

## List of submission issues (2017)

Sub #	Comment
1	Put a gun safe in rental house and it was easy to install and correct once you leave.
2	<p>Page 6 regarding fixing of steel cabinets – Why the requirement to fix an A category Steel cabinet to two surfaces. If done correctly one surface should be sufficient</p> <p>No problem with light weight steel cabinets like clothing lockers being unacceptable</p> <p>The images shown of acceptable steel cabinets are probably of E-Cat safes and images of acceptable A Cat safes should also be shown that would carry say 2/3/4/5 guns</p> <p>Pleased that the steel cable or Chain and lock are not mentioned, maybe should comment that they are now unacceptable.</p>
3	Prefers the April 2017 draft. The November draft eventually demands containers be made to British Standards (BS 7558). No one will know for sure that the safe is 'certified' and will need to get it checked. To get certified will cost firearms owners. No one wants to replace a cabinet that has been acceptable for years because of a change in 'policy'.
4	The April 2017 proposal is preferable and it defines the storage requirements suitably.
5	<ul style="list-style-type: none"> <li>Any solid steel construction safe 3mm or over that is bolted to the floor or wall should be the standard.</li> <li>Ammunition and bolts should be in a separate safe or lock box separate from the main safe.</li> <li>Wooden safes are not sturdy enough for the opportunist thief unless they are made of very thick heavy timber then i think they could be considered acceptable. 100mm thick on all sides.</li> <li>The biggest issue is lack of punishment from the Courts. Harsher punishment from the courts for repeat offenders.</li> </ul>
6	<ul style="list-style-type: none"> <li>Supports clarifying the standards by example in terms of Regulation 19. Regulation 19 intentionally provides a broad scope for securing firearms - in order to ensure compliance and enhance public safety. Indicators from non-intentional death and injury suggest that the security requirements are actually working, and in terms of intentional deaths, particularly suicide it also appears to be working - this is backed by research by Dr Annette Beautrais of the Canterbury Suicide project.</li> <li>Does not support places where police seem to attempt to rewrite the regulation, including redefining 'firearm' into sub categories.</li> </ul>

	<ul style="list-style-type: none"> <li>Suggested changes to the regulations include regulation 29. I think that this power of inspection needs to be extended to all firearms (by Police only not contractors)</li> </ul> <p><i>Letter</i></p> <p>I support the need for a security review, but the process isn't right. The key for me is that it rewrites law by policy, which police cannot do.</p> <p>For example: The regulations allow a person to secure their firearms in a rack. Whether we agree with that or not isn't the point. The firearm can be any firearm, other than an endorsed firearm. Police are trying to say a centre fire A cat cannot be stored in a rack. Yet the firearms favoured by criminals, shotguns and .22 rim fire can.</p> <p>If a person had their centre fire in a rack, police would need to refuse the licence, and a judge would reverse the refusal, because the law says the centre fire can be stored in a rack. Police need to follow process. They need to demonstrate that racks are ineffective. They then need to use this information to approach government for a change in regulation 19. This is a repeat of the 2008 MSSA debacle initiated by the then acting operations manager. It will be costly. It also bothers me that police are consulting through an advisory body, and have now gone public before that advisory body has had opportunity to consider and give advice, as a group. I predict someone will end up taking police to the cleaners, as they did in 2008. It is very worrying if this is the way police are going to operate.</p> <p><b>A lot of comments and changes reflected throughout tracked change document that Security Group will need to look at in detail.</b></p>
7	<p>I am in general commenting only on the November draft and the A Category sections. There is I believe a general consensus amongst gun owners that the minimum standard for A cat storage could be improved, but that it can be done within the current regulations.</p> <ul style="list-style-type: none"> <li>Minimal time for submissions and then date for publication short thereafter indicating no time for significant change. Asked for deadline to be extended.</li> <li>Was not clearly identified which version is the master, should have been clear.</li> <li>Poor grammar and other basic errors make it look like Police has rushed this.</li> <li>Comments on interpreting the law should be erased.</li> <li>Assertion that A Cat semi autos cannot be in the methods of storage classed as suitable needs to be removed. This creates a sub category of A Cat firearms.</li> <li>Receipt portion should be removed as it is for a licence.</li> </ul>

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As a class A firearms licensee, the key change in the Nov 2017 draft is a transition to a British Standard conforming locker over a specific period of time. I do not have issue with the change to steel cabinets this is in my view sensible, and I agree they should be robust, and properly secured' as the one I have is.

I am a Professional Engineer involved in the Oil and Gas industry so understand risk reduction.

I am always concerned when regulators in a particular market "choose" a specific standard for 2 reasons:

1. This reduces competition for suppliers in the region, and with the NZ market being relatively small could expose firearms license holders to additional cost. I would also challenge that in the Asia Pacific region whether a British Standard is suitable. My preference would be that either a suite of sufficiently comparable standards (Californian DOJ, US UL standard, perhaps a DIN/TuV standard from Germany/Europe). Particularly worrying is an extension to the standard that is being suggested (in terms of X mm steel). Shouldn't we be aligning our rules with those in Australia? Or at least the most gun owning states there? This would increase the pool of market hence competition for manufacturers, and thus costs.
2. There is no evidence provided that the existing rules have caused problems in the past, and that the adoption of this standard would solve those problems. It is easy to suggest a change to regulations by folks who are not actually having to bear the cost of changing.
3. With consumer goods in a market like Asia who is policing the standard? Who checks steel quality, who is measuring widths, etc.? In short what is to stop poor manufacturers making "clones" and selling them at premium prices into the NZ market? This will not improve the security of gun safes.

I believe the current system where cabinets are checked by an arms officer allows sufficient flexibility to capture the range of solutions in a far better way than a blanket ban on anything other than standard XYZ. The arms officers I have met have been professional people who take their role very seriously and this check carried out within a set of guidelines that ensures the cabinet is secure and decently constructed is a superior solution.

This is what was contained in your April 2017 draft and I would submit that you should revert to that draft.

9	<p>There are issues with both proposals because any police policies and practices must be consistent with the law; neither proposal is. Current police policy and practice is also inconsistent with the law. If the policies and practices are unsupported by the existing legal framework, then they are doomed (see <i>U11co/11 v Police</i> HC Palmerston North CIV-2009-454-473, 1 March 20 IO; <i>Practical Shooting Institute v Commissioner of Police</i> [1992] 1 NZLR 709 (HC).)</p> <p>Regulations 19 and 28 of the Arms Regulations 1992 sets out the conditions relating to security precautions. The legal authority for the promulgation of the regulation is s 74(1) (j) of the Arms Act 1983. The authority to prescribe security precautions for firearms is vested in the Governor General; not the police. Therefore police may not insist on security precautions that are not prescribed by Regulations made by order in council in congruence with s 74(1) (j). Regulation 28 is partially ultra vires because the Governor General has ostensibly delegated a non-delegable power by making security precautions subject to police approval. This delegation is not authorised by the empowering Act. Therefore the ostensible police veto is not enforceable because it is unlawful.</p> <p>The most often deployed safe used by civilian owners is under Reg 28, a steel safe. Police can use discretion to approve types and manners of fixing.</p> <p>If security regulations are not meeting the requirements and Police wish these changed they should seek change through the appropriate process to the Regulations.</p> <p>It is recommended that Police scrap the present proposal and any change in Law or Regulations be done properly thru the Government.</p>
10	<p>If Police has major concerns with theft and burglary they should step up their patrols in the near locations of the licence holders as an initiative, as per statutory duty.</p>
11	<p>Under proposed storage policy the 'A' category arms are now split into types. This is NOT in accordance with law. Why are you separating semi auto .22s from other sporting arms? As has been pointed out - this has serious ramifications for those renting.</p> <p>Although the total security of the residence will be considered, racks will only be considered for approval in the following circumstances:</p> <ol style="list-style-type: none"> <li>1. Used only for shotguns and bolt action rifles.</li> <li>2. Not being used for the secure storage of centre-fire or ri1n-fire semi-automatic rifles.</li> <li>3. Then they are bolted to a solid floor and in a concealed location such as a wardrobe which has a solid door with a strong locking mechanism.</li> <li>4. When they are bolted to a reinforced roof strut or supporting bean1 in the roof cavity.</li> <li>5. They are able to withstand violent pushing and tugging and not wobble, become loose or welded points becoming fatigued.</li> </ol>

	<p>From the April draft:</p> <ol style="list-style-type: none"> <li>1. Under rooms of stout construction: My door is legal under the above but this is stupid. If you are locking a mechanism that holds bolts then this should be done at the strongest point allowed by physics. If that is in the middle of the door - away from the edge - so what? This needs to be made clear.</li> <li>2. It needs to be made clear that this only applies to buildings that are in themselves the storage safe. The current placement and wording suggests an extension of previous security requirements.</li> <li>3. You repeatedly say don't store the ammunition with the gun. Then suddenly it OK to. Does 'not capable of being discharged' simply mean don't keep these loaded? If so please clarify. I would argue that if you have a strong room, or simply room in a gun safe, then AMMO should be stored there. It keeps it safer.</li> <li>4. The current wording would not allow for a collection to be displayed or for a collector to take their firearms to a meeting of collectors or show a firearm to a potential buyer or to be left under security for an auction or gun show after setting up the night before. This needs to be made clear. Perhaps also adding 'Or other reasonable purpose'. So if Police don't find an immediate problem they can let everyone get on with their day.</li> <li>5. Lastly - any consideration of security MUST come with a demand from police for a ten year mandatory minimum and non-parole sentence for anyone who steals a gun. Or this is all a joke.</li> </ol>
12	<p>This submission will cover points from BOTH draft documents.</p> <p>It is patently unfair to adopt the British Standard 7558 as our standard for security. The British for all intents and purposes have a ban on firearms for civilians. This ban does nothing to stop the criminals getting their hands on firearms, it just makes the prospect of owning a firearm for a law-abiding sports shooter financially unviable. Once again, the law targets the wrong people.</p> <p>It is patently unfair to separate A-cat semi-automatic firearms from shotguns and bolt action rifles. Semi-automatic firearms, according to the Police's own data, account for less than 2% of all firearms seized in the last ten years. It therefore stands to reason that these firearms are used in</p>

	<p>less than 2% of a firearms related crime. Criminals usually prefer the shotgun. Having to increase ones security simply because they own a semi-automatic weapon for legitimate sporting use, will cause significant problems for those of us renting. Also this suggestion goes way out of line compared to The Arms Act 1983.</p> <p>The outline of the security requirements state: "prevent access by children, prevent access by unlicensed persons, and prevent theft". The current requirements are perfectly sufficient for this.</p> <p>The police should instead be working with the Judiciary to come up with mandatory minimum non-parole sentences for firearms related crime. As an example, possession of an illegal firearm should carry a mandatory minimum non parole sentence of ten years. Aggravated robbery with a firearm should carry a mandatory minimum non parole sentence of at least fifteen years.</p> <p>Make the penalty fit the crime. The current penalties are a joke, and do nothing to deter the criminals.</p> <p>Make the penalties a proper deterrent.</p> <p>Do not waste time and money (including that of a quarter of a million Law abiding citizens) making up silly rules to make life harder, when the current rules are perfectly sufficient.</p>
13	<p>I see the timeframe for making submissions is fairly tight (1 Dec) – have had several people + a large rifle/shotgun club raise concerns with me about the very short timeframe.</p> <p>April Doc :</p> <p>Padlocks for racks, document states – Substantial Padlocks – Believe this should say Substantial high security rated hardened steel shackle padlocks. Images of steel safes/cabinets clearly appear to show ammunition stored on a top shelf with the cabinet or separate locked box: the document states that ammunition to be secured separately. What is pictured appears to be contrary to the Arms regulation requirements (Reg 19) about the storage of ammunition. I would be of the view that if the cabinet was breached, any internal lock box could also be breached to gain access to the ammunition. Clearly no issue if the firearms have been rendered inoperable/not capable of being discharged by removal of bolts/magazines. These component parts would again need to be stored completely separate/different location to where the firearms are kept.</p> <p>(b)the holder, where he or she has both a firearm and ammunition for it in his or her possession, either—</p>

	<p>(i)shall take reasonable steps to ensure that the ammunition is not stored in such a way that a person who obtains access to the firearm also obtains access to the ammunition; or</p> <p>(iii)shall ensure that, where the ammunition is stored with the firearm, the firearm is not capable of being discharged:</p> <p>Nov Doc:</p> <p>Racks &amp; Wooden Cabinets – appears that these would/could only be used for shotguns &amp; bolt action rifles. And that centre-fire or rim-fire semi-auto would be subject to enhanced storage requirements. Question/observation: so where do semi-auto shotguns fit in? Assume these should also be subject to enhanced storage – need to amend point 2 to Centre-fire or rim-fire semi-automatic rifles &amp; shotguns. Point 3 – fixing of racks – stipulates solid floor or roof strut or supporting beam in the roof cavity: why isn't there an option for wall fixing into studs/dwangs? Also: appears no guidelines or confirmation about locking mechanism/padlock strength and performance etc. apart from reference to a “strong locking mechanism”.</p>
14	<p>Firstly a much more punitive approach to repeat offenders who steal firearms. 5 years for a second offence, 10 years for a third offence, no parole allowed. More police resources committed to this area.</p> <p>If we move beyond stout wooded boxes safes for A cat. Firearms storage we will have a lot of noncompliance. Remember it isn't the firearms legal owner that causes the problem. It is the criminal element of society that's causing the problem, and that is really where the problem is, eliminate criminals, problem solved. The justice system isn't backing up society.</p> <p><b>Maybe we really do need to bring back the death penalty. Executed criminals never reoffend, and also stop causing a financial problem for society.</b></p> <p>This leaves more resources for other government projects.</p> <ul style="list-style-type: none"> <li>• So we should continue to allow robust wooden containers for A cat firearms ownership-storage. And remember many firearm owners live in apartments so the current security concerns are not easily addressed, thing like Body Corporate rules etc. These people need to be thought about.</li> <li>• The document also talks about ammunition storage. Basically as I understand the situation as long as the ammunition is locked away, no other security is required. And remember as it is safety ammunition class 1.4s you are allowed up to 10 tonnes in procession. No additional permissions are required, maybe except from your insurance company, in terms of valid cover.</li> </ul>

