

INFORMATION REQUEST	
Regulations for shooting clubs and ranges: key changes to final policy proposals	
Deadline: 29 July 2022	Date: 29 July 2022

Purpose

1. This paper provides you with a summary of the key changes in proposals for regulating shooting clubs and shooting ranges, for your discussion with Caucus.

Recommendations

- a) **note** the attached paper providing information on final proposals for regulating shooting clubs and shooting ranges, to support your engagement with Caucus.

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Regulations for firearms: clubs and ranges: final proposals

Police has consulted on proposed regulations for shooting clubs and ranges

Amendments to the Arms Act that came into force on 24 June 2022 require shooting clubs to be approved and shooting ranges certified by the Commissioner of Police. Regulations are needed to implement those amendments.

From March to May 2022 Police consulted on proposals for regulations through a public discussion document and workshops with stakeholder groups, including my Arm's Advisory Group.

Final proposals have now been developed

Police has taken a risk-based and proportionate regulatory approach in analysing stakeholder feedback and re-assessing the proposals against the need for a clear safety outcome. Careful consideration has been given to the regulatory burden on clubs and range operators, and some requirements are no longer proposed.

Some revised proposals are less burdensome

Further analysis supports reducing regulation in some areas:

- *Age restrictions on participation in shooting activities under immediate supervision:* continuing to allow persons under 16 years old to use firearms in a club environment under the immediate supervision of a firearms licence-holder, as permitted under the Arms Act. Young people will continue to be able to use firearms in a controlled environment.
- *Restrictions on club committee membership:* not requiring club committee members to hold a firearms licence. Clubs will be able to seek committee members from as wide a pool of people as possible, which is particularly important when filling specialist positions such as treasurer.
- *Compliance burden:* reducing the volume of information required in applications for approval of a shooting club and certification of a shooting range, including by not requiring duplication of information available through statutory reporting by incorporated societies and charities.
- Because shooting clubs and shooting ranges are currently largely unregulated there will be an additional compliance burden to be able to provide information to Police. That compliance burden will now be smaller than proposed in the public discussion document.
- *Fees:* recovering only 50% of costs through fees, to recognise the balance of private and public benefit and the risks of non-compliance in a sector that is largely unregulated and which Police has limited visibility of.

Because there are no fees payable to Police now there will be new costs to shooting clubs and shooting range operators. A 50% subsidy will reduce most fees compared with those proposed in the public discussion document, and not discourage the use of clubs and ranges by firearm users.

- *Records relating to officers on duty at a shooting range:* not requiring recording of which individual officer is on duty at any given time. This removes what would have been an additional burden on those operating shooting ranges.
- *Record-keeping:* not requiring a shooting club to record the price, make, model and identification number of every firearm used by any club member at a club-organised shooting activity, and the name and firearms licence numbers of everyone who used it (or supervised its use) during the day. Submitters provided good examples of how hard this would be to implement in practice.
- *Public list of shooting clubs and shooting ranges:* not requiring or authorising Police to maintain a public list of approved shooting clubs and certified shooting ranges. The regulatory benefits to Police are limited and are considered not to outweigh the administrative burden and security risks.

Some revised proposals are stricter

On the other hand, further analysis supports strengthening regulation in some areas:

- *Club committee membership:* unsuitable people, such as those disqualified from holding a firearms licence, will not be able to be a member of a shooting club committee. However, this is balanced by not requiring club committee members to hold a firearms licence.
- *Pistol endorsement-holders:* requiring more comprehensive reporting of participation in club-organised shooting activities by pistol endorsement-holders. This will require pistol shooting clubs to report to Police members' participation, which is the current practice. It will also require pistol endorsement-holders to report their participation to Police, which is a new requirement.
- *Pistol shooting clubs:* strengthening their role in ensuring the safe use and possession of pistols, by preventing ongoing casual participation in pistol shooting activities by people who do not obtain a firearms licence and pistol endorsement and become and remain a club member.

Police developed the latter two proposals in consultation with Pistol New Zealand, the representative organisation for the pistol target-shooting sector.