing existing firearm-related crime.</p>

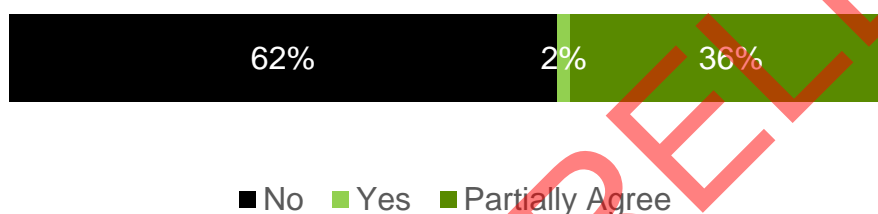
Alternative suggestions (if applicable)
<p>A few submitters provided additional comments or suggestions relating to this proposal. These suggestions included:</p> <ul style="list-style-type: none"> Define 'loan' as a period of less than 12 months. Introduce a longer timeframe for information to be provided relating to the theft, loss or destruction of an arms item.
Key quotes
<p><i>"Leave out the medical practitioner."</i></p> <p><i>"Plainly, triggering provision of information when supervising a non-licence holder is going to be problematic with regard to volume of data."</i></p> <p><i>"The system/police won't be capable of handling the volume."</i></p>

“Based on the disclosure of firearm licence information including firearms licence names and addresses from the former Auckland Central Police Station in May 2022. I have no confidence that a new firearms registry would not suffer a similar disclosure of information which may fall into criminal possession.”

PROACTIVE RELEASE

Items to be recorded: Questions 73 -75

- Q 73 Do you agree that when a specified circumstance takes place (clause 14), the licence holder must provide information on the following list of specified items:
- Firearms (other than antique firearms)
 - Prohibited magazines
 - Major firearm parts [the action (frame, receiver, or upper and lower receiver) of a firearm, the frame of a pistol, and a calibre conversion component or kit of a pistol]
 - Restricted airguns
 - Restricted weapons
 - Pistol carbine conversion kits.



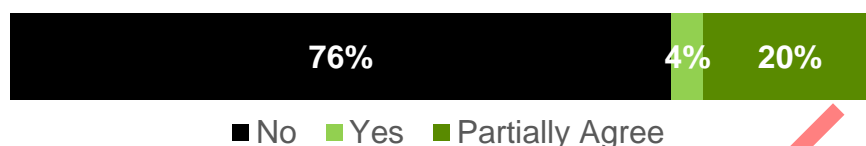
Reasons for not fully agreeing

Most submitters said	Most submitters who disagreed or partially agreed with the proposal critiqued that the inclusion of all major parts listed was unrealistic and unnecessarily complicated. They critiqued that a licensed firearms holder may not be able to label all parts with complete professional accuracy and difficulties may present as many of the parts listed do not have any markings.
Many submitters said	Many submitters were concerned that the amount of detail required in this proposal would not benefit public safety, but rather would lead to data entry errors and duplication of information. They also raised that the Police already record the details of prohibited and restricted items and further information should not be required.
Some submitters said	Some submitters pointed to a lack of definitions for key terms, and called for greater clarity on the following terms: <ul style="list-style-type: none"> ‘major parts’ ‘restricted airguns’ ‘specially dangerous airguns’ ‘specific circumstance’ ‘Pistol carbine kits’.

A few submitters said	<p>A few submitters disagreed with the requirement to provide details on pistol carbine conversion kits. They explained that these kits are not firearms and some do not have serial numbers, therefore should not be captured in the registry.</p> <p>A few submitters also stated that antique firearms should be excluded from the registry.</p>
Alternative suggestions (if applicable)	
<p>Of the few submitters that raised additional suggestions about the proposal, most submitters recommended that since no timeframe has been specified for these requirements, then the full five-year timeline set out by Parliament should be adhered to. Additionally, many submitters outlined that the registry should be limited to complete firearms only.</p>	
Other suggestions included the following:	
<ul style="list-style-type: none"> • provide clarity on what 'Clause 14' in this proposal is referring to. For instance, specify that it refers to Clause 14 of the Arms Act (1983). • exclude restricted airguns intended for an Airsoft game from needing to be registered • broaden the firearms category to include antique firearms • exclude airsoft and paintball guns from the requirements. 	
Key quotes	
<p><i>"Again, the level of detail required goes beyond what the Law requires. The interpretation of this extra data will not be consistent, hard to record and maintain with any accuracy ongoing, leading to massive time and resources costs, without any safety benefit to the community."</i> (Online submitter)</p>	
<p><i>"The requirement for the registration of Major Firearm Parts overcomplicates the system and increase the chances of inaccuracies. It should be limited to complete firearms as it is only in the complete form that they are useable."</i> (Online submitter)</p>	
Out of Scope	
<ul style="list-style-type: none"> • Some submitters were concerned with how the Police propose to deal with keeping firearm licence holder's information safe from hackers as well as ensure that Police are mindful of and do not breach the Privacy Act 2020. • Registry of class guns should not be mandatory. 	