	<ul style="list-style-type: none"> <li>• Also I believe an act of parliament would be required to change the regulations pertaining to A CAT. Firearms storage and 1.4s ammunition storage.</li> <li>• Taken literally the proposed recommendations would put very severe conditions on the storage and display of firearms and ammunition in retail shops. This is extremely undesirable, and surely not what was intended. Legal firearms owners are now one of the largest sporting groups in the country, and politicians are beginning to realise this. More people use firearms than play rugby.</li> <li>• Meeting timing of the Security Sub Committee and the draft release has given the impression that no serious consultation has taken place.</li> </ul>
15	<p>The process is not right. Regs allow a person to secure their firearms in a rack whether we agree with that is not the point. The firearm can be any that is not an endorsed one. If Police want to prove these ineffective storage they then need to approach Government for a change to Reg 19. My other concern is that Police has gone public with the combined Police/advisory subcommittee draft without first giving the full FCAF time to consider and comment. I predict that someone will take Police to the 'cleaners' as they did in 2008 (MSSA). It is very worrying if this is the way Police are going to operate.</p>
16	<ul style="list-style-type: none"> <li>• The suggested requirements are very complicated and my experience suggests there should be a separate short summary page that refers to those requirements. Or maybe the technical details of storage cabinets should be in a separate document/booklet?</li> <li>• I also see that for storage purposes .22cal rimfire sporting rifles have been accorded different rules than bolt-action, lever-action and pump-action rifles and shotguns. For what reason? Is a 12g pump-action shotgun with a pistol grip and a folding stock less dangerous than a .22rf semi auto rifle?</li> <li>• By The Way the reason .22RF calibre rifles were allocated a 'bigger capacity' magazine in 1992 was that at that time most semi-auto .22RF calibre rifles had fixed tubular magazines that had to be loaded one shot at a time while attached to the rifle.</li> <li>• Further comment 'do we want people to not comply due to onerous rules?' They will still have their firearms but will forgo the licence if it is difficult to comply.</li> </ul>
17 A & B	<p>Please find attached my personal comment on the Firearms secure storage draft being circulated at present.</p> <p>I have also attached a note which I have included with my comment on one of the earlier versions of pol67 security drafts, this refers to a drawing / drawings and other stuff on the police web site at the time. I've included this here as I refer to it again and I believe it contains some useful information, still relevant.</p> <ul style="list-style-type: none"> <li>• Remove all reference to full bodied steel keep.</li> </ul>



	<ul style="list-style-type: none"> <li>• Have consistent photography that complies with rules.</li> <li>• British standard safes may not be able to resist attack for the required 8/10 minutes</li> </ul> <p>I see You have abandoned any reference to lock standards rather than fix the contradictions. I believe this is rather extreme and leaves the mortise lock requirement open to "interpretation" Have you thought about sliding doors and ranch sliders which are not secured by a mortise lock? This draft also ignores electronic locks etc. which in my opinion are worth including in any update.</p> <p><b>Has made comment by tracked changes and attached draft.</b></p> <p><b>18B:</b> Another draft to comment on! I will wait till the next.</p>
18	<p>I have looked through the draft proposal, my issue is that if the problem is theft of firearms, the proposal only aims its requirements at the legitimate owners.</p> <p>If the overall objective is to reduce theft, the NZ Police and Judiciary need to switch their focus to those who steal firearms and who have possession of them illegally. Introduce a mandatory, no parole sentence of 10 years for convicted offenders. Second offence, 15 years. Criminals do not reform their behaviour when awarded community service or home detention. Criminals reform their behaviour when the sentence outweighs the benefit of offending.</p> <p>In closing I would like to make a final observation. Any safe, A, B, or E category compliant can ultimately be opened with a simple knife. If a burglar who has targeted a firearms owner, holds a knife to the throat of the licence holder or their partner, that safe will get opened.</p> <p>Publish clear and unambiguous standards for safes allowing NZP staff to assess security consistently and use existing legislation to deal properly with those the hold firearms illegally, or resort to theft of firearms.</p>
19	<p>Resent due to incorrect email address being given by Police.</p> <p>The policy separates 'A' category shotguns and bolt action rifles from 'A' category semi auto rifles in what level of storage would be considered acceptable.</p>

	<p>This is a nonsense and an unnecessary inconvenience of cost and replacement of storage device for those who are currently within the law in using any of the current methods of storage for their centrefire 'A cat' semi-automatic rifles.</p> <p>The police have not demonstrated any increased risk of harm from such weapons or shown a link to increased risk of theft either. 'A' category is 'A' category! An arbitrary differentiation serves no purpose.</p> <p>My submission is that because of this, all 'A' category firearms should be subject to the same reasonable level of security and storage as has been acceptable until now. No differentiation should be included in any modification of policy.</p> <p>The receipt form needs to be changed to remove the words, — "and the New Zealand Police". Licence holders are subject to the relevant act/s of parliament. Not police policy or arbitrary changes brought about by individuals in any dept. We should not be forced to sign a document that is outside of the law or its intent.</p>
20	<p>I would like to make a point that the attempt to phase out racks and wooden cabinets for A cat firearms by this method is unlawful because both are expressly allowed by the Regulations. Likewise for Endorsed firearms the need for a steel safe or cabinet to be to be inside a room of stout construction as implied by this document is contrary to what the current regulations state.</p> <p>If you read the document carefully you will find plenty more to comment on, such as the attempt to make two classes of A Cat firearm by not allowing semi auto to be kept in a rack or wooden cabinet, again the current regulations do not make this distinction.</p> <p>A waste of money and time, current Regs etc. are adequate. Go after criminals not law abiding firearms owners.</p>
21	<p>I have chosen to comment only on the November draft (referred to herein as "the document"), as that is clearly a development of the April draft.</p> <p>Security</p> <p>There appears to be a requirement for a person to have security measures in place at their normal place of dwelling prior to being able to be issued with a Firearms Licence. The Arms Regulations do not state this, however it has been seen to be interpreted that way by some vets.</p>

As written, the document does not specifically cater to those who may use firearms not owned by themselves and in the absence of the owner. This can, and probably will, lead to confusion and interpretation of the rules to the disadvantage of some applicants.

The document should clearly state that the security may be provided at an address not belonging to the applicant, for instance where a user does not own firearms, or may store them at another person's property, or at a gun club, but does otherwise have a legal right of access to them.

#### Assessment of Secure storage

It is stated that the purpose is to "prevent the theft of any firearm". This requirement is not possible to achieve. I agree that owners should take reasonable steps to prevent theft (and all responsible owners would anyway), however there is nothing that can guarantee this (If there was, banks would not be robbed. Evidence suggests otherwise).

The document should state that the purpose is to "minimise the risk of theft of any firearm", or words to that effect, which is what is stated in the regulation 19.1.c.

It is also stated that the purpose is to "Ensure that ammunition is not stored in such a way that a person who obtains access to the firearm also obtains access to the ammunition etc." Again, this is not possible. If a thief can breach one secure cabinet, he can certainly breach a second.

The document should talk about "minimising risk" as per the Arms Regulations.

#### Alarms.

It is all well and good for Police to recommend the use of an intruder alarm system, however this clause should not be included in the document.

The reason for exclusion is that some vets may construe the recommendation as a requirement. Yes, this does happen.

Alternatively, the document should make it abundantly clear that this is a recommendation, not a requirement.

#### Use of Gun Racks.

The exclusion of centre-fire rifles and semi-auto rimfire rifles from storage in racks is purely a Police invention; it has no basis in either the Act or the Regulations.

The exclusion also is illogical. It is based on the Aramoana incident of November 1990, in that the gunman used semi-automatic rifles. Given the timeline, he could have achieved the same with a muzzle-loader.

An effectively designed and properly constructed rack will render the theft risk little different to that afforded by an A-category safe.

Wooden cabinets.

The requirement for wooden cabinets to “be stout” is too subjective.

The requirement for a wooden cabinet to be Plywood is unnecessarily restrictive and illogical; a cabinet constructed of, say, 50mm thick hardwood planking will be far more “stout” (as defined in the document) than a 16mm plywood cabinet, yet would not be permitted.

The definition of “stout” is very poor. The only way that this can possibly be assessed is by the destruction of the cabinet (I’m sure not many owners would be happy with that!). A qualified structural engineer may be able to have an educated guess at how “stout” a wooden cabinet is, however I very much doubt that Police will be hiring such people to conduct assessments. I believe that the design requirements for wooden cabinets be reviewed, and written in such a way that they may be assessed objectively.

As I have stated regarding Racks, restricting wooden cabinets to shotguns and bolt-action rim-fire rifles is illogical, and inconsistent with the Regulations and the Act. This exclusion should be deleted.

Steel cabinets

The requirement for fixing to the building is inadequate, and not able to be checked without disassembly.

The requirement specifies minimum fastener dimensions, but not quantity. I believe that the requirement should simply be that the cabinet be “securely fixed to one or more rigid surfaces or supports.” (Etc. as written in the document).

The document could recommend the size and nature of the fasteners, but must make clear that this is a recommended minimum, not a mandatory requirement.

I agree with the statement that commercial lockers are inadequate.

Wherever steel cabinets are mentioned, it is limited to mild steel. Stainless steel is much harder to cut than mild steel, thus can be thinner whilst being more resistant to attack. Police should seek advice from a suitably qualified engineer to assist in specifying minimum thickness requirements for different types of steel.

#### Windows of Buildings

Why do Police not accept louvre windows? If security grilles are fitted as required to all windows and skylights, the type of window fitting can be of no consequence as entry will be difficult in all cases (note – entry will not be impossible; banks still get robbed, remember..). I cannot imagine why anyone would want louvre windows in a gun room, but to ban them is illogical.

#### General

The document presented seems to somehow grant Police the power to create their own regulations subsequent to those set by statute. This is inconsistent with the (correct) approach taken by Police in other matters; that their job is not to make the rules, but to enforce them.

Neither the Act nor the Regulations make any reference to semi-auto rimfire rifles or centre-fire rifles as being any different to other A-Cat firearms. The creation of this division by Police is unsupported by the legislation, therefore is surely unlawful in itself. There is a clear expectation of the Police by the NZ public that Police uphold the law, not create it.

The rules and regulations should be written clearly, objectively and concisely, and set by statute so that the Police can feel no need to create their own set. A well-written set of rules will make assessment simple and consistent for the vets; the current draft does not provide this. There is known to be considerable differences of opinion between vets now, and that needs to be rectified. This is the opportunity for Police to achieve uniformity of assessment. Police should be working with Government to update the Arms Regulations in a meaningful and explicit way.

With regard to children accessing firearms, this will still happen. The rules will make no difference. Responsible owners will, as they have done for a long time, take the necessary steps to ensure

	<p>children do not gain access to firearms or ammunition. Sadly, there are many irresponsible people who do not take such measures. I think it not unfair to suggest that many of these won't even possess a licence, so enhancing the security requirements is unlikely to make any difference for them.</p> <p>With regard to unlawful acquisition of firearms, no regulations will provide any significant impact. No matter how good a security system is, it can and may be defeated. On top of that, I suggest that there are significant numbers of firearms entering the country illegally. The Police's own statistics that show a greater number of firearms seized than have ever been reported stolen. The balance must have come from somewhere.</p> <p>The document title should include the word "Guidelines" (e.g. Guidelines for the Secure Storage of Firearms"). As-is, it purports to be the regulations. It is not. Allowing this to be implemented as being the regulations is nothing short of corrupt.</p> <p>The next draft should be an improvement on this. A cynic would suggest that due to the consultation process, Police have tried to sneak this through.</p>
22	<p>To summarise:</p> <ol style="list-style-type: none"> <li>1. Don't differentiate between existing "A" class firearms.</li> <li>2. For non-endorsed firearms phase in steel cabinets with new license applicants, effectively "grandfathering" the existing wooden cabinets.</li> <li>3. No change to existing endorsed firearms security provisions.</li> <li>4. Ensure consultation is carried out correctly, it's a two way street, not one way.</li> </ol> <p><i>Full document available in folder</i></p>
23	<p>I am writing to comment on your proposed changes by policy of the secure storage of Firearms as laid out in the above documents. Firstly in both versions you are trying to re-classify A-Category Semi-Automatic Firearms by way of separate security requirements compared to other A-Category Firearms. This contravenes the Law. Also in both versions you require Firearms Owners to sign a contract whereby you threaten revocation of the Firearms License and/or any endorsements if it is not signed.</p> <p>"I acknowledge receipt from the New Zealand Police of a copy of "SECURITY CONDITIONS AND REQUIREMENTS FOR FIREARMS LICENCES AND ENDORSEMENTS" (Police Form POL67N). I understand that the Police may revoke the licence or endorsement(s) if I fail to observe any of</p>

	<p>the conditions imposed by the Arms Act 1983, the Arms Regulations 1992 and the NEW ZEALAND POLICE AS SET OUT IN THE DOCUMENT</p> <p>This is absolutely outrageous when you consider that the highlighted part of the quoted text is Police Policy not Law. In short this is an Ultra Vires practice where Police are overstepping their mandate as enforcers of the Law not the makers of the Law. Also this then when signed will apply to any future Policy changes by Police. And it has to be asked will an applicant's security not be approved if the said receipt/contract is not signed. In short Police are attempting to implement policy that has no legal standing. Being forced to sign this policy would remove our rights under the Arms Act. We saw Police attempt this earlier this year with the 2017 Arms Code.</p> <p>There are issues with both proposals because any Police policies and practices must be consistent with the Law; neither proposal is.</p> <p>Regulations 19 and 28 of the Arms Regulations 1992 sets out the conditions relating to security precautions. The legal authority for the promulgation of the regulation is s 74(1) (j) of the Arms Act 1983. The authority to prescribe security precautions for firearms is vested in the Governor General; not the Police. Therefore Police may not insist on security precautions that are not prescribed by Regulations made by order in council in congruence with s 74(1) (j). Regulation 28 is partially ultra vires because the Governor General has ostensibly delegated anon-delegable power by making security precautions subject to police approval. This delegation is not authorised by the empowering Act. Therefore the ostensible police veto is not enforceable because it is unlawful (see Hawkes Bay Raw Milk Producers Co-op Ltd v NZ Milk Board [1961] NZLR 218 (CA).).</p> <p>If the Police believe that the present security requirements set out in the Arms Regulations are inadequate, the response ought to be directed at changing the law rather than the Police policies and practices. Trying to foist unauthorised (and therefore unlawful) Police policies on civilian gun owners and enforcing them by unauthorised practices bypasses the parliamentary process and oversight of the legislature; that is unacceptable in a free and democratic society such as New Zealand and as previously discussed, doomed to the same judicial rejection as the police pistol grip policy in 2009.</p>
24	<p>1) For endorsed firearms owners, steel safes are now required to be in a room of stout construction. This contravenes the current Arms Act regulation where a safe is allowed to stand on its own, when safely secured to the room it is in. People who live in rental properties will find it</p>

	<p>exceedingly difficult to comply with this, as the landlord will not allow the conversion of a room into one of stout construction. Furthermore not many people will have the ability and or space in their own house to construct a stout room to house their safe with restricted weapons.</p> <p>2) For A category firearms owners, the indication that wooden cabinets and gun racks will be phased out and only safes will be acceptable for their storage also will negatively impact many firearms owners who will either not be allowed a safe installation by their landlord or will not be able to fit a steel safe in their house due to space constraints. Particularly hunters or target shooter who only possess a single rifle secured to a gun rack, will find this change very unfavourable.</p> <p>Furthermore the suggestion that the A category firearms be separated in 2 categories, one of semi-automatic and another of shotgun and bolt action rifles also contradicts the Arms Act. Recreational hunting shooting and collecting is a hugely popular activity in New Zealand with 250000 firearms owners in the country I implore you not to implement the above changes as it will have a detrimental effect on many from enjoying their hobby.</p>
25	A BIG NO to both documents from me.
26	<p>Yes I am ALL for Gun Security for licensed owners, And I think the current legislation / rules are sufficient.</p> <ul style="list-style-type: none"> <li>• More concerned with Police disarming gangs and the illegal possession of firearms, we as citizens have a right to safety and freedom from fear and harassment.</li> </ul>
27	<p>This policy that is trying to be implemented is rubbish.</p> <p>Re wooden storage boxes, you say it must be able to withstand attack with hand tools for 10 minutes. I could get in to one in 10 seconds with any axe!</p> <p>Also, I will not be signing anything that circumvents the arms act! If police want the law changed, there is correct procedures to go through.</p> <p>If you want to improve security and have less firearms getting into the hands of criminals I suggest you consider having a secure storage option at police stations.</p> <p>I, like many FAL holders, have a number of firearms but tend to have a couple of favourites that I use the most.</p> <p>Would it not make sense to have firearms that I'm not currently using in more secure storage?</p>
28	<ul style="list-style-type: none"> <li>• Which draft is actually being proposed? The differences are often subtle, although some not so subtle, and therefore providing two drafts could be easily interpreted as disingenuous in intent.</li> <li>• There is a confusing mix of copies of legislation, copies of regulation, purported Police "policy" that appears to a greater or lesser degree to be outside of the mandate of</li> </ul>