Particulars to be recorded: Questions 76 -78

Q 76	Do you agree that when the licence holder is involved in any of the circumstances in the previous question, they will need to provide specified information to the Police for inclusion in the registry on each of the items possessed by them at the time, unless this information has already been provided?
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Reasons for not fully agreeing	
Many submitters said	<p>Many submitters who disagreed or only partially agreed with this proposal raised concerns with the privacy and security of the information to be held within the registry. These submitters struggled to see how providing the proposed information would contribute to improved public safety.</p> <p>Some of these submitters expressed concern around security of information, and particularly disagreed with the requirement to provide the location of where firearms are stored. These submitters stated that the storage location is already linked to the Police NIA information captured for a firearms licence and can be found there. It was also noted by a few submitters that firearm storage location should not be directly recorded in the registry as it is not exclusive to the Police.</p>
Some submitters said	<p>Some submitters raised concern that the level of detail required in this proposal goes beyond what legislation requires. These submitters suggested that the type, make/model, calibre, and serial number is sufficient for firearm identification. A few of these submitters indicated that they already have a legal duty to report theft, loss or destruction and this would be a double handing of that information.</p>
Alternative suggestions (if applicable)	
<p>A few submitters suggested making it the responsibility of the firearm licence holder to keep a record of what firearms they hold, and if they sell or dispose of these firearms then a record of sale/disposal must be made. They suggested that this approach would need to carry severe penalties for breaches. Submitters considered that that this suggestion could help prevent any data breaches and leaking of personal information.</p>	

Key quotes

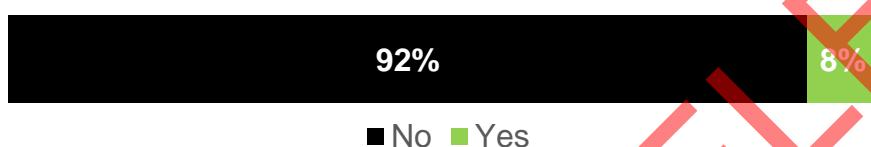
- *This information is too dangerous to provide – it will have real world consequences for law abiding citizens. No system is good enough to secure this information – the risk is too big.* (Online submitter)
- *LFOs already have a responsibility to report on the transactions and events, this burden of additional reporting adds nothing to the aim of safety and significantly increases the burden on the LFO for no reason.* (Online submitter)
- *Storing this information creates the possibility for it to be wrongfully published or accessed by unauthorised people, as has happened in the past.* (Online submitter)
- *Based on the disclosure of firearm licence information including firearms licence names and addresses from the former Auckland Central Police Station in May 2022. I have no confidence that a new firearms registry would not suffer a similar disclosure of information which may fall into criminal possession.* (Online submitter)

Out of Scope

Some submitters who provided comment on this question raised concern with or opposed the implementation of a registry in its entirety. They generally did not support other agencies having access to the database as there is too much risk to licence holders and it has been suggested that this information can easily be passed on to criminals.

Time after a relevant event in which to provide information: Questions 79 – 81

Q 79	<p>Do you agree that the details of specified arms items possessed by the licence holder must be provided to Police within 14 days of occurrences set out in Question 70 taking place.</p> <p>This means that following the date of a transaction such as the transfer of a firearm taking place (which will be either recorded live in the registry or recorded in hard copy at the time and sent to Police for inclusion in the registry) there is a further 14 days in which the licence holder must enter the arms items they already possess – over and above the items in the transaction – into the registry).</p>
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Reasons for not fully agreeing