	<p>legislation and regulation, and advice. I hazard that it is intentionally unclear as to where the lines between these are drawn.</p> <ul style="list-style-type: none"> <li>• The legal basis for any Police “policy” (intended to have legal effect and be enforceable) generally is only legislation and regulation, and the situation is no different in respect of requirements for firearms security or any other firearms matter. The relevant legislation and/or regulation should be presented up-front, as they are the only instruments that provide Police with a mandate to make “policy” with any legal right of enforcement.</li> <li>• Police “policy” imposes on licenced firearms owners, therefore, can only be made under a specific, and relevant, provision in legislation or regulation.</li> <li>• Each policy statement must at a minimum:</li> </ul> <p>First - have the references provided quoted in full for the specific legislation or regulation empowering Police to make this specific policy;</p> <p>Second - if it is at all unclear why the reference legislation or regulation empowers the Police to make “policy”, have the Crown legal opinion or court ruling that Police are relying on provided in full;</p> <p>As an example, if Police “policy” is seeking to increase the security requirements for storage of A category firearms, there would appear to be no provision for this “policy” under either legislation or regulation. The legislation here sets out clearly the requirements and does not have any provision for Police to make further “policy” requirements.</p> <p>Finally - the policy itself should be set out.</p> <ul style="list-style-type: none"> <li>• Advice should be clearly separated out so there is no confusion either for Licenced Firearms owners or the members of Police charged with enforcing lawful Police “policy”.</li> <li>• Trust in the Police has been eroded</li> </ul>
29	<p>There seems to be any amount of 'tinkering' on this storage subject, to what end I have to ask? I believe that 99.9% of Fire-Arms Owners are genuine, law-abiding citizens who comply with all the attendant responsibilities of a FAL in whatever category their Fire-Arms fall. My recent renewal was carried out judiciously and competently by an ex-Policeman and the interview and inspection was what was required for the licence. It would seem that external influences are trying to apply pressure to a system that is achievable and ensures that all the requirements are adhered to by FAL owners.</p> <p>The under resourcing of our Police Force should not be further stretched by any more regulation with dubious benefits. They should be able to target the REAL CRIMINALS, which the best will and security in the world will not prevent the latter from stealing and dealing in stolen firearms. Registering individual firearms has been a failure in Canada and all the arms amnesties in</p>

	<p>Australia are not able to prevent firearms from being stolen, the cost would be prohibitive [as Canada are finding out after many years.]</p> <p>If the legislation is to be changed, it should be changed to be much more punitive, so that offences are dealt with real incarceration times with no bail, no parole.</p>
30	<p>Your interpretation of section 28 (1) is not in agreement with the arms amendment act, which states either a strongroom, stout room, OR steel safe is acceptable. The act does not mandate a safe in a room of stout construction.</p> <p>Section 19 of the arms act does not require semi-automatic A category firearms to be stored differently to other A category firearms. It is unclear why this distinction is being made, other than a general dislike of semi-automatic firearms.</p> <p>Your plan to mandate steel safes over a ten year period disagrees with the storage requirements in section 19. Your document does not specify a minimum steel thickness for a safe containing non-endorsed firearms. Those currently on the market are 3mm thickness, for A-cat, and 6mm for E-cat.</p> <p>While it is hard to argue with the pretence of this document, it appears that NZ Police are once again attempting to use interpretation of legislation to obligate licensed owners to undertake security measures that are in excess of that required by law. One assumes this will lead to court proceedings challenging the police position with regard to requirements stipulated in the arms act.</p> <p>Shouldn't this process happen via a change in legislation, rather than a change in interpretation of legislation? That way a balanced viewpoint could be presented from licensed owners who bear the costs of these security measures, as well as the police position that stolen firearms are a major source of criminally acquired firearms and that this can be prevented by the measures presented in your document.</p> <p>Licensed firearms owners still remember vividly the debacle that was pistol grip stocks, and I would suggest that engagement would be better that continued changes in interpretation that place an ever increasing burden on those licensed owners who are inherently unlikely to use their firearms illegally.</p>
31	<p>The separation of A category firearms into separate types (shotguns and bolt action rifles vs Semiautomatic centrefire and rimfire rifles) each requiring different security.</p>

	<p>One can only theorise that this is leading the way to yet another category of firearm with new policies and restrictions. With most of the 250,000 A category licenced firearms holders being affected by the change in security for semiautomatic rifles – this brings a huge logistical cost to both the licenced owner and to the Police vetting service.</p> <p>If the reason is to tighten security around semiautomatic firearms to prevent theft, then I suggest what would be more effective in deterring criminals from stealing firearms, is ensuring the punishment is high. I.E. a 10 year mandatory minimum, non-parole sentence for the theft of firearms in New Zealand. That would send a strong message to criminals and they might think twice before attempting to steal firearms from licenced firearms owners.</p> <p>As in the case when premium cars developed smart keys with chips in them to prevent theft, thieves would then steal the keys first, then steal the car. If thieves are motivated to take something – they will find a way – that is why I suggest the better deterrent is increasing the risk to thieves by increasing the punishment.</p> <p>My other concern is how the Police have simply drafted a document with a short consultation period before trying to force this into place. The Police are there to enforce the laws – not to make them. This is another example where Police wish to categorize semiautomatic rifles, but have acted without authority to try slip this through without going via the proper process of bringing changes into law.</p>
32	<p>The draft dated April 2017 is a reasonable and fair document.</p> <p>However the document dated November 2017 is not. This document is putting more pressure and cost on Licensed Firearms Users. Noting in this world is thief proof, given the right amount of time, resources and determination any safe can be broken into. Criminals will always find a way to get their hands on firearms, and i do agree that licensed firearms owner can take additional steps like alarming the homes and dog etc., to reduce the risk of theft. We also need to look and other means of deterring criminals, like hash sentences for firearms theft and crime. I point your attention to the charges laid against Kupe Matenga, who committed armed robbery with an illegal handgun and a list of other offenses in the events that followed, with parole will serve about 10 months. Not to mention that ACC will probably pay compensation for his self-inflicted gunshot. Yes we need to make changes, but not in security and restriction of Licensed and 'fit and proper' firearms owners, but it the way we handle criminals and the sentencing for firearm related crime</p>
33	<p>1) Please stay within the current law. Racks and cupboards are specifically provided for.</p> <p>2) A Ruger 10/22 is NOT an AR15 and is not capable of creating the same deadly mayhem in the wrong hands. Please don't use new storage requirements to create a new class of firearms.</p>

	<p>3) A 5-10 year rollout of modest changes is reasonable but you do need legislative change first.</p> <p>4) Please don't try and make firearms storage so expensive and such a hassle that good, ordinary people won't be able to own them. Remember that many landlords are not willing to have major alterations done to their properties</p> <p>5) Please also recognize that a lot of the firearms criminals use are not stolen, but imported. I know the NZPA doesn't like this narrative but there is some validity to it.</p> <p>Thank you for the opportunity to comment.</p> <p>One question: Who in their right mind thought that 11 days was a sufficient period for "consultation" with the firearms community? I would really like to know. Someone deserves a serious kick in the arse for that and I will be making that plain to the new Minister of Police. In triplicate.</p>
34	<p>Against any changes in current laws. The police have been given parameters to work within as have we, licensed firearms owners. They need to stop attempting to over reach their legal position with Ultra Vires Policy. The police have time and time again, shown that their own officers are unable to safely store and operate firearms and police officers are not even required to have a firearms license in order to operate firearms. Please leave the law making to the government and leave law abiding licensed firearms users to go about their affairs without undeserved interference.</p>
35	<p>I have read the proposed police policy recommendations of the November 2017 draft i wish to express my heavy disapproval a couple of points related to this draft, The suggested changes are currently are not included in the Arms Act and will very negatively impact a large number of law abiding firearms owners and collectors</p> <p>The Proposed changes I disapprove of are as follows: For endorsement entitled firearms owners, Steel safes are required to be in their own separate room, This contradicts the current Arms Act regulation where a safe is allowed to stand on its own, when safely secured to the room it is in. People who live in rental properties will find it exceedingly difficult to comply with this, as the landlord will not allow the conversion of a room into one of stout construction. Furthermore not many people will have the ability and or space in their own house to construct a stout room to house their safe with restricted weapons.</p> <p>My Second point For A category firearms owners is the indication that wooden cabinets and gun racks will be phased out and only safes will be acceptable for their storage also will negatively impact many firearms owners who will either not be allowed a safe installation by their landlord or</p>

	<p>will be unable to install a the steel safe required, due to costing and sizing constraints, mainly hunters or target shooters who only own a single rifle that is stored in a gun rack or storage cabinet, to add to this the recommendation to suggest that A category firearms will be put into two classifications of Bolt action and Semi-automatic also contradicts the arms acts, Recreational hunting, shooting and collecting is a quite popular in New Zealand without 250k+ firearms owners in the countries and I wish for you not to implement the above changes as it will be detrimental to Shooters and collectors alike who love and enjoy their hobby.</p>
36	<p>I store my firearms in a steel safe that is bolted to the concrete floor and wall also and have stored them like this for 30 years, it is not a problem. Considering the rise in crime in recent years i think all gun owners should have steel safes, i have lived at rural properties that have been burgled 3 times, and no guns were taken thanks to proper storage. Plywood boxes with catches and padlocks are not good enough in this day and age.</p>
37	<p>It would appear that both documents propose changes that are not lawful. Such as phasing out racks and wooden cabinets for A cat firearms, both are expressly allowed by the Regulations. Likewise for Endorsed firearms the need for a steel safe or cabinet to be inside a room of stout construction as implied by the November document is contrary to what the current regulations state.</p> <p>The attempt to make two classes of A Cat firearms by not allowing semi autos to be kept in a rack or wooden cabinet, again the current regulations do not make this distinction.</p> <p>Police focus on licenced firearm owners is misguided.</p> <p>I would rather police resources are spent improving positive outcomes from the points I make below.</p> <p>Of the 537 firearms reported stolen in fiscal year 2016-2017 only 24 were recovered, this is a poor recovery rate. Police do not keep records on how and where these firearms were stolen. It is entirely possible that many were stolen from security higher than called for in current regulations. Criminals possess and use illegal firearms in New Zealand for three reasons. They have a desire for them. They have the money to act on that desire. They have no fear of acting on that desire.</p> <p>In the majority of cases criminal use of firearms in NZ, once convicted, result in little or no deterrent. The recent Kupe Matenga sentencing is one example, with parole he will serve ten months in jail, when a sentence of 14 years for aggravated burglary was available to the judge, for</p>

	<p>just one of Kupe's many convictions. Other similar cases with resulting light sentences are many and easy to find.</p> <p>Police should focus on criminals and penalties that would make a real difference in making safer communities in NZ, by demanding Parliament and Judges impose sentences already available in current law.</p>
38	<p>1. What is being proposed for A cat firearms is in conflict with the present regulations and unlawful. Making two classes of A cat firearms is also in conflict with the present regulations and unlawful.</p> <p>2. Many owners may feel that steel cabinets are the preferred option for category storage but that is not always practical in every home situation. This is why the regulations allow simpler and more affordable options such as racks and wooden cabinets.</p> <p>3. Regarding Endorsed firearms. There is no clear guidance for the construction of steel cabinets or Strong rooms. The Regulations DO NOT require a steel cabinet to be kept in a room of stout construction but allow three options, a strong room OR a room of stout construction OR a steel cabinet.</p> <p>4. Regarding the "contract" at the end of the document. This should be removed as there is no legal requirement for a licensee to acknowledge police policy or law by signature, only to comply with the law. A Licensed Firearms Owner is only bound to comply with the Act and Regulations, not this document which is only a guide.</p> <p>Although Police have sought consultation with the public, this consultation does not appear to be genuine or in good faith. The general firearms community has only become aware of this consultation through social media on or around 18 November 2017.</p> <p>With a close off date specified by Police of 1 Dec 17, this leaves only 11-12 days at most for the community to consider the documents, analyse the differences between current policy and the November draft, seek legal advice on individual or collective community impacts and respond accordingly. It is difficult to believe there is genuine intent to consider submissions in good faith, discuss concerns with the community, negotiate amendments or investigate alternatives to any concerning areas of policy.</p>

	<p>In summary, both the consideration time available to the public and the proposed finalisation date of this policy are unreasonable if genuine consultation and a quality, equitable policy is to be formulated. I request that NZ Police extend both deadlines in order to demonstrate good faith and genuine consultation with the community.</p>
39	<p>My submissions centre on the process of policy formation and submission and how it differs radically to that carried out at the national and local level. It appears to be wholly non-compliant.</p> <p>1. Consultation with potentially affected parties.</p> <p>The consultation period is unlikely to meet the legal tests of “meaningful” consultation in that given the significant number of individual licence holder (220,000+ and others potentially looking at obtaining licences)) there is a remarkably short period of time to read, assimilate and assemble cogent submissions. Many might construe the unreasonably tight timeframe and timing as a deliberate attempt to frustrate the process. Moreover as this affects individuals and their property rights and financial liabilities any prior consultation does not address the interests of the individual. The various lobby groups may not fairly represent the individual.</p> <p>Relief sought: Extend the submission period to mid-2018</p> <p>2. Cost benefit.</p> <p>How can any one individual or group sensibly comment on the proposals without estimation of costs and benefits (to the individual). No data on cost/benefit means that proposal contains insufficient information upon which to base decisions for license holders to submit on. What is more licence holders are in effect being asked to take on an unknown cost for unknown benefit? This is both unfair and unreasonable and is a total frustration of process.</p> <p>Relief sought: Carry out a cost benefit analysis, have it independently peer reviewed (please include in any estimation building consent fees, legal and contractor fees etc. within an estimation of costs to potentially affected parties). Provide copies to all potentially affected individuals as part of an extended permission period.</p> <p>3. Policy analysis.</p> <p>No data surrounding the issue of lawful firearms security has been demonstrated or accompanies the proposal. This appears to be policy in a vacuum. If lawful security is an issue it would be appropriate to table the data that supports such a contention and have it subject to the scrutiny as</p>

part of the submission process. The philosophy appears to be one of “creating policy on the hoof” and as such is unfair and unreasonable and clearly frustrates informed meaningful consultation and any certainty in decision making.

Relief sought:

Include all information /data that demonstrates that issues are supported by data and linked to appropriate policy. Independent peer review would also be important. Circulate the data as part of the consultation process.

4. Legality.

Modifications to house and home on the scale mentioned to ensure compliance on the restricted categories may impact on Building Act considerations, Local plans, Privacy Act etc. None of these impacts are considered. The costs and limits of the first two (local Council administered) examples are pretty obvious but given alterations, engineering, building and planning approvals how do the Proposals deal with essentially very private firearm security information largely becoming public property?

Relief sought

Develop policy that insures Police vetting of all contractors and that guarantees security of Secure Storage information by all those involved in the processes. Carry out an analysis of the effects of the proposals on other related legislation or regulation at both national and local level – circulate and seek comment on the same.

5. Omissions.

The following issues do not appear to be addressed:

High capacity magazines can be bought and sold legally by non-licenced and non-endorsed licence holders legally. This is madness - please stop it with some good policy/regulation. These magazines should only be possessed or traded between those or have the appropriate endorsement and no other.

Licensing itself for new licence holders should require demonstration of practical competence with a firearm or proof of membership and participation in Police recognised shooting club(s) for some months prior to theory testing. If we can do it for car licensing why not firearms?



40	<p>I'd like to read the file properly and think about it before I reply, But you have not given me enough time to do so. So my feedback is negative, based on your previous track record.</p> <p>I hope you prove me wrong.</p> <p>Thanks for the brief opportunity to submit an opinion.</p>
41	<p>Overall I am not impressed with the lack of timely consultation and poor quality document provided.</p> <p><i>Racks and wooden cabinets</i></p> <p>The November draft says that racks (even those that secure the firearm with a lock, rather than just a cable cannot be used for other than shotguns and bolt action rifles. As no limitations have been placed on shotguns, I assume that single or double barrel break action, semi auto, pump or lever action guns can be stored in racks.</p> <p>Where is the supporting evidence that single or double barrel break action, semi auto, pump or lever action rifles pose such an increased risk of theft against bolt action rifles? I note that there is no requirement stated to disable the firearm in the rack (e.g. by removing the bolt), nor is it in fact always possible to do so. Given any OIA request to the police on for example, firearms in crime, lost fire arms, etc. seems to come back with "that information is not recorded" I assume there is no supporting evidence. If this is not the case, can you please provide it?</p> <p>Where is this supported in the Arms Act, given that "A" category legislation make no differentiation in law on action types?</p> <p>The effect of this requirement is that every owner of anything other than a bolt action rifle or shotgun will need a safe. This is not always possible, such as in rental accommodation where space is not available, and/or are wall and floor fastenings allowed, and the floor may not be able to take the concentrated floor loadings yet a rack may be allowed especially if it is in a roof space or rear of a cupboard.</p> <p>Similarly, a mobile home used for accommodation in a single location is legally a building and not a vehicle and similar comments apply and guidance on this should be provided. For further details on mobile homes and building definitions, I refer you to the MBIE website where there have been a number of Determinations on this issue of what is a building in law.</p>

What does “locks and hinges should be located no more than 300mm from the edge of the door and the longer sides and no more than 600mm spacing between locks and hinges” mean? I suggest a sketch would be useful showing the key dimensions and thickness.

For a rack or wooden cabinet, the door leading to the room is to be of “solid construction with a strong locking mechanism”. Isn’t this the same requirement as a strong room, which calls for a 40mm solid door? What is “solid construction” and a “strong locking mechanism”? Are windows allowed in the room, since in that case, access is only 1 brick through the glass away? How practical is this requirement, given the limitations of rentals as above, or even owner houses where the gun rack or cabinet may be in e.g. a bedroom cupboard. Are you expecting the solid core bedroom door to be kept locked at all times with the strong locking mechanism?

It is impossible to comment on a draft that is incomplete. In the section on wooden cabinets, paragraph first line is incomplete, stating “as applied by.” – applied by what?

Similarly, how thick is “X MM”? The section on cabinets refers to the hinges being a minimum of 3mm steel but makes no comment on the remainder. It is common that hinges are made from solid bar as the pin and pipe as the socket or barrel. Standard water pipe (light and medium wall) is less than 3mm. 15 and 20mmNB light wall pipe is 2 and 2.3mm and medium wall is 2.6mm. Correctly welded to the door, the failure point will not be the pipe hinge barrel tearing.

Is the intent that this is 6mm in all cases – it appears so from the draft, and the Police website which states “Steel boxes or steel cabinets shall be capable of withstanding reasonable physical attack with hand held tools and weapons, and equivalent to 6 mm mild steel strength”. Police drawing C2191 provides an exemplar of a secure cabinet. Is the intent that this is to apply to A category cabinets as well including metal thickness and construction in all respects?

What will be the status of this document and the rifle rack (sheet not named) on the last page of C2191? Will this, or an updated and legible version, be considered to be “deemed to comply”?

The draft refers to BS7558 as the only means of compliance for a cabinet. As this is a commercial standard, it is not freely available to the public. It costs 98 pounds (48 if you are a BSI member) (<https://shop.bsigroup.com/ProductDetail/?pid=000000000000264031>) or around \$NZ200. How are manufacturers or owners making their own safe supposed to have their safe tested to this standard? How much is the cost? Who can do the testing in NZ and what is the testing cost?

	<p>I have been involved in testing building products for a number of years, and the costs are significant. Even a letter of opinion, based on tests from another accredited laboratory is over \$5000. A full scale test can be tens of thousands.</p> <p>I also note this standard calls for a destructive test of 2 identical cabinets by an independent test laboratory – a bit of a problem for a local manufacturer or owner who only wants to make 1 cabinet of stout construction (using good trade practice) as per the Arms Act.</p> <p>The Arms Act calls for the cabinet to be of stout construction. While BS7558 may be one way of demonstrating this, it is not the only way. Requiring all safes to meet BS7558, which will require testing to prove, is beyond the Arms Act.</p> <p>In addition, where do other standards such as from Europe or US based (e.g. California DOJ Approved) fit into the requirements. Is the intention that any safe or cabinet imported is tested to BS7558 at some expense if it has not been done already, including 2 destroyed samples? An example is the common use of ATM safes or bank safes as pistol safes. These greatly exceed the BCE category requirements for wall thickness but would not have a test certificate.</p> <p>I suggest that the Police conduct a proper, detailed and publicised public consultation after getting legal advice on what they can and cannot do without acting in an ultra viries manner which will then be subject to being deemed unlawful under judicial review. Given the Police have lost in these cases to date such as the “pistol grips” policy case in 2009, I am sure they are aware of the implications of making up the law in this respect. Relying on the public not being able to afford the legal costs to fight made up law, or incurring large costs due to an opinion is not good policing and does not promote the public support the police need.</p>
42	<p>I would like to thank the average Officer who “busts a gut” every day and displeasure at reading the draft recommendations for security.</p> <p>Firstly, differentiating between A category semi-automatics and any other sporting firearm is ludicrous at the least. Is my Ruger 10/22 somehow now deadlier than my bolt action 7mm Rem mag? The answer is NO!</p> <p>Also stated that bolt actions and shotguns are ok is wood cabinets are fine but semi’s need a steel box, no mention of pump action, lever action, muzzle loaders etc., all of which are common in NZ. To be honest we (legal and lawful owners) are starting to feel much victimised by stupid recommendations and policies presented by the police. You are there to uphold the law and</p>

	<p>protect the innocent but at present I feel we are being the scapegoat for criminal activity involving firearms most of which are committed by unlicensed owners with illegal firearms.</p> <p>None of us want our firearms stolen, I for one have had a safe built and while not suitable for endorsed firearms would be an absolute nightmare to break into even if a criminal managed to get into the house and passed the security system. It seems the police now wants to play judge, jury and executioner which annoys me greatly. But yet every time a criminal offence occurs with a firearm and it goes to court the sentences are pathetic. If you want to stop criminal use of firearms then penalties must be increased and enforced. And that is how you will get gun crime lower.</p>
43	<p>I believe that the current wording of the Firearms Act is adequate for the storage of firearms. Therefore there does not need to be any more amendments to the Firearms Act or any regulations.</p> <p>I believe that the Police and Government should be concentrating increasing penalties for anybody using a firearm in a violent criminal act.</p>
44	<p>First of all, I welcome the clarification around firearms storage. This has been a topic that does need addressing as there are too many variations in interpretation and enforcement where the law is concerned. And increasing firearm storage and security is something that we all need to consider. However, as you will read, these drafts have raised more questions than answers and one has to wonder at the motives and knowledge of those tasked with writing it and setting the dates.</p> <p>It took me some time to locate these drafts as it has been poorly advertised and this gives me the impression that this consultation appears to be disingenuous, or at the very least, not in good faith. It was only discovered by my wife as she studies for her own firearms license. Ironically on the Police web page where I found these drafts I also found these statements</p> <p>“Police's commitment to strengthening communication with the firearms community”</p> <p>“In keeping with the Government's recommendations, we acknowledge we need to be more responsive in consulting with the Firearms Community Forum and the wider firearms community. “</p> <p>The way these drafts have been processed seem to contradict the Police's own policy.</p> <p>I work within the firearms industry (retail) and even my bosses had not heard of these drafts. (They have now) And they OWN a firearms import / retail business. The Police have not even gone as far as notifying Gunsmiths or those with dealer endorsements to let their customers know. The awareness of this draft consultation has only come about due to the notification from (very) concerned parties advising the firearms community through social media on or around the middle</p>

of November 2017. Because there is no date (only a month) posted on the Police website advising of the consultation, it is almost impossible to determine how long the April and November draft documents have been made available for the public to review and comment on. With a closing date given by Police of 1 Dec 17, it means there is less than two weeks at most for the affected parties to consider the drafts, investigate the differences between two draft policies and compare them to current legal requirements. This limited time frame seems to be a deliberate attempt to stop people seeking legal advice on any impacts for the individuals or the law abiding firearms community, let alone give time to respond accordingly. What's more, the date given for publishing the final draft of the policy is specified on the Police website as being mid-December 2017. This shows there is a deliberate attempt by Police that they wish to finalize draft documentation within two weeks of having closed off objections from the public and firearms community. I cannot believe there is any genuine intent to even consider submissions in good faith, discuss concerns with the community, and consider amendments or alternatives to any areas of policy. It certainly appears to most people that I have discussed this with that the Police have done this to avoid any objections even being made. It appears to be a subversive attempt to sneak through legal changes without proper consultation or allowing those affected to comment.

In summary, I believe the consideration time available to the public, and the current expected finalization date of this policy are wildly unreasonable and do not put the Police in a good light. It paints them as a deceptive underhanded attempt to undermine New Zealand's legal framework. We are expected to trust our Police, and with actions like this, they have shown a lack of good faith if genuine consultation and a fair and reasonable policy is to be formed. I ask that the NZ Police extend time frames considerably and to demonstrate that they can show some good faith and genuine to allow for a proper analysis and consultation with the community.

The wording in the first pages of the document (1:1) states that the "Document is a guide to assist the licence holder". With this in mind, it is to be expected that the draft proposes security requirement suggestions, but does not specify any mandatory requirements described in law. If these guidelines are to be a legal requirement that could affect acceptance or declination for a License applicant or holder, then any relevant legislation should be referenced in order to give the policy veracity. Otherwise the policy will be a collection of security "opinions" with no basis or strength in law.

The Police are required to enforce the law and approve of security measures that comply with the law. It appears that these drafts are allowing the Police to decide themselves whether the law is correct or not. That is the task assigned to the courts, and the judiciary, not the Police.

Quote:

"Although the total security of the residence will be considered, racks will only be considered for approval in the following circumstances:

- 1: Used only for shotguns and bolt action rifles.
- 2: Not being used for the secure storage of centre-fire or rim-fire semi-automatic rifles.
- 3: When they are bolted to a solid floor and in a concealed location, such as a wardrobe which has a solid door with a strong locking mechanism.
- 4: When they are bolted to a reinforced roof strut or supporting beam in the roof cavity.
- 5: They are able to withstand violent pushing and tugging and not wobble, become loose or welded points becoming fatigued."

My first point here is the restriction for Bolt action centre fire rifles or Shotguns. No Semi Autos even if they are still classified as A category. Any consideration to Lever actions? Falling Block? What about firearm models that come in both rifle and shotgun calibres? I can lock a 12 gauge in but not the 308 even though it is actually the same firearm? This was clearly written by someone who has little understanding of firearms, or intentionally by someone who has an ulterior motive to separate A category firearms into separate restricted categories NOT CURRENTLY DEFINED IN LAW. There is no legal reason for the Police to apply such restrictions. The Police are not tasked with writing the law. They are tasked with enforcing the law that has been written. The law does not separate A Category firearms into sub-groups, nor does it state where in a property weapons racks can or cannot not be fitted. As long as the owner complies with the LAW, then the Police do not have the authority to alter this as they see fit. Please remove all Police-applied limitations to the installation of weapon racks in this draft policy.

My second point is; if this security is suitable for a semi-automatic shotgun then surely it is suitable for a semi-automatic rimfire. And a Semi auto centre fire is in need of as much security as a bolt action. Or a Lever rifle. Or a Martini action, pump action or one of the many other types of A category actions. This A category is a standard sporting firearm category and if the security is suitable for one, the surely it is suitable for all. Or does this law mean that I don't have to lock up the lever guns. Only bolt actions or semi autos? That is an example of how poorly written this draft is simply because of a lack of practical firearms knowledge by the author. This could have been

avoided with input from actual firearm owners. (I would NEVER consider not locking up any of my firearms regardless of the action type.)

The Police want to define "stout" as being able to withstand an attack by hand tools (not power tools) for at least ten minutes." That is not a legal definition of "Stout" Why 10 minutes? And what is their definition of a hand tool? A sledge hammer is a hand tool, a gas torch is a hand tool. A hydraulic jack is a hand tool. The older style of hydraulic "jaws of life" are a hand tool that is designed to access cars. Technically a cordless sabre saw could be considered a hand tool. All of these in the hands of a criminal will access even an e-cat or B Cat safe in under ten minutes. You can do this with a hand drill if you know what you are doing. (Ask any lock smith) I would suggest a more structural and measurable definition of stout. Will a Police officer attempt to test security with his choice of hand tool to see if it complies? Or will they guess? This 10 minute definition of stout should be replaced by a measurable definition. Please remove the definition of Stout as being resistant to a 10 minute attack as it has not definable effect on whether firearms will be accessed by a thief or not.

#### Quote

Although the total security of the residence will be considered, wooden cabinets will only be considered for approval in the following circumstances:

- 1: Only being used for shotguns and bolt action rifles.
- 2: Not being used for of centre-fire or rim-fire semi-automatic rifles.
- 3: When they are bolted to a solid floor and wall studs/dwangs and in a concealed location within the residence with the door leading to the room that they are of solid construction, with a strong locking mechanism.
- 4: When they are bolted to a reinforced roof strut or supporting beam in the roof cavity.
- 5: When they are able to withstand violent pushing and togging and not wobble or become loose.

The points raise with the racks above also stands here as well regarding the separation of the Bolt actions from the Semi-automatics. Again no mention of any requirement to lock up Lever, pump, single shot or other actions not mentioned. And there is no legal reason to separate these hen they are all A category sporting firearms. As long as the owner complies with the LAW, then the Police do not have the authority to alter this as they see fit. Please remove all Police-applied limitations to the installation of weapon racks in this draft policy.