Most submitters said	<p>Most submitters who disagreed with the proposal said that the 14-day time limit was too short. These submitters often referred to possible scenarios or reasons that could delay this data entry or otherwise make the 14-day timeframe difficult to comply with. These scenarios included:</p> <ul style="list-style-type: none"> • having no or limited access to internet • living far from the local police station • public holidays • attending to household needs • employment responsibilities • owning a large collection of firearms • a slow postal service. <p>Some of these submitters commented that the proposed timeframe is inconsistent with existing Police regulations for some of the listed triggering events (such as change of address) and should be changed to match the existing 30-day timeframe.</p>
Some submitters said	<p>Some submitters expressed their concern with the re-entry of data, the possible input errors that could occur, and the penalties associated with these errors. They said that the process is too complicated and needs to be simplified to meet any timeframe to ensure that licence holders are not unfairly penalised.</p>

Alternative suggestions (if applicable)

Some submitters provided additional suggestions for this proposal. Generally, these submitters recommended that the timeframe should be extended. Submitters' views varied regarding the suggested timeframes, with the range being between 30 days – 5 years. However, submitters most commonly suggested that the timeframe should be 30 days from the triggering event.

Key quotes

"The timeframe is outside the realms of reality. People have lives to live, family to feed, work to be done. To make outlandish demand like these sets people up to fail." (Online Submitter)

"To re-enter already existing data invites error, causes frustration by the owner, loss of time, and increased level of distrust of the NZ Police in unnecessary bureaucratic process." (Online Submitter)

Out of Scope

Data security was mentioned by some submitters but is out of scope for this question (given it is about a timeframe).

Final date for the provision of information by licence holders on all specified arms items they possess: Questions 82 – 84

Q 82	Do you agree that if a firearms licence holder possesses specified arms items on 25 June 2028 that have yet to be recorded in the registry, they will have until 30 August 2028 to provide Police with particulars on those items for inclusion in the registry?
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Reasons for not fully agreeing	
Many submitters said	Many of the submitters that disagreed with the proposal said it was redundant to give a grace period. They said the final date should be set and police should do everything in their power to make sure all New Zealand firearm holders are aware of it.
Some submitters said	Some submitters said that the 5-year time frame was too long and should be implemented sooner. Some other submitters said that the timeframe was too soon and did not provide enough time to have all their items fully registered.
Alternative suggestions (if applicable)	
A few submitters offered other ideas or suggestions relating to this proposal. These suggestions included:	
<ul style="list-style-type: none"> providing a provision for a firearms licence holder to apply for a time extension contacting licence holders when six months is left until the final date and the beginning of the grace period. 	
Key quotes	
<p><i>The date is the date - why the extension? Police need to have their marketing comms running at 110%. (Online Submitter)</i></p> <p><i>Why not just set the final date? seems redundant. (Online Submitter)</i></p>	

Shooting Clubs: Questions 85 – 87

Q 85 Do you agree to regulations providing that information required under the Act or Regulations to be provided to Police by or on behalf of shooting clubs or by individuals participating in shooting club activities may instead be entered online into the registry when the Commissioner allows it?

The information could include:

- a. details of the club, its operation and activities
- b. membership
- c. participation in the shooting activities of a pistol shooting club
- d. records related to the sale or supply of ammunition or firearms to club members or on club premises, where the revenue is for the benefit of the club.



Reasons for not fully agreeing

Many submitters said	<p>Most submitters who indicated they disagreed with the proposal shared concerns about the registry being too complicated and lacking any tangible public benefit.</p> <p>These submitters expressed concern that the proposal asked for too much detailed information which would be hard to maintain and cause an excessive workload for clubs, who are largely run by volunteers.</p> <p>These submitters also raised concerns the increased administration does not increase public safety, with some commenting there would be no benefit to safety and suggested that conversely, clubs and volunteers would be put at risk due to unnecessary regulatory burden and poor data security.</p>
Some submitters said	<p>Some submitters stated that sufficient information was already gathered by clubs via other regulations, and that there was no need to duplicate the data in an online registry. These submitters opposed detailed information being collected and suggested it could create a 'shopping list' for criminal activity.</p>
A few submitters said	<p>A few submitters expressed concern that the registry was originally proposed to track firearms throughout a lifecycle and commented that the extent of the proposed information to be gathered sits outside the intent of the registry and provides no benefit to public safety.</p>

Alternative suggestions (if applicable)

A few submitters suggested that the registry should record the make, model, and serial number only, and that this should be recorded at the border at the time of importation. They considered that those three details capture the necessary information to give Police a picture of what is 'circulating' in the country over time and there is no need to record any further detail.

Other suggestions included:

- introducing a simple system for clubs to report incorrect behaviour in place of a registry.
- allowing clubs to access the registry and indicate which members are current licence holders.