	<p>The policy mentions transition dates to cease the use of racks and wooden storage for non-endorsed and semi-automatic weapons. This is not in accordance with the Act or Regulations which by law permits the storage of firearms in such arrangements. Is this another example of Police writing their own laws? Please remove these references.</p> <p>I can see other issues with this document and some which have an apparent disregard for the very laws they (The police) are required to uphold. This draft is not in any way fit for processing and needs a lot of work to be done by people who actually know about the topic. I see this as a direct contradiction from the Police to target criminals and to not burden or punish law abiding firearms owners. This is seen as an underhanded attempt by Police policy makers to subversively enforce their misguided political goals without following the legal protocols they are required by law to uphold.</p> <p>I would finally suggest that if they have such a wilful disregard for the laws that they are tasked to uphold, then perhaps they should reconsider whether they are suitable to hold a position within an organization that is required to uphold these values and enforce our laws.</p> <p>As I mentioned at the beginning, these drafts have the potential to make a difference. Clearly they are still drafts and are not yet suitable for applying into policy yet. They have a number of gaps, inaccuracies and legal issues that need to be addressed. I can see them, and I am not a legal expert so I would suggest that considerable more consultation is yet required before these will be ready. But I look forward to a constructive process that will not punish those of us who make every endeavour obey the law and will actually target the shortcomings of those who desire to break it.</p> <p>As a final addendum, I have emailed this to both published addresses (email) for responses. It appears that here may have been an incorrect email published on the police site for responses. I would ask for a response that acknowledges receipt of this email please.</p>
43	<p>The draft includes elements for further development; such as the transition of storage for non-endorsed firearms where users will be encouraged to improve the storage of firearms, with a second time period for improved storage to become mandatory. While encouragement is a positive step, the draft appears to go a step too far in that it states "The Police will consider the retained use of racks and wooden cabinets but will emphasize the use of steel boxes, cabinets and safes." This wording implies that the Police can decide, outside the legal requirements, whether an individual may use racks and wooden cabinets. Unless the legislated requirements</p>



	<p>are changed it is not be up to the Police to "consider", but only whether the racks and wooden cabinets meet the legal requirements.</p> <p>As to the second transition component which states; "From DATE the Police will require that all not-endorsed firearms to be stored in steel cabinets and safes that should meet the British standard for gun cabinets (BS7558). The current recommended steel storage box, cabinet and safe specifications that meet the requirements of Regulations 19 and 28, Arms Regulation 1992 meet the British standard, with the addition of the following: That the steel is a minimum Xmm thick; and With either all seams continuously welded or that the cabinet body is formed by bend construction." This is an unnecessary over-reach in storage requirements, and appears to be an attempt to unnecessarily bring not-endorsed firearms into the same storage requirements as endorsed firearms. Given the nature of the firearms this would apply to I think this is not required and the existing rack and wooden cabinet requirements should remain.</p> <p>The paragraph regarding the Endorsed Firearms Security Checklist states; "The Police consider that there are two requirements involved in Regulation 28 of the Arms Regulations (1992), for securing endorsed firearms (category B, C &amp; E): a strong room or a room of stout and secure construction, and steel safe, box or cabinet." This paragraph erroneously implies that for the storage of endorsed firearms that both a strong room and a room of stout and secure construction AND a steel safe, box or cabinet. Regulation 28 specifically states that legally acceptable storage is; a steel and concrete strong room OR a room of stout and secure construction capable of being adequately secured against unlawful entry OR a steel safe or steel box or steel cabinet. This could be perceived as an attempt to create a regulation, and consequent compliance by firearms licence holders that is not legislatively required. As such the paragraph should be re-drafted to clearly reflect the actual storage requirements. Furthermore if the intention is to attempt to change the legislation so that both a room and safe becomes the requirement; this would be excessive, unnecessary and impractical. Such a change would place a burden on legitimate firearms users that would outweigh any perceived benefit, and likely incur a higher compliance/auditing costs for the Police; furthermore, as with many changes to firearms legislation regarding licencing and legitimate users, this would likely have no significant effect on illegal users.</p>
46	<ul style="list-style-type: none"> <li>• What happens if the security the licenced firearms holders is up to standard and that they refuse to sign?</li> <li>• Why would we be asked to sign? Is this something that will be mailed out to us or is it only for new licence or renewal...how is it actually meant to be implemented? The text at the start of the document presents the policy as "guidelines. Can it be understood that the</li> </ul>

policy proposes security requirements, but does not specify a mandatory requirement to comply under any legislative onus. If these guidelines are to be legally binding for a licensee, the governing legislation should be cited in order to legitimise the policy, otherwise the policy will remain a collection of security "options".

- Which draft is actually being proposed? The differences are often subtle, although some not so subtle, and therefore providing two drafts could be easily interpreted as disingenuous in intent.
- There is a confusing mix of copies of legislation, copies of regulation, purported Police "policy" that appears to a greater or lesser degree to be outside of the mandate of legislation and regulation, and advice. I hazard that it is intentionally unclear as to where the lines between these are drawn.
- The legal basis for any Police "policy" (intended to have legal effect and be enforceable) generally is only legislation and regulation, and the situation is no different in respect of requirements for firearms security or any other firearms matter. The relevant legislation and/or regulation should be presented up-front, as they are the only instruments that provide Police with a mandate to make "policy" with any legal right of enforcement.
- Police "policy" imposes on licenced firearms owners, therefore, can only be made under a specific, and relevant, provision in legislation or regulation.
- Each policy statement must at a minimum:

First - have the references provided quoted in full for the specific legislation or regulation empowering Police to make this specific policy;

Second - if it is at all unclear why the reference legislation or regulation empowers the Police to make "policy", have the Crown legal opinion or court ruling that Police are relying on provided in full;

As an example, if Police "policy" is seeking to increase the security requirements for storage of A category firearms, there would appear to be no provision for this "policy" under either legislation or regulation. The legislation here sets out clearly the requirements and does not have any provision for Police to make further "policy" requirements.

- Finally - the policy itself should be set out.

Advice should be clearly separated out so there is no confusion either for Licenced Firearms owners or the members of Police charged with enforcing lawful Police "policy".

Historically there has been a trusting relationship between Police and Licenced Firearms owners, and as a group Licenced Firearms owners are, again historically, the strongest supporters of Police in the community.

Unfortunately this trust has been greatly eroded over time, and particularly over the last year, to the point where it appears to Licenced Firearms owners that Police are targeting Licenced Firearms owners over criminals. For instance the suggestion that arose during the recent select committee that Police should be able to enter a Licenced Firearms owner's premises without a warrant is onerous and abhorrent. Although Police have sought consultation with the public, this consultation does not appear to be genuine, nor in good faith. The general firearms community has only become aware of this consultation through social media on or around 18 November 2017. As there is no date (only a month) posted on the Police web page advising of the consultation, it is difficult to determine how long the April and November draft documents have been available for review. With a close off date specified by Police of 1 Dec 17, this leaves only 11-12 days at most for the community to consider the documents, analyse the differences between current policy and each of the April and December drafts, seek legal advice on individual or collective community impacts, and respond accordingly.

Further, the timeline for publishing the final version of the policy is specified on the Police website as being mid-December 2017. This explicitly states that there is Police intent to finalise draft documentation within two weeks of having closed off submissions from the public and firearms community. It is difficult to believe there is genuine intent to consider submissions in good faith, discuss concerns with the community, negotiate amendments or investigate alternatives to any areas of policy concern therein. In summary, both the consideration time available to the public, and the proposed finalisation date of this policy are unreasonable and not in good faith if genuine consultation and a quality, equitable policy is to be formulated. I request that NZ Police extend both milestones in order to demonstrate good faith and genuine consultation with the community, along with clarification of which draft and a rectification that this is to be deemed as guidelines and not enforceable.

The suggestions proposed on this topic should be viewed in a broader context of the urgent need for Police to regain the trust of Licenced Firearms owner through a truly open and consultative approach by Police in the knowledge that we are governed by our legislation and regulation. There is no waiver for this principle in any area of Police operation.

47	<p>From a purely practical perspective none of the proposed changes will do anything to prevent the theft of firearms by a determined thief. Even an e-cat safe can be compromised by commonly available power tools without much effort.</p> <p>It should also be noted that the police do not have the power to write the law. Firearm security is defined in the Arms Regulations which can be changed only by an order in council. Focusing on enforcing the law and trying to improve burglary clearance rates would do more to reduce the flow of firearms to the criminal community than window dressing around firearm security.</p> <p>Additionally, where is the proof that current security standards are not sufficient? How many burglaries have been investigated where the storage that is currently defined in the Arms Regulations have been found to be insufficient against a casual theft?</p> <p>I would also like to know if the Police will lead by example and improve the security of the lockers in their patrol cars to the standards that are being proposed. Why is it ok for e-cat firearms to be left in a thin steel box in an unattended patrol car, when civilian owners are required to have a 6mm steel safe and under no circumstances are permitted to leave unattended firearms in a vehicle?</p> <p>This is nothing more than an attempt to increase the costs of storage as a deterrent to owning firearms, it is unlawful as the Police do not have the power to write the Arms Regulations and it will make no practical difference in preventing theft of firearms.</p>
46	<p>Over the last few years storage of firearms has been altered to the stage where i believe it is at a situation where it is satisfactory and is perfect for all normal people, criminals are a different kettle of fish. I imagine the proposed change is to try and prevent firearms getting into their hands. If you keep making it harder and harder on normal firearm owners in the end they just won't comply, something the police would not want to happen. If you lose the support of the general firearm public you will have a very hard job implementing any future changes for firearm owners. The police have everything in their hands to deal with the problem of firearms getting into the wrong hands, which is what this all about i presume, get judges to impose decent penalties on anybody who is in procession of a firearm illegally. Don't keep making it difficult for the majority of firearm owners.</p>
47	<p>I have been advised that the police are proposing to amend the Firearms legislation, with regard to security of forearm storage, in a way that I deem to be excessive. I wish to register my protest against this proposal.</p>

48	<p>I am a serving Police Officer and also a FAL holder with an endorsement. The A-Cat changes don't worry me at all, however I think separating Semi-Automatics is too complicated and not needed.</p> <p>This part worries me:</p> <p>"Endorsed Firearms Security Checklist The Police consider that there are two requirements involved in Regulation 28 of the Arms Regulations (1992), for securing endorsed firearms (category B, C &amp; E): a strong room or a room of stout and secure construction, and steel safe, box or cabinet."</p> <p>This is completely wrong and you will lose any battle in court with it, it goes against the Police core value of Integrity as it is just plain dishonest and I'm embarrassed reading this in a Police document.</p>
49	<p><b>General comment</b></p> <p>In general the thrust and detail of the document is supported where it applies to Not Endorsed Firearms.</p> <p><b>Specific comment</b> –ref Rack Specifications</p> <p>There is real concern at the segregation of commonly used sporting firearms into two categories viz semi- automatic and manually operated. The purpose of this segregation is confusing (and disturbing) when semi- automatic shotguns are not included with semi-automatic rifles. The perceived intention of the segregation is to treat the semi-automatic rifle as a firearm that is inherently dangerous and approaching the status of a MSSA.</p> <p>Whether intended or not the segregation cannot be justified and its inclusion in this document will fuel the commonly held belief that police are inclined to interpret the law as they would wish rather than as it is written.</p> <p>NZDA recommends that all non-endorsed firearms are categorized the same as the current legislation is written.</p>
50	<ol style="list-style-type: none"> <li>1. I support more secure storage of firearms generally.</li> <li>2. I support having a consistent policy re storage of firearms for the whole country.</li> <li>3. My main area of concern is the intention of the NZ Police to make racks illegal for storage of A category centre-fire or rim-fire semi-automatic rifles. Given that the racks must be robust and secure, (and in some cases improved), I have three issues.</li> </ol>

	<p>There is not, to my knowledge any evidence of these particular firearms being targeted by criminals stealing them from licensed owners and therefore no particular reason for the Police to make this requirement. If there isn't a problem, why do this? It will only antagonise law abiding firearms owners and have nil effect on criminals.</p> <p>This would require firearms owners who own the above firearms to require expensive new storage - it may mean also that instead they choose to hide the firearms rather than pay that extra cost, an action that would negate the very purpose of good storage.</p> <p>It is not a requirement under the current Arms Act.</p>
51	<p>Firstly in both versions you are trying to re-classify A-Category Semi-Automatic Firearms by way of separate security requirements compared to other A-Category Firearms. This contravenes the Law. Also in both versions you require Firearms Owners to sign a contract whereby you threaten revocation of the Firearms License and/or any endorsements if it is not signed.</p> <p>"I acknowledge receipt from the New Zealand Police of a copy of "SECURITY CONDITIONS AND REQUIREMENTS FOR FIREARMS LICENCES AND ENDORSEMENTS" (Police Form POL67N). I understand that the Police may revoke the licence or endorsement(s) if I fail to observe any of the conditions imposed by the Arms Act 1983, the Arms Regulations 1992 and the "NEW ZEALAND POLICE AS SET OUT IN THE DOCUMENT"</p> <p>This is absolutely outrageous when you consider that the highlighted part of the quoted text is Police Policy not Law. In short this is an Ultra Vires practice where Police are overstepping their mandate as enforcers of the Law not the makers of the Law. Also this then when signed will apply to any future Policy changes by Police. And it has to be asked will an applicant's security not be approved if the said receipt/contract is not signed. In short Police are attempting to implement policy that has no legal standing. Being forced to sign this policy would remove our rights under the Arms Act. We saw Police attempt this earlier this year with the 2017 Arms Code.</p> <p>There are issues with both proposals because any Police policies and practices must be consistent with the Law; neither proposal is.</p> <p>Regulations 19 and 28 of the Arms Regulations 1992 sets out the conditions relating to security precautions. The legal authority for the promulgation of the regulation is s 74(1) (j) of the Arms Act 1983. The authority to prescribe security precautions for firearms is vested in the Governor General;</p>

not the Police. Therefore Police may not insist on security precautions that are not prescribed by Regulations made by order in council in congruence with s 74(1) (j). Regulation 28 is partially ultra vires because the Governor General has ostensibly delegated anon-delegable power by making security precautions subject to police approval. This delegation is not authorised by the empowering Act. Therefore the ostensible police veto is not enforceable because it is unlawful (see *Hawkes Bay Raw Milk Producers Co-op Ltd v NZ Milk Board* [1961] NZLR 218 (CA).).

If the Police believe that the present security requirements set out in the Arms Regulations are inadequate, the response ought to be directed at changing the law rather than the Police policies and practices. Trying to foist unauthorised (and therefore unlawful) Police policies on civilian gun owners and enforcing them by unauthorised practices bypasses the parliamentary process and oversight of the legislature; that is unacceptable in a free and democratic society such as New Zealand and as previously discussed, doomed to the same judicial rejection as the police pistol grip policy in 2009.

#### Observations from Joe Green

I have been through the November amendments to security standards proposed by Police and made comment.

I support clarifying the standards by example in terms of Regulation 19, however do not support places where police seem to attempt to rewrite the regulation, including redefining 'firearm' into sub categories.

If Police wished to have the ability to do that they should seek an amendment to the regulation giving the same authority to approve security as found in regulation 28.

In terms of safety - regulation 19 intentionally provides a broad scope for securing firearms - in order to ensure compliance and enhance public safety. Indicators from non-intentional death and injury suggest that the security requirements are actually working, and in terms of intentional deaths, particularly suicide it also appears to be working - this is backed by research by Dr Annette Beautrais of the Canterbury Suicide project. I would be very interested to see the basis for the proposed changes. One leg would be research into theft of firearms, and the storage of those firearms at the time of the theft. That would be one indicator of any shortfall in security.

	<p>I am mindful that some firearms thefts have been from storage way and above any set by regulation.</p> <p>My notes for suggested changes to the regulations include regulation 29. I think that this power of inspection needs to be extended to all firearms. In the draft I question the ability of a contractor to exercise this power of entry and inspection. The power is specific to a member of Police.</p> <p>I would not support contractors being given this power.</p>
52	Does not support the changes. No consultation with FCAF before circulated to public.
53	<ul style="list-style-type: none"> <li>• To redefine the issue in this way without the formal change in legislation via an Order in Council invites a lot of potential litigation and inconvenience for all concerned.</li> <li>• Are you actually trying to make firearms in the hands of law abiding licensed owners more secure (it would seem not given the inherent vulnerability of the various storage media to modern tools</li> </ul> <p>I think that the requirement for steel cabinets for semi-auto rimfire rifles is excessive. There are many folk with just a bolt action hunting rifle, a shotgun of some sort and a little Ruger 10-22. To have to house that little rimfire almost the same as a centrefire MSSA is a bit over the top. I am assuming that an "A" category centrefire self-loader with a capacity of under 8 rounds will require steel storage, but of a lesser level than higher capacity arms.</p> <p>It would seem that you creating a new category of firearm by stealth.</p> <ul style="list-style-type: none"> <li>• 2. The requirement for 16mm ply is, over the top as no alternatives are given. What are the proposed standards for solid timber, or for that matter MDF? Where the ability of thieves to open a cabinet is concerned, steel of any thickness is very vulnerable to an angle grinder with cutting wheels.</li> <li>• What are the approximate dates for proposed implementation too, so that changes, if any, can be made (and saved for!) in a timely manner. If the changes proposed are as suggested, a timely release of implementation dates would be of great help.</li> <li>• A point not directly related to security, but nevertheless important to MSSA owners, is the defence for possession while under supervision of a properly licenced person. This defence is in the Act for every sort of firearm except an MSSA, where the defence seems to have been omitted. MSSAs means that even a prospective purchaser of an MSSA with an "E" licence cannot even hold it without a Permit to Procure. Given that the defence in the Act applies to all</li> </ul>



	<p>other firearms, I think that this obvious anomaly should be eliminated to put MSSAs in line with pistols and other firearms.</p> <ul style="list-style-type: none"> <li>As far as I know this prohibition on the handling of MSSAs by other than the person to whom it is registered is not usually strictly policed.</li> </ul>
54	<p>I understand that sweeping alterations to the storage of A category firearms are being proposed contrary to the current acts relating to these. If criminals want guns they will get them no matter how secure the storage most likely by threats of force to the key holders families. It seems there is an anti-gun push by some misguided members of the NZ police which will naturally be resented by lawful gun owners who feel they are being scapegoats to some political ends, making some official look good because he can say "I've done something knowing well that more restriction on the law abiding and by definition none problem. Will not resolve the problem criminals but only further annoy the law abiding. Who will resent being once again penalised for no good reason. Since by definition no criminal will abide by any laws dreamed up. I know most shooters have good relations with the police despite the recent game of 'musical firearms officers' who seem to get a job they might not understand and if they do learn the ropes are then sent onto some other aspect of policing. Rather than having a known and therefore respected long term civilian who actually knows his subject and the people involved. So I'd respectfully advise let well enough alone.</p>
55	<p>I am feeling continually persecuted by the Police, while trying to enjoy my lawful ownership of firearms. This offends me!</p> <p>Am I a second class citizen in this country? I am not a criminal.</p> <p>The proposed changes will have the effect of adding cost and inconvenience to firearm ownership, so only the wealthy few can afford them.</p> <p>We as a country pride ourselves on a model of rugged outdoor activities, do you want to see in the future the young people playing Minecraft on a computer instead of engaging in healthy outdoor activities. This is what you are promoting.</p> <p>The current regulations are very good and are sensible I don't support any of the changes proposed in the November draft document.</p> <p>I feel the police do not enforce the current rules adequately in relation to criminals and their offending. So should focus on them not the firearms Licence holders.</p>

	<p>The changes to security will not stop theft, as the police seem unable to stop thefts from their own police station as happened in the North island recently.</p>
56	<p>I am a FAL holder (A-cat) and mainly enjoy target shooting. I own only bolt-action rifles and keep these in a safe so proposed changes in the draft document leave me with no personal axe to grind, apart from a shared interest in public safety.</p> <p>It is my view that a secure storage policy should be simple, explicit and effective, to both prevent child and criminal access to working firearms, which also means that it should not impose ineffective burdens on firearms owners.</p> <p>That said, once someone has been identified in advance by a motivated thief as a firearms owner, there is a substantial risk that any reasonable level of security will be defeated. Meaningful security against targeted gun theft is thus chiefly through obscurity... but rules forcing gun owners to equip homes with security worthy of a drug dealer's pad may invite unwanted attention.</p> <p>Points that I wish to draw your attention to are as follows:</p> <p><b>3.7 Doors of Buildings.</b>  =====</p> <p>Size 12 boots and a walking kick can overcome many a door constructed according to requirements listed. It is a waste of resources to specify strengthening of areas less prone to failure. Better to simplify door requirements. While addressing one weak area of most door assemblies: the superficially anchored lock strike plate. Simply specify that</p> <p><b>"The lock strike plate must be secured with at least two 5mm diameter steel screws of at least 120mm length."</b></p> <p>This cheap, easy and effective increase in security also has the advantage of invisibility. A simple example of it being applied to a domestic dwelling door:</p> <p><a href="https://www.youtube.com/watch?v=r_cp53rVbHQ">Burglar Proof Your Doors - Striker Plate Failure - Kick In Door Burglaries Tip</a>  <a href="https://www.youtube.com/watch?v=r_cp53rVbHQ">https://www.youtube.com/watch?v=r_cp53rVbHQ</a></p> <p>A graphic testing performed by a helpful US Police Department SWAT team:</p> <p><a href="https://www.youtube.com/watch?v=QoYGRexY8FE">Inexpensive and Effective Door Security</a> <a href="https://www.youtube.com/watch?v=QoYGRexY8FE">https://www.youtube.com/watch?v=QoYGRexY8FE</a></p>

### 3.7 Windows of Buildings.

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Steel bars on the face of it seem to increase security, after all, they are used in prisons aren't they? But requiring steel bars on windows can also be counterproductive by forcing firearms owners to invite trouble upon themselves. It will advertise to thieves that something extra is stored behind the bars... and in New Zealand that is most likely restricted firearms! Invisible security is surely desirable in order to avoid targeted firearms theft.

Having windows locked, by key or permanent screws is a useful, practical (and inconspicuous!) defence. Burglars do not like having to pick out all broken glass before pushing their bodies through a hole. Aside from a personal risk of leaving some glass and cutting themselves, it also adds a significant delay which increases discovery risk. Double glazing, now standard in NZ dwellings, makes ingress through a smashed but still unopenable window even less likely as two panes need to get broken resulting in twice the noise and twice as much glass to clear out.

### Rack Specifications (pages 3 and 4)

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**"1. Used only for shotguns and bolt action rifles. 2. Not being used for the secure storage of centrefire or rimfire semiautomatic rifles."**

Two separate implicit issues:

(a) An assumption that racks are LESS secure than a locked sturdy cupboard / safe, which is generally true. That does not necessarily mean that racks are insecure.

(b) The idea that shotguns (presumably including semi-autos and pump actions) and bolt action rifles somehow need less secure storage than semi-auto rifles is, on the face of it, insane. ANY firearm accessed without permission by a child, or possessed by a person not "fit and proper" is unacceptable. It may be insensitive to ask any Police Officer or shop owner who have had a presumed-loaded firearm pointed at them if the firearm type made any difference!

Criminals may possibly have a "wow!" feeling about semi-automatic firearms, but such excitement is irrelevant as it will be felt upon encountering the guns during a burglary, but they are unlikely to

know in advance what they will find (NB comment above re steel bars advertising the presence of restricted firearms). Such criminal preference (if it indeed exists) is a separate issue to the notion of levels of dangerousness of different firearms.

Regarding a higher relative risk from certain firearm types, consider:

- For single murders and mass murders most guns can do, and have done. They must all be stored safely.

- A bullet fired from a full bore centrefire rifle can kill or injure through a thick tree trunk, through a car body, through a brick wall, through most body armour, and from hundreds of metres away. They are potentially dangerous devices and must be stored equally securely irrespective of whether their barrels are attached to a pump- lever- bolt- or semi-automatic action.

- In New Zealand the legal restriction on magazine capacity has rendered A-cat semi-autos on a par with manual repeating rifles in their overall rate of fire. Bolt, pump and lever action repeating rifles and shotguns may have a slower rate of fire than an autoloader, but that does not mean they have "slow" rates of fire! The British Empire was slow to adopt a semi-automatic rifle as it already had a fast bolt action rifle, and thousands of these .303s went into NZ private ownership post-war. There is constantly half a dozen .303s up for sale on TradeMe for \$75 upwards, known as "deer guns". This is the most ubiquitous bolt action rifle in NZ, has terrifying potential and must be stored as securely as A-cat autoloaders.

Dangerousness grading of different A-cat firearms is uninformed fantasy at best, at worst passive aggression, and risks resentment and loss of the respect most firearms owners have for NZ Police. Much better to just come out and declare, "Racks are not good enough!" Some may disagree with such a statement, but at least a rational debate can be had over that one.

**Receipt - Page 13.**

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The way this is worded makes the signatory enter into a civil contract with the NZ Police, rendering police guidance in the document a binding obligation, something which is above and beyond current legislation. If that is the intent, that is improper as NZ Police should not usurp the role of the NZ legislature.

	<p>That said, it is a reasonable practice to request someone to sign for having read a document and to confirm that they have had a chance to ask for clarification about anything not understood.</p> <p><b>On the "separate" keeping of ammunition / essential working parts of guns</b> - several references through document.</p> <p>=====</p> <p>Security can become an imposing financial barrier on prospective participants in the shooting sports, an obvious example being of renters (of whom we have more and more) who may have difficulty getting permission to install higher security safes, etc. Some expensive steps may add little to security, yet other inexpensive steps can add significant gains.</p> <p>One step is DISTANCE. This can be included simply by NZ Police interpreting the <b>"SEPARATE"</b> storage of parts including ammunition, magazines, and bolts to mean <b>"IN A SEPARATE ROOM"</b> in addition to usual storage requirements. So, if a gun safe is in the cellar, bolt and ammunition must then be stored in a suitable storage either in the house or the garage. If a gun safe/rack is in the bedroom, the bolt/ammunition is in the laundry, etc. Such separation would significantly add to public security, at no significant extra cost and with only minor inconvenience to gun owners. Separating working parts between rooms would also implicitly affirm the ethos that firearms ownership is not intended as a means of self-defence.</p>
57	<p>As a busy NZ Police firearms licensing vettor I would like to draw your attention to the following regulation:</p> <p>Arms Regulations 1992: <b>19 Conditions relating to security precautions</b></p> <p>(1) (c) "the holder shall take reasonable steps to ensure that any firearm in the holder's possession is secured against theft"</p> <p>This is errant law and should be amended as there is no legal requirement for a person to have any firearm security at their place of residence if they don't possess a firearm or have a firearm in their possession. Example: security check for a change of address for a firearms licence holder or renewal of a firearms licence. The holder states that as he/she doesn't own any firearms or have any firearms in his/her possession, no firearm security is required by law. This situation could also extend to new applicants as well, although unlikely.</p> <p>The Arms Regulations should state clearly that specified firearm security is required by all firearms</p>

	<p>licence holders and that such security must be at their place of residence. Please take the above into serious consideration.</p>
58	<p>Re: Nov 2017 Draft</p> <p>It is of concern that there appears to be an intent to differentiate A Cat semi-automatic firearm storage requirements. It seems that there is an inference that A Cat semi auto rim fire/centre fire/shotguns are to be classed as their own category for storage requirements.</p> <p>I agree with the intent that a standard should be specified for safes; this should give assurance to owners that if a safe is built (and certified by the manufacturer) to the standard, it will meet storage requirements if it is installed in the appropriate manner.</p>
59	<p>I respectfully ask for the reasoning behind the need for any changes to the current firearms legislation.</p> <p>I understand that extra security measures are being considered, for which I ask the following questions.</p> <p>1/ Is there substantiated evidence here in NZ that proves a requirement for change to the existing legislation?</p> <p>2/ Who is asking for change and why?</p> <p>3/ Will a change in legal ownership requirements impact on the illegal use of firearms population here in NZ?</p> <p>4/ Is there an intention to be seen to reduce the existing firearms population here in NZ, or purely to appease the anti-gun lobby? (I beg your pardon) To make the general population feel safer.</p> <p>There is always resistance to change, but everything evolves over time and there may be improvements which should be made. But consultation and reasoned decision making must be followed, or the effects on freedom of choice and responsibility of the individual will be gradually eroded.</p> <p>Another consideration is that if one step leads to another? Then what will be the cost of implication to the tax payer and for what level of benefit?</p> <p>I suppose the real question is - Is there a real need for change for improvement, or is this just another tag on more restriction job for the boys?</p> <p>If you (Sirs) can disprove the latter, then I am with you!</p>

60	<p>My submission to the police on their safe storage BS:</p> <p>"That rifle hanging on the wall of the working-class flat or labourer's cottage is the symbol of democracy. It is our job to see that it stays there." George Orwell.</p>
61	<p>I have read the two draft document and I am unsure why there are two to review and which one is proposed?</p> <p>I am concerned that the police are looking to impose restrictions that are not be written in to legislation. This has happened before and has been confusing with the police changing their view without any changes in the written legislation.</p> <p>The document continues this by suggesting that different A category firearms require different storage requirements when the law states that A category firearms have a standard requirement. There is no separation between the requirements of an A category bolt action .22lr and a semiautomatic .22LR.</p> <p>If there is no change in legislation to support this then the police should have no way to impose this.</p> <p>I am opposed to the change where an applicant must sign under the following condition.</p> <p>'I understand that the Police may revoke the licence or endorsement(s) if I fail to observe any of the conditions imposed by the Arms Act 1983, the Arms Regulations 1992 and the New Zealand Police as set out in the document.'</p> <p>The condition that states any conditions set by the police in addition to those in the arms act 1983 or Arms Regulations 1992, which is by law the only documents that the public can be held to.</p> <p>If changes should be made they should be made through parliament and not arbitrarily and unlawfully with the police.</p> <p>I support the Police in most aspects of their activity. I have family in the police and it was a career option for me at one point but as a law abiding firearm owner we seem to be on the wrong end of police policy that cannot seem to justify how greater impositions on lawful firearms owners will make any difference to criminals</p>

62	<p>Although Police have sought consultation with the public, this consultation does not appear to be genuine, nor in good faith. The general firearms community has only become aware of this consultation through social media on or around 18 November 2017. As there is no date (only a month) posted on the Police web page advising of the consultation, it is difficult to determine how long the April and November draft documents have been available for review. With a close off date specified by Police of 1 Dec 17, this leaves only 11-12 days at most for the community to consider the documents, analyse the differences between current policy and each of the April and December drafts, seek legal advice on individual or collective community impacts, and respond accordingly.</p> <p>Further, the timeline for publishing the final version of the policy is specified on the Police website as being mid-December 2017. This explicitly states that there is Police intent to finalise draft documentation within two weeks of having closed off submissions from the public and firearms community. It is difficult to believe there is genuine intent to consider submissions in good faith, discuss concerns with the community, negotiate amendments or investigate alternatives to any areas of policy concern therein.</p> <p>In summary, both the consideration time available to the public, and the proposed finalisation date of this policy are unreasonable and not in good faith if genuine consultation and a quality, equitable policy is to be formulated. I request that NZ Police extend both milestones in order to demonstrate good faith and genuine consultation with the community.</p> <p>Regarding the content and wording of the November 17 draft policy itself, there are many areas of concern I have, both in a more general sense, as well as pertaining to the attempt to codify specific security requirements. I have attempted to capture these points as best as possible, noting the policy formatting is not indexed with paragraph numbers or lettering to allow clear referral to specific aspects of the policy.</p> <p>1- The background text at the start of the document presents the policy as "guidelines". On this basis, it is understood that the policy proposes security requirements, but does not specify a mandatory requirement to comply under any legislative onus. If these guidelines are to be legally binding for a licensee, the governing legislation should be cited in order to legitimise the policy, otherwise the policy will remain a collection of security "options".</p> <p>"The background text at the start of the document specifies ""The New Zealand Police (the Police)</p>
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administers the provisions of the Act and delivers services and enforcement to meet the intent of the Act"

This is not accurate. The Act and its Regulations do not contain the word "intent" anywhere. The use of the word intent implies Police can subjectively apply aspects of legislation. Law is law. Remove "intent" wording and adhere to the police mandate of enforcing law as a police function under the Police Act 2008.