Key quotes

"The regulatory burden on ranges is unwarranted and does nothing for the interests of public safety". (Online submitter)

"Official shooting ranges are already suitably administered. Groups that operate on an improvised or ad-hoc basis should not be subject to additional administrative load as they are already small and additional load would be overly burdensome." (Online submitter)

"Operation of the range and Shooting Activities change frequently throughout the year, this would be particularly onerous on volunteers with increased complexity for clubs and the registry, for little benefit." – Email submitter

"information gathered should be relevant, just about the club not its members, segregate the data so that if this information is lost then the impact is lessened." (Online submitter)

Out of Scope

Many submitters suggested that shooting ranges provide a valuable, safe facility for both firearm owners and the general public as it enables licensed firearm owners to safely shoot their firearms in a safe environment away from the wider community. These submitters raised concerns that the registry was putting the life of the ranges in question by being burdened with unnecessary paperwork.

Shooting ranges: Questions 88 – 90

Q 88 Do you agree that information required under the Act or Regulations to be provided to Police by or on behalf of shooting range operators may instead be entered online into the registry when the Commissioner allows it?

This information could include details of the range, its operation and shooting activities conducted on it.



■ No ■ Yes

Reasons for not fully agreeing

Many submitters said

Many submitters who disagreed with this proposal suggested the information required to be entered online would result in excessive paperwork and administration for the clubs, potentially leading to the demise of clubs.

These submitters expressed concerns that the amount of information requested risked being too complex, hard to administer, and comply with. These submitters suggested the operation of activities at ranges changes frequently throughout the year and stressed this it would become onerous on volunteers to keep up the registry.

They also commented that the increased workload on volunteers from this requirement would add little to no benefit to the public or lead to improvements in public safety. They commented that increased unnecessary administration and financial costs to clubs, who rely on volunteers, means clubs may be forced to close under these pressures.

Some submitters stated that this is excessive record keeping at an increased cost with no benefit.

Some submitters said

Some submitters suggested that range operators should be able to provide the required information in whichever format best suits the range operator, such as online or via other means. These submitters expressed concerns that many of the club operators are volunteers, and therefore clubs should have the flexibility to use a format which suits them best.

A few submitters said

A few submitters suggested no personal details should be captured, as this poses significant risk if the database is breached. These submitters commented that firearm licence holders are already approved to undertake activities and recording further information as proposed puts the security of those individuals' information at risk.

A few submitters considered that the increased regulations proposed are creating a problem where one does not already exist. They suggested that over-regulation of clubs will lead to a decrease in public safety, as firearm licence holders will go back to shooting at unregulated, unsafe places, contrary to the aim of the proposal.

A few submitters suggested that due to the requirement for ammunition to only be sold to those legally entitled to possess it, there is no need for clubs to record the sale of ammunition.

Alternative suggestions (if applicable)

It was suggested that third parties such as range operators or clubs be exempt from providing information to the Police.

Key quote

“Operation of the range and Shooting Activities change frequently throughout the year, this would be particularly onerous on volunteers with increased complexity for clubs and the registry, for little benefit.” (Email submitter)

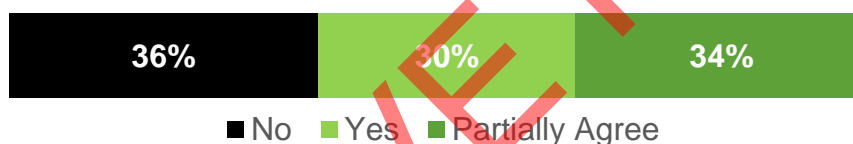
Out of Scope

The wording in the proposal such as “Could include” and “other times” is too vague and leaves too much room for over-zealous or action.

PROACTIVE RELEASE

Executors/administrators of deceased persons and power of attorney: Questions 91 – 93

Q 91	<p>Do you agree that specified information should be provided to Police for inclusion in the registry by:</p> <ol style="list-style-type: none"> any executor/administrator of the property of a deceased person who was in possession of firearms any person who has power of attorney for a person who is in possession of firearms? <p>And do you agree that this information would need to include the following?</p> <ol style="list-style-type: none"> a photocopy or electronically scanned copy or photograph of the death certificate and name and bona fides of administrator, or name of person who is subject to power of attorney and name and bona fides of person with power of attorney a photograph of the firearm any identification marking (e.g. serial number) any transfer of that firearm to a licensed dealer or firearms licence holder.
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Reasons for not fully agreeing	
Many submitters said	<p>Many submitters who indicated they disagreed or only partially agreed raised concerns about the level of information required once a firearms licence holder is deceased, and the burden this will place on grieving families.</p> <p>Particularly, these submitters shared concerns that the excessive information required was overly burdensome and recommended that the process should be made as simple as possible, provided the name of the deceased and the executor are provided. They suggested the main concern should be the safe and secure storage of firearms and ammunition of the deceased and recommended this process could be facilitated by the district arms officer.</p> <p>Some of these submitters noted that the expectation for an executor or holder of the power of attorney to have knowledge of, and navigate, these requirements was unrealistic and burdensome during a time of grief. They stated that to fulfil obligations, executors should only be required to report an individual's death to the Police if the deceased is a firearms licence holder. These submitters expressed concerns that executors may have no knowledge to comply with the regulations, and nor should they need to.</p>

Some submitters said	<p>Some submitters considered that the requirement to produce photographs of the firearms and a death certificate for the deceased is unnecessary. They commented that all information regarding the firearm should already be in the registry, therefore all that should be required upon the death of a firearms licence holder is the serial number of the firearm, or at most a description of the make, model, and calibre of the firearm.</p> <p>These submitters commented that the system should be capable of recognising the transfer of firearms without placing unnecessary burden on the executor of having to inform Police of a person's death. These submitters suggested arms officers and vetting officers should discuss contingency plans with licensees and encourage them to nominate a person to handle the transfer of firearms should the need arise.</p>
A few submitters said	A few submitters suggested the process of handling firearms of the deceased should be made as simple as possible, with the primary concern being the secure storage of the firearms and ammunition of the deceased.
Alternative suggestions (if applicable)	
<p>A few submitters provided additional comments or suggestions relating to this proposal.</p> <p>Some of these submitters suggested that executors, administrators, and people with powers of attorney to act should be trusted to act appropriately and in accordance with the wishes of the deceased and the Arms Act.</p> <p>Other suggestions included allowing executors to enter the licence number of the person now responsible for the firearms and allow temporary possession to be transferred from the executors.</p>	
Key quotes	
<p><i>"There may be many instances of executor/administrators or persons with power of attorney who have no knowledge of firearms. In such instances they should be able to simply report the person's death to Police and the fact the deceased was a LFO to fulfill (sic) this obligation."</i> (Online submitter)</p> <p><i>"Arms officers and vetting officers should approach the subject of contingency plans in the event of unfortunate circumstances. Through these people, licence holders should be encouraged to make provision for a nominated person or persons to deal with their firearms should the need arise."</i> (Online submitter)</p>	

Accessing information in the registry: Questions 94 – 96

- Q 94 Do you agree that the Commissioner must ensure the registry or any part of the registry is only accessed by the following persons or class of persons?
- licence holders to access and verify their own information, seek correction if they find it to be inaccurate and advise any updates. This includes personal information they submitted with their application and the list of their firearms
 - firearms licence holders to indirectly verify (through an online tool) the firearms licence status of a person to whom they are selling or supplying or from whom they are acquiring arms items or ammunition
 - firearms licence holders selling a pistol, restricted weapon, prohibited firearms or prohibited magazine to indirectly verify the purchaser's endorsement and permit to possess
 - dealer's licence holders to indirectly verify the firearms licence status of a person to whom they are selling or from whom they are acquiring arms items or ammunition, and the person's endorsement status and the number of their permit to possess if that person is acquiring from the dealer a pistol, restricted weapon, prohibited firearms or prohibited magazine
 - licence holders selling through mail order or internet site non-prohibited firearms or non-prohibited magazines to indirectly verify the purchaser's authorisation to take possession
 - shooting clubs to indirectly verify the firearms licence status of a person who is seeking to become, or who is, a member of the club
 - shooting range operators to indirectly verify the firearms licence status of range users
 - members of Police to obtain the details of firearm holdings of licence holders and details of their addresses and contact details for the purposes of detecting, investigating or prosecuting offences.
- The information that could be accessed by persons described in (b), (d), (e), (f) with regard to the other persons' firearm licence would be:
- no licence
 - current licence
 - licence expired
 - current endorsement status
 - no endorsement
 - number of current permit to possess
 - no permit to possess.