"Where materials, method of construction or locks do not comply with the Police published standards, remedial action is required to comply." There is no requirement for a licensee to comply with any Police standards by law, only the legal requirements specified in the Act and regulations. Who determines what the remedial actions are and what any shortfalls are? The only legal requirement by Police is to determine that a room is of stout construction / strong room / steel box, safe, cabinet etc. as per the Arms Act or Regulations.

"Although the total security of the residence will be considered, racks will only be considered for approval in the following circumstances:

1. Used only for shotguns and bolt action rifles.
2. Not being used for the secure storage of centre-fire or rim-fire semi-automatic rifles.
3. When they are bolted to a solid floor and in a concealed location, such as a wardrobe which has a solid door with a strong locking mechanism.
4. When they are bolted to a reinforced roof strut or supporting beam in the roof cavity.
5. They are able to withstand violent pushing and tugging and not wobble, become loose or welded points becoming fatigued."

There is no legal basis for the Police to apply such limitations and further break down A Category firearms into sub-groups, nor specify where in a residence weapons racks may or may not be installed, so long as they comply with the Act and Regulations.

Remove all Police-applied limitations to the installation of weapon racks in this draft policy.

"Wooden cabinets must meet the standard of "stout" as applied by the".

The definition of Stout or any reference to governing law is missing. Complete the sentence.

"The Police define "stout" as being able to withstand an attack by hand tools (not power tools) for at least ten minutes."

This is not a definition of Stout. Why is 10 minutes proposed as the defining time frame? An oxy torch is a hand tool, a thermic lance is a hand tool. A jack is a hand tool. All of which will defeat even an e-cat safe in under ten minutes.

Remove the definition of Stout as being resistant to a 10 minute attack as it is meaningless and bears no outcome on whether firearms will be taken by a thief or not.

“Although the total security of the residence will be considered, wooden cabinets will only be considered for approval in the following circumstances:

1. Only being used for shotguns and bolt action rifles.
2. Not being used for of centre-fire or rim-fire semi-automatic rifles.
3. When they are bolted to a solid floor and wall studs/dwangs and in a concealed location within the residence with the door leading to the room that they are of solid construction, with a strong locking mechanism
4. When they are bolted to a reinforced roof strut or supporting beam in the roof cavity. 5. When they are able to withstand violent pushing and togging and not wobble or become loose.”

There is no legal basis for the Police to apply such limitations and further break down A Category firearms into sub-groups, nor specify where in a residence weapons racks may or may not be installed, so long as they comply with the Act and Regulations.

Remove all Police-applied limitations to the installation of wooden containers of stout construction in this draft policy.

Regarding Steel safes or containers:

"Fixed to the building on two surfaces with at least 6 mm fasteners and fastened to a rigid surface or support such as concrete, brick or through plaster board to a stud or dwang. Fasteners of 6mm x 75mm long will ensure at least 50mm of thread is engaged in the rigid support. Use heavy gauge 'coach' screws anchored by at least 50mm and a large washer placed under each coach screw head into the framing. If secured into concrete, use similar gauge chemical or expanding bolts. Floor fixing to a wooden floor must be completely through the floor. The bolts will require a stout backing plate or sufficiently large washers to prevent them from being pulled through the floor"

Why should a safe or steel container need to be fixed to two surfaces?

This does not necessarily increase strength of attachments and is not always possible in rented premises, where getting permission to secure to the floor alone can be problematic for those who are not owner-occupiers.

Amend to specify fastening to the floor alone as an acceptable standard of fixing (e.g. four points of attachment to the floor alone rather than say two to the floor and two to the wall.

The policy proposes transition dates to move away from racks and wooden storage for non-endorsed and semi-automatic weapons. This is not in accordance with the Act or Regulations which by law permits the storage of firearms in such arrangements.

Remove any Police-initiated policy restrictions on wooden containers and metal racks. No transition plan is required as a result.

-“That the steel is Xmm thick “

It is impossible to comment on a specification that is yet to be determined. Complete the specification proposal so it may be commented on.

RECEIPT DETACH RECEIPT AND PLACE IN APPLICANTS FILE APPLICANT DETAILS

Surname Forename(s) Preferred name Date of birth // I acknowledge receipt from the New Zealand Police of a copy of "SECURITY CONDITIONS AND REQUIREMENTS FOR FIREARMS LICENCES AND ENDORSEMENTS" (Police Form POL67N). I understand that the Police may revoke the licence or endorsement(s) if I fail to observe any of the conditions imposed by the Arms Act 1983, the Arms Regulations 1992 and the New Zealand Police as set out in the document. I further understand that my security precautions must be inspected and approved by a member of the police before I can receive my firearms licence or possess any firearm, military style semi-automatic firearm, pistol, or restricted weapon. Licence holder's signature Date Witnessed by Licensing Vetting Officer / Police Employee name Signature Designation QID Date There is a receipt for that is attached to the rear of the policy which a licensee is required to sign to acknowledge the policy and the law.

Remove as there is no legal requirement for a licensee to acknowledge police policy or law by signature, only to comply with the law. This appears to be a means to create a legal contract with the licensee, whereby any perceived ‘infringement’ may be used to revoke the licence. This is not a requirement under the current legislation and must be removed.

Police draft document references British Standard 7558, yet they do not provide that document as a reference in this document.

Remove the reference to British Standard and replace with appropriate NZ/Australian Standard, also provide that standard or a link to it for reference.

The manner in which this consultation was advertised to the Firearms Community leads me to think this was a deliberate ploy to ensure no submissions were received. No advertising, no contact with recognised shooting clubs and groups, no open consultation. This is unacceptable in itself , let alone adding in the 10-11 day time frame from the world finding out about this through to the closing date for submissions

	<p>The provision of an incorrect email address for responders also suggests a deliberate desire to stymie fair interaction with all groups who will potentially be affected.</p> <p>If the NZ Police are hoping to increase standing amongst the NZ Firearms Fraternity this is has to be an object lesson in how to fail miserably.</p>
63	<p>Why are the police trying to change the security standards that are already in place for firearms?</p> <p>Perhaps it would be simpler and cheaper for all concerned to have an alarm / camera system in place that automatically calls the owners cell phone so that the owner can contact police if it is an unlawful entry.</p> <p>The police could then take appropriate action and hopefully there is a photo of the perpetrator on camera and on the phone so identification can be made.</p>
64	<p>I've had a chance to look through this document. I know I definitely do not have anything about storage of guns in any of my Rental Property Agreements. (I do allow most of my properties to have pets and mention this in the Agreement). Most Landlords do however have a clause that any changes made to the property must be 'put right' on leaving the property. Therefore, I do not think any landlord will object to safely storing guns in their property, however I do think they should be consulted on where and how this is to be installed. I think most would prefer to just have a gun case put inside a wardrobe or similar place.</p> <p>Just one thing, on the point below it mentions that ammunition should not be kept in the Storage facility but it doesn't mention anywhere (that I can find) how or where it should be kept. This may mean that some people would have to have two separate gun cases/steel boxes/steel safes, also doesn't say if they should be in another room/space or whether they can be right beside each other.</p> <p><b>28 Security precautions in relation to pistols, military style semi-automatic firearms, and restricted weapons</b></p> <p><b>2)</b> Where a pistol, military style semi-automatic firearm, or restricted weapon is kept in a steel box, steel cabinet, or steel safe in accordance with sub clause (1)(c), ammunition for that firearm shall not be kept in that steel box, steel cabinet, or steel safe.</p>
65	<p>I would like to make the following points regarding the current proposal.</p> <p>The attempt to phase out racks and wooden cabinets for A cat firearms by this method is unlawful</p>

	<p>because both are expressly allowed by the Regulations.</p> <p>Likewise for Endorsed firearms the need for a steel safe or cabinet to be to be inside a room of stout construction as implied by this document is contrary to what the current regulations state.</p> <p>The input from Firearms community such as NZDA PNZ SSANZ &amp; the like should provide invaluable insight to the development of sensible policy.</p>
66	<p>Your submission does not address the issues that licenced firearm owners have or address concerns that were raised by the select committee last year, it only makes things more complicated.</p> <p>I already keep my firearms secure, at my parents' home in Carterton, because where I live is not a good area. But with your new rules I would have to go out and buy a safe and bolt it to my landlord's property. Even though there are no firearms here. It's even worse for people with E-category licences who will have to build a strong room in their rented properties.</p> <p>Why do NZ Police so stubbornly attack licenced firearm owners?</p> <p>Maybe instead of making new laws you should enforce the ones you have, here is a short list of examples where NZ Police have failed:</p> <ul style="list-style-type: none"> <li>• David Johns - Slashed tyres in Wellington - Sentenced to 22 months.</li> <li>• John Noel Mabey - Sold guns to gang members, one of the guns he sold was later used to shoot a policeman. - Sentenced to 21 months.</li> <li>• Kelsi Anne Sherriff - Was on home detention, smoked meth and ram raided a shop. She had two firearms in her possession. - Sentenced to 21 months.</li> <li>• Heather Du-Plessis Allen - Used false document to obtain a firearm by deception, filmed everything and admitted doing it. - Not prosecuted.</li> </ul>
67	<p>I am responding to the November 2017 draft document. I see no point in studying the earlier draft, as I assume that all matters of consequence will have been incorporated into the latest document.</p>

1 Background.

a. As the booklet is a guide, there is no way that it can be considered to be an approval in lieu of a security inspection. Finish the 2<sup>nd</sup> sentence after – “security requirements.”

2 Paragraph 3

a. The Police is required to administer the Act and Regulations, as written and approved by Parliament. The police is not required to “interpret” the law, but to enforce it. If the law requires interpretation, parliament is the authority to perform such interpretation as is necessary to ensure consistent application of the law, and to amend any Act or Regulation as necessary to remove the need for any further “interpretation”. The previous Minister of Police became well aware of the hazards and pitfalls in Police “interpreting” the law, and laid down strict conditions for consultation with affected parties. Therefore, the second sentence is redundant.

Checks on the storage of firearms

a. Bullet point 3 – “-- for an endorsement to a licence”.

4 Police employees performing inspections

a. “—or contractor) who will produce a Police-issued identity card.”

5 Assessment of secure storage

a. Bullet point 2 “Prevent the theft of any firearm.”

6 Rack specifications.

a. --“allow for “a display cabinet or rack--- used only for bolt action rifles and shotguns. If a rack is securely bolted and concealed, why should it not be used for a semiautomatic firearm, as at present?

b. This is the sort of “law change by Police policy” that caused such disagreement with the select committee recommendations previously.

7 Wooden cabinets specifications

a. “—must meet the standard of “stout” as applied by the. By the what?

2 Not being used for centre fire or rim fire semi-automatic rifles. The same statement I made in relation to racks applies here. If these changes are to be proposed, they must go through a proper consultation process, and be incorporated into the Regulations. A Police guide is not the vehicle for promulgating a change of law.

8 Transition of security requirements

a. Unless the Act and/or Regulations are amended to incorporate such requirements, it is not lawful for Police to impose such changes by publishing them as Police policy. Their Policy is just

	<p>that, and does not override or put additional constraints on licence holders beyond those covered by the Act and Regulations.</p> <p>Receipt form.</p> <p>a. Second sentence of the text. “- the Arms Regulations 1992 and the New Zealand Police as set out in the document.” This is a further example of Police trying to impose law change by Police policy, and as such is totally unacceptable. If Police find the current laws and regulations unworkable, let them put a proper case to Parliament to amend them.</p>
68	<p>I would like to pass some comments on the Proposed Changes to the Firearms Act. I have had a Firearms Licence since the late 1970s, and now handle firearms almost on a daily basis. I believe this means I can pass some Informed Comments on Firearms ownership, in general. Safety always has to be an important factor. This aside, I would really like to say that there are far too many people making Uninformed comments on the private ownership of firearms in this country. The first group that I would point the finger at is the NZ Media, who, after a firearms event in the US, demand changes to firearms ownership here in NZ. Apart from us both speaking English, there is no valid comparison between the two countries. The second is in fact the NZ Police, who in the last 20 yrs. seem to choose Firearms Officers [there are only a few exceptions] that have absolutely no knowledge of Firearms. These people then ask for changes in licencing, which invariably don't work. Consistency, is what all Firearms Owners, really want, not Interpretations by each Police Officer. I have read the Proposals for changes to the Current Firearms Act, and believe nothing much has changed. I believe I will have to ask My Local Officer how he is going to interpret the new changes, and go from there.</p>
69	<p>I welcome the opportunity to submit to the public consultation regarding the secure storage of firearms, I note however that there has been little publicity regarding this consultation and I have only become aware of it though social media.</p> <p>I also note and am disappointed in the significant lack of notice before the consultation closes.</p> <p>There is no specific date (only a month) posted on the Police web page advising of the consultation and it is difficult to determine how long the draft documents have been available for review. With a close off date specified by Police of 1 Dec 17, this leaves only 11-12 days at most for the community to consider the documents, analyse the differences between current policy and each of the April and December drafts, seek legal advice, and respond accordingly.</p> <p>It appears on the face of it that this consultation is not genuine, nor is it in good</p>

faith. Furthermore, the timeline for publishing the final version of the policy is specified on the Police website as being mid-December 2017. This explicitly states that there is Police intent to finalise draft documentation within two weeks of having closed off submissions from the public and firearms community. It is difficult to believe there is genuine intent to consider submissions in good faith, discuss concerns with the community, negotiate amendments or investigate alternatives to any areas of policy concern therein. In summary, both the consideration time available to the public, and the proposed finalisation date of this policy are unreasonable and not in good faith if genuine consultation and a quality, equitable policy is to be formulated.

**I request that NZ Police extend both milestones in order to demonstrate good faith and genuine consultation with the community.**

Due to the lack of notice, the proximity to the consultation close and my personal commitments I have only reviewed the November 17 draft policy.

Regarding the content and wording of the November 17 draft policy please find my comments below

1. The background text at the start of the document presents the policy as "guidelines". On this basis, it is understood that the policy proposes security requirements, but does not specify a mandatory requirement to comply under any legislative onus. If these guidelines are to be legally binding for a licensee, the governing legislation should be cited in order to legitimise the policy, otherwise the policy will remain a collection of security "options".