38%

15%

47%

■ No ■ Yes ■ Partially Agree

Reasons for not fully agreeing

Many submitters said	<p>Many submitters who disagreed or only partially agreed expressed concern over the access to the data that is proposed to be held within the registry.</p> <p>Specifically, these submitters were apprehensive over the security of the data, suggesting that the risk of improper use of the registry increases as the number of people allowed access increases.</p> <p>These submitters expressed a lack of confidence in the Police's ability to keep the information within the registry safe and secure. They stated that the risk of misuse is too high, and the information could easily fall into the wrong hands, creating the risk of the information being used for criminal intent. These submitters noted information has been exploited in the past and lacked confidence that this would not occur again.</p> <p>Most of these submitters suggested the need to heavily restrict access to the registry to persons who have powers under the Act, such as the Police. They stated there is no need for clubs or range officers to access the registry to verify a licence, as firearms licences are accepted as a primary source of identification in New Zealand. Submitters reasoned that where a physical licence can be sighted, this should be relied upon and there should be no need to access the registry to verify the licence status.</p>
Some submitters said	<p>Some submitters expressed concern that the open access to the registry would create a 'shopping list' of firearm locations for gangs and other criminal activity. They stated that safeguards need to be in place to ensure individual firearm owners cannot look up other individuals or locate where they store their firearms.</p>
A few submitters said	<p>A few submitters called for multiple levels of authorisation required to access the registry. These submitters suggested there should be a mandatory process to be followed before anyone is granted access to any data held within the registry. These submitters also recommended the need to have a secure and accurate trail of all access to this information. They suggested a record be kept of who accessed the registry and when it was accessed in case of a privacy breach. A few submitters stated this requirement is too overwhelming and puts the onus on the firearms owner. They suggested the level of bureaucracy was too complex and difficult to administer and suggested it should be left to the Police to input information.</p>
Alternative suggestions (if applicable)	
<p>Other suggestions included:</p> <ul style="list-style-type: none"> A few submitters recommended a tiered approach to access of information. For example, they suggested police officers should be able to access general information regarding whether someone holds a licence, however for more specific data requests, a Police Event Number or Warrant issued for each enquiry stating the grounds for having to exert these powers under s18(2) of the Search and Surveillance Act 2012. A few submitters recommended in the case of a privacy breach, the public should be notified, and a full independent investigation take place. 	

Key quotes

The risk of improper use of the registry increases as the number of people allowed access increases. Access to the firearms registry should be extremely tightly controlled to ensure access is for a legal purpose and is specific to the intent. (Email submitter)

Even though our Police are generally not corrupt, we must accept that it is possible for a criminal element to bribe an officer. This would provide a "shopping list" of locations where weapons can be obtained. It seems to me that this kind of access should only be available to more senior officers, and there MUST be a secure audit trail of ALL access to this information. Who accessed it and when. (Online submitter)

Out of Scope

The database of Firearms Licence holders should have sufficient information and no further information or data needs to be collected and stored.

PROACTIVE RELEASE

Duration of records in the registry: Questions 97 – 99

Q 97 Do you agree that regulations require the registry to hold records relating to firearms licence holders for the lifetime of those licence holders plus 5 years?



Reasons for not fully agreeing

Many submitters said	<p>Many submitters who disagreed with this proposal raised concerns surrounding the breach of privacy of holding information for 5 years after a firearms owner's death.</p> <p>These submitters suggested this proposal was unwarranted, required unnecessarily holding on to redundant data, and was contrary to the Privacy Act. They explained that Privacy Principal 8 holds that personal information must not be kept for longer than is required for the purposes for which the information may be lawfully obtained. Submitters expressed concern that holding information in the registry for the lifetime of firearm licence holders plus 5 years would not adhere to this principle.</p> <p>Many of these submitters also noted that when a person passes away, firearms are sold or transferred to another firearm licence holder, who will subsequently register them. They stated that due to this process, there is no benefit of holding out of date information that will just become 'unnecessary clutter'. These submitters also suggested that the withholding of historic data is irrelevant to public safety and serves no purpose.</p>
Some submitters said	<p>Some submitters suggested that all data should be destroyed upon a firearm licence holder's death or the termination of their licence. They considered that in these circumstances, there is no legal requirement for this data to be kept and expressed concern that retention of this data could pose a security risk to family members of the deceased.</p>
A few submitters said	<p>A few submitters expressed concern at the waste of time and resources required to hold historic data. These submitters commented that retaining historic data provides no benefit to public safety, however the cost of storing this data could be substantial.</p>

Alternative suggestions (if applicable)

- A few submitters recommended reducing the grace period to a maximum of two years post licence expiry or death. They also suggested that the Police or licence holder should have the ability to request this be extended for another year if circumstances require it.
- A few submitters suggested that information should be amended at the point of a licence being revoked or surrendered to reflect the current situation of the firearms. This could include whether the firearms have been transferred to another licence holder or have been sold or destroyed.

Key quotes

Information Privacy Principle 8 holds that personal information must not be kept for longer than is required for the purposes for which the information may be lawfully obtained. Holding this information for the lifetime of licence holders plus 5 years would not adhere to this principle. (Email submitter)

Out of Scope

It has not been specified how this registry and its database will be protected by encryption away from those they know how to access these current data bases.

PROACTIVE RELEASE

Application of regulations to the Department of Conservation: Questions 100 -102

Q 100	Do you agree that the regulations setting out the requirements to provide information to Police for inclusion in the registry as set out in the above proposals should apply to relevant arms items that are owned by the Department of Conservation?
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Reasons for not fully agreeing

[Disclaimer: Many of the submitters who stated they disagreed with the proposal that the registry requirements should apply to the Department of Conservation provided reasons that suggest that they had misinterpreted the question and did agree that Department of Conservation arms should be recorded in the registry.]:

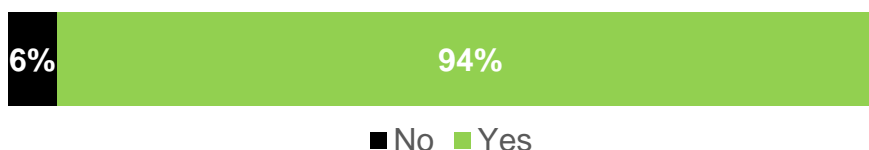
Many submitters said	Many suggested that the law should be the same for everyone. These submitters explained that the Department of Conservation (DOC) should be treated the same as all firearm licence holders, and proposed that if registration is in place, it needs to be the same for everyone, including the military, DOC, and any other Crown entity. These submitters questioned why DOC should be separated and supported to 'operate outside the law'.
Some submitters said	Some submitters suggested that as DOC is a government department, any and all firearms within the department should be administered to the same standard as the Police and stressed the importance of consistency in the regulations.
A few submitters said	A few submitters suggested there is a need to define a 'firearms possessor', and stated they expect this to be an individual person, and not extend to include a government department. A few submitters expressed concern over who in DOC would be authorised to access the registry. They queried whether the authorised people within DOC would be restricted to only access records related to the DOC or whether they would have access to the full database. These submitters shared concerns over privacy of information if DOC was to have access to the entire database. A few submitters suggested that DOC should be trusted to act appropriately and in accordance with the law. A few submitters suggested that any approved DOC worker operating a firearm should be vetted the same as any other individual.

Key quotes

"I disagree with the whole premise of registry - It has no tangible benefit in non-dictatorial society and it's just unnecessary paperwork that will cause errors, corruption and drain resources and in every instance this tool was severely abused." (Online submitter)

Privacy of information in the registry: Question 103

Q 103 Do you think there are any particular privacy issues with any of the proposals?



Reasons for agreeing that there are privacy issues with any of the proposals

Most submitters said	<p>Most submitters who agreed that there are privacy issues with the proposals reiterated concerns raised in answers to earlier questions (relating to privacy and data security).</p> <p>These submitters generally considered that no database or system is entirely safe from cyber-attacks or data leakages and were concerned that having their personal information linked to firearms items all in one place would be desirable for criminals and subsequently put the safety of firearms licence holders at risk.</p> <p>A few of these submitters were particularly hesitant around the Police's ability to keep data safe and secure, often pointing to previous examples where data held by the Police has been hacked or breached.</p> <p>A few other submitters noted concern with multiple agencies having access to data in the registry. They considered that the more people or agencies who have access to the registry, the less secure the registry will be.</p>
A few submitters said	<p>A few submitters commented that the information being requested as part of the registry goes beyond what is required in legislation (particularly, the principles of the Privacy Act 2020). These submitters tended to not elaborate further on what information was considered unnecessary. They generally considered that the registry seeks information without evidence that the requested information would contribute to public safety.</p>

Suggested mitigations

- A few submitters provided additional comments or ideas around mitigating privacy and data security concerns of the proposals. These suggestions included:
- Ensure that the personal information of a firearm licence holder (such as names and addresses) is separated from firearms details (type, number, storage location etc). Submitters suggested that this information should only be linked by a unique identifier.
 - Limit access to the registry and the amount of information captured in the registry to a minimum. Submitters suggested that doing so would help minimise any negative impact should a data breach occur.
 - Require that a record is kept of any Police staff member or other individual who accesses the registry. Submitters suggested that this record could capture a staff user ID, role or position, and any searches that are entered.

Key quotes

I cannot bring myself to trust that a registry will be secure in any way shape or form. Any information held will be subject to any number of online cyber attacks. There is a proven track record of lack of security into any online information storage registry. (Online submitter)

Privacy is one of my major concerns about the Registry. If my information is not kept safe and in the right hands, my family and I could be put at risk by criminals looking to steal firearms. This would be the exact opposite effect of the Registry being aimed at increasing public safety (Online submitter)

Given past government losses of data and police loss of firearms I am concerned that there is not the cybersecurity in place, nor will it ever be 100%. (Online submitter)

Yes there are huge privacy issues. This potentially gives criminals names addresses and firearms in possession of licensed individuals. As has been proven this information is not safe in the hands of the NZ police. (Online submitter)

Out of Scope

Privacy and data security concerns could be mitigated by not implementing the registry

Final Comments: Question 104

To conclude the consultation document, submitters were invited to provide any final comments, ideas, or suggestions.

Some submitters said Some submitters reiterated their privacy and data security concerns associated with the implementation of the registry. This included concern that the registry would be a target for criminals, and that an inevitable breach of the register would jeopardise the safety of firearms licence holders and their families. Submitters indicated a lack of trust that the Police would have the means to keep data safe and secure, and suggested ensuring that information captured within the registry is kept to a minimum.

A few submitters said A few submitters were generally concerned that the firearms register and regulations would be used to restrict and penalise law-abiding citizens from having access to firearms or participating in their chosen firearm-based sport. They expressed frustration with the complexity and extent of the regulations and suggested that the focus on regulating those who 'already follow the rules' would not contribute to increased public safety. These submitters also cautioned against directing resources into the management of the registry at the expense of targeting illegal use and possession of firearms.

A few submitters provided final comments in support of the registry. They considered that the recording of firearms in New Zealand is a generally good idea and may help to address firearm-related crime. While generally supportive, some submitters said that the register would need to be simple and easy to comply with, well administered and resourced, and recommended that the Police work closely with the firearm community to gain trust and communicate the intent of the registry.

A few submitters expressed frustration with the consultation process and the length and complexity of the proposals and consultation document. These submitters viewed the consultation document / submission form as 'cumbersome' and 'long-winded'.

Other final comments and suggestions included:

- implement a staged introduction or trial period of the registry
- exempt air soft guns and paintball guns from the category of 'restricted airguns'
- ensure the registry is overseen by an independent organisation and not Police

Key quotes

"The firearms community are tiring of the constant persecution being levied against them, We are fit and proper persons of good standing within the community yet we are constantly harassed with new regulation and registration which serves little purpose. Regulators need to build positive relationships with the regulated, we need to have respect and recognition for who we are, not be persecuted relentlessly because of the actions of a lone perpetrator. Police and parliamentarians have a lot of work to do to rebuild the trust and respect of the firearms community and legislation and regulation is only effective if compliance is by consent. Work with us, not against us, let us be part of the solution, not part of the problem." (Email submitter, Organisation)

	<p><i>"In general I support most of the proposals outlined, however I think the requirements and changes need to be made as simple as possible for people to understand so they can't be misunderstood or subject to misinformation about their purpose and people will support them if they are easy to understand and fair and reasonable. Most firearm owners in NZ over the past few years do feel unfairly scapegoated for the actions of gangs and criminals by politicians and non-firearm's owning general public who are largely ignorant about firearms fullstop so anything the Police can do to work with licensed firearms owners and make the system as simple as possible will go a long way towards getting goodwill and buy in from the legal firearm owners in NZ."</i> (Online submitter)</p> <p><i>"Overall I strongly support these changes, they can't come soon enough! I hope that good extra resourcing through a budget bid or similar, is planned so that the Police can implement a strong system and not have it running on a shoestring as the latter is likely to cause frustration amongst some, particularly the ones who will be resistant to the changes in the first place."</i> (Online submitter)</p>
Out of scope	<p>Many submitters who provided final comments reiterated their opposition of the registry in its entirety. These submitters generally considered that a registry would not contribute to increased public safety, but rather would result in a significant cost to taxpayers and a risk to the privacy and safety of firearm licence holders.</p> <p>These submitters also often referred to overseas examples of where the implementation of a firearms register had failed, such as in Canada.</p>



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