**Please cite the legislation that would legitimise the policy**

2. The background text at the start of the document specifies "The New Zealand Police (the Police) administers the provisions of the Act and delivers services and enforcement to meet the intent of the Act"

This is not accurate. The Act and its Regulations do not contain the word "intent" anywhere. The use of the word intent implies Police can subjectively apply aspects of legislation or not as they see fit. Law is law.

**Remove "intent" wording and adhere to the police mandate of enforcing law as a police function under the Police Act 2008.**

3. "Where materials, method of construction or locks do not comply with the Police published



standards, remedial action is required to comply."

There is no requirement for a licensee to comply with any Police standards by law, only the legal requirements are specified in the Act and regulations.

The only legal requirement by Police is to determine that a room is of stout construction / strong room / steel box, safe, cabinet etc. as per the Arms Act or Regulations.

**Remove the statement "Where materials, method of construction or locks do not comply with the Police published standards, remedial action is required to comply."**

4. "Although the total security of the residence will be considered, racks will only be considered for approval in the following circumstances:

a. Used only for shotguns and bolt action rifles.

b. Not being used for the secure storage of centre-fire or rim-fire semi-automatic rifles.

c. When they are bolted to a solid floor and in a concealed location, such as a wardrobe which has a solid door with a strong locking mechanism.

d. When they are bolted to a reinforced roof strut or supporting beam in the roof cavity.

e. They are able to withstand violent pushing and tugging and not wobble, become loose or welded points becoming fatigued."

There is no legal basis for the Police to apply such limitations and further break down A Category firearms into sub-groups, nor specify where in a residence weapons racks may or may not be installed, so long as they comply with the Act and Regulations.

**Remove all Police-applied limitations to the installation of weapon racks in this draft policy.**

5. Wooden cabinets must meet the standard of "stout" as applied by the...

**Definition of Stout or reference to governing law is missing. Complete the sentence or remove it.**

6. "The Police define "stout" as being able to withstand an attack by hand tools (not power tools) for at least ten minutes."

This is not a definition of Stout.

What is the basis for specifying 10 minutes and what defines hand tools? Many tools such as a jack, gas torch, even a thermic lance could be considered a hand tool and all of these could defeat even an E cat safe in 10 minutes.

**Remove the definition of Stout as being resistant to a 10 minute attack as it is meaningless and bears no outcome on whether firearms will be taken by a thief or not.**

7. Although the total security of the residence will be considered, wooden cabinets will only be considered for approval in the following circumstances:

- a. Only being used for shotguns and bolt action rifles.
- b. Not being used for of centre-fire or rim-fire semi-automatic rifles.
- c. When they are bolted to a solid floor and wall studs/dwangs and in a concealed location within the residence with the door leading to the room that they are of solid construction, with a strong locking mechanism
- d. When they are bolted to a reinforced roof strut or supporting beam in the roof cavity.
- e. When they are able to withstand violent pushing and togging and not wobble or become loose.

There is no legal basis for the Police to apply such limitations and further break down A Category firearms into sub-groups, nor specify where in a residence wooden cabinets may or may not be installed, so long as they comply with the Act and Regulations.

**Remove all Police-applied limitations to the installation of wooden containers of stout construction in this draft policy.**

8. Regarding steel safes or containers: "Fixed to the building on two surfaces with at least 6 mm fasteners and fastened to a rigid surface or support such as concrete, brick or through plaster board to a stud or dwang. Fasteners of 6mm x 75mm long will ensure at least 50mm of thread is engaged in the rigid support. Use heavy gauge 'coach' screws anchored by at least 50mm and a large washer placed under each coach screw head into the framing. If secured into concrete, use similar gauge chemical or expanding bolts. Floor fixing to a wooden floor must be completely through the floor. The bolts will require a stout backing plate or sufficiently large washers to

prevent them from being pulled through the floor"

Why should a safe or steel container need to be fixed to two surfaces? This does not necessarily increase strength of attachments and is not always possible in rented premises, where getting permission to secure to the floor alone can be problematic for those who are not owner-occupiers.

**Amend to specify fastening to the floor alone as an acceptable standard of fixing** (eg four points of attachment to the floor alone rather than say two to the floor and two to the wall.

9. The policy proposes transition dates to move away from racks and wooden storage for non-endorsed and semi-automatic weapons. This is not in accordance with the Act or Regulations which by law permits the storage of firearms in such arrangements.

**Remove the Police-initiated policy restrictions on wooden containers and metal racks.** No transition plan is required as a result.

10. That the steel is Xmm thick It is impossible to comment on a specification that is yet to be determined.

**Complete the specification proposal so it may be commented on.**

11. RECEIPT DETACH RECEIPT AND PLACE IN APPLICANTS FILE APPLICANT DETAILS

Surname Forename(s) Preferred name Date of birth // I acknowledge receipt from the New Zealand Police of a copy of "SECURITY CONDITIONS AND REQUIREMENTS FOR FIREARMS LICENCES AND ENDORSEMENTS" (Police Form POL67N). I understand that the Police may revoke the licence or endorsement(s) if I fail to observe any of the conditions imposed by the Arms Act 1983, the Arms Regulations 1992 and the New Zealand Police as set out in the document. I further understand that my security precautions must be inspected and approved by a member of the police before I can receive my firearms licence or possess any firearm, military style semi-automatic firearm, pistol, or restricted weapon. Licence holder's signature Date Witnessed by Licensing Vetting Officer / Police Employee name Signature Designation QID Date There is a receipt for that is attached to the rear of the policy which a licensee is required to sign to acknowledge the policy and the law.

This frankly is offensive, New Zealand licensed firearms owners are by definition a law abiding group of people yet here is a body whose responsibility it is to uphold the law, trying to introduce though a back door some form of contract that binds a firearms owner to Police policy. If you need a firearms owner so bound, then the arms act is the vehicle for that, not contract law.

	<b>Remove as there is no legal requirement for a licensee to acknowledge police policy or law by signature, only to comply with the law</b>
70	<p>I wish to provide feedback regarding the draft <i>Secure Storage Requirements for Firearm Licences Holders</i> documents April 2017 and November 2017 versions.</p> <p>I have attached a marked up document (includes April 2017 and November 2017 versions) which highlights specific points, errors and omissions in the aforementioned documents. That document is attached to this email as a pdf file (cannot download file)</p> <p>The main point I would specifically mention is the lack of engineering consideration with regard to the forces involved in the expected design attack that Police consider the security devices and securing means (fixtures and substrate) are meant to resist.</p> <p>The documents refer to the tools expected to be used, the duration of attack, but no mention is made of the intensity of the attack, that is the forces expected in that 10 minute period. By not properly quantifying the forces (as empirical data ie 500 kPa or 1.2 kN) the document is with little real meaning.</p> <p>Also the implied structures seemed to be focused around attaching safes etc. to the walls of a timber framed dwelling. No real consideration has been given to steel framed or composite material dwellings which are becoming more popular in the 'low cost housing market'.</p> <p>There are other considerations that have not been factored in for example the different properties that hard and soft timbers and the effect that has on the withdrawal of the fixings from those types of timbers. NZS 3603:1993 '<i>Timber structures and standards</i>' section 4 Joints offers a considerable amount of information as to withdrawal strengths of various fixings, optimum nail spacing etc.</p> <p>A specific point I will make is the specific mention of 10 mm <math>\bar{A}</math>E reinforcing bars as appropriate reinforcing. The use of 10mm <math>\bar{A}</math>E is laughable. NZS 4229:2013 '<i>Concrete masonry building not requiring specific engineering design</i>', Table 8.3 'sets out the requirements for reinforcement for solid masonry structural walls' and 10 mm <math>\bar{A}</math>E bars are not mentioned. I know that 10 mm <math>\bar{A}</math>E bars are meant to strengthen the structure, but Table 5B '<i>Preferred Nominal diameters, cross-sectional areas and masses for reinforcing steels (New Zealand only)</i>' in AS/NZS 6471:2001 shows that the strength of the steel reinforcing can be significantly improved by increasing the diameter from 10 to 12 mm.</p>

	<p>I found a copy and read a copy of BS7558 '<i>British Standard for gun cabinets</i>'. From an engineering point of view that is a very good document, however its direct translation to NZ building methods and building design will leave a lot to be desired. I can only suggest that Police write a New Zealand Standard for firearms storage. The '<i>British Standard for gun cabinets</i>' can be heavily borrowed from and adapted to NZ conditions.</p> <p>I only hope that Police don't manage to squander this opportunity to actually improve on the engineering basis of their security recommendations.</p>
71	<p>I am writing to you to apprise you regarding a serious issue "Safekeeping Of Guns In Shooting Ranges/ Clubs.</p> <p>On one hand gun owners are expected to invest 1000s in installing safes and other safety measures, Gun shops have complete strong rooms for weapon display (handguns). But safety of guns is seriously being overlooked at shooting ranges.</p> <p>My 9mm pistol went missing from the Waiuku pistol range (Report No- 170925/2080) and is still untraceable. I wish to highlight the lame &amp; unsecure conditions at such ranges, which needs serious attention by the police and law makers.</p> <p>The club armourer (an aged man) alone carries dozens of pistols (mostly 9mm"s) to the range in 2-3 unlocked cases, in the boot of his car. The range has no secure facility (safe) for storing those guns during shooting hours. Guns are distributed from those unlocked cases and from the boot of the car which is parked in an open car park and left unattended for hours when this person acts as a range officer, as pistol training classes continue for hours. There is no check as to who enters / exits the ranges except for the id card that members wear. These cases are left unattended most of the times when this person is walking to and fro checking targets and earnestly watching the members shoot.</p> <p>I now realize that my gun wasn't the first one that went missing, as such instances have happened earlier. I am quite disappointed with this range and am penning down an article which will highlight all this for public awareness. I have also sought details of such disappearances under the Official Information Act.</p> <p>As you are in the process of reviewing "THE SECURITY POLICY", kindly address this.... which is</p>

	<p>a bigger lacunae than safety with gun owners. As these guns would definitely reach criminals and be used in crime, which affects every one of us.</p>
72	<p>I'm at a loss as to why law abiding firearms owners have to spend so much of our family time debating and refuting ill-considered suggestions by NZ Police. I, and the vast majority of firearms users I know, have enormous respect for the Police Force. It's so disappointing to see that respect is not reciprocated. The statistics show licenced firearms owners are some of the most law abiding citizens we have -why do the Police seem hell-bent on changing the rules to try and catch us out or trouble us?</p> <p>My eldest daughter wants to join the Police. Nothing could make me prouder. I wish Police trusted citizens as much. I wish Police could see they are picking on the wrong target. I wish Police could see that we have a great system but they risk making it worse.</p> <p>I appreciate Police feeling defensive, as they have been challenged and corrected and, in the case of the recent Select Committee, shown to be trying to have a finger on the scale. This is not what NZ Police are about. We're lucky to have our cops; please don't abuse that trust.</p> <p>I refer specifically to recent statistics released under an OIA request, and more or less under duress. Licenced firearms owners are not the problem. Focus on the problem and we will support you: only one in one hundred Gun Crimes are committed by firearm license holders  <a href="https://kiwigunblog.wordpress.com/2017/11/27/only-one-in-one-hundred-gun-crimes-are-committed-by-firearm-license-holders/">https://kiwigunblog.wordpress.com/2017/11/27/only-one-in-one-hundred-gun-crimes-are-committed-by-firearm-license-holders/</a> We have a great system. Please don't try to fix what is not broken.</p> <p>I agree with the various organisations lobbying on behalf of the law-abiding - the following are unacceptable problems and fallacies in this latest proposal:</p> <ol style="list-style-type: none"> <li>1) The Police have effectively given licence holders 1 week to make a submission. (If they cannot even get an email address right, its shows why gun registration will not work)</li> <li>2) Police are attempting to reclassify A Cat semi-Automatics into their own security requirements.</li> <li>3) Police will force us to agree to the requirements of their policy (and possibly all future illegal and ultra vires policies) by signing a contract.</li> </ol>

	<p>4) Police have mixed policy with law giving the impression to licence holders that this document is the law. Policy and legal requirement should be separated clearly and concisely to avoid confusion.</p> <p>5) These policies directly affect those who do not own their own home by forcing onerous security requirements that may not be possible for those renting a house.</p> <p>6) A situation now exists where police believe they have authority to implement their policy as law which they do not.</p> <p>I fear police will attempt to codify all policies such as the Pol67N and S43A mail order into law without following the correct parliamentary process. I object to police making law.</p> <p>Police are acting outside of their authority and attempting to circumvent due process.</p> <p>Please, Police - stop before it's too late. Please Stuart and Chris - don't pander, make evidence your basis for decisions. Trust those who elected you.</p>
73	<p>We (as in licenced firearms users) have concerns with the police's request for submissions and the actual police policy itself. Police are attempting to reclassify (by their own internal policy) A Cat semi-automatics into their own security requirements separate from other A category firearms. Police cannot change the classification of firearms by making an Order-in-Council. Any such proposal would need to be approved by Cabinet and be signed by the Governor-General as they state on their own website. They have mixed their own policies with law, giving the impression to licence holders that this document is the law. Policy and legal requirement should be separated clearly and concisely to avoid confusion. The Police intend to force you to agree to the requirements of their policy (and possibly all future illegally implemented policies) by signing a contract as part of your re-licencing or inspection requirements. This will create a situation where police believe they have authority to implement their policy as law which they do not. Police are acting outside of their authority and attempting to circumvent due process. Being forced to sign this policy would remove our rights under the arms act. We saw police attempt this earlier this year with the 2017 Arms Code. As Police minister, you need to take a close look at the way police are attempting to subvert the law. Another fear is police will attempt to codify all policies such as the Pol67N and S43A mail order into law without following the correct parliamentary process. We object to police making enforcement law. In keeping with the Government's recommendations, the police need to be more responsive in consulting with the Firearms Community Forum and the</p>

	<p>wider firearms community. I hope you, Stuart Nash, Minister of Police, can ensure the police do not usurp the Governments powers and allow fair and proper consultation with the firearms community over these issues.</p>
74	<p>A review of the November 2017 Draft Security provision document pertaining to the storage of firearms highlights some concerns.</p> <p>Firstly, for A Category storage requirements, the current regulations allow for racks and cabinets to be made from wood, and provided these are of sufficiently robust construction, there should be no need to progressively phase out storage so constructed.</p> <p>Secondly, there is an attempt here to make a distinction between the secure storage arrangements between A Category Semi Auto firearms and all other A Category firearms. No such distinction is made under any current regulations and none (implied or otherwise) should be made or contemplated with respect to their storage. What this draft document is doing is making “tiers” within the “A Category” firearm definition, which does not exist.</p> <p>For endorsed firearms, the need for a suitably secure steel safe to ALSO be secured within a “room of stout construction” as mentioned in the November document is considered extreme given the current regulations.</p>
75	<p>I have the following feedback on the security booklets.</p> <p>I am a gun dealer, secretary of our local pistol club for 5 years, as well as an active shooter participating in pistol and service rifle events.</p> <p>Firstly i must advise i think it's a good idea to produce a booklet that clearly outlines to all involved the legal firearms storage requirements. I heard only last week of a vetter that refused a restricted safe because it was 10mm walls not the 6mm in their documents (ie it was "Too thick and strong").</p> <p>However i have the following comments</p> <p>1) Firstly it must be noted that desire to get feedback was launched quickly and with minimal time for responses. Police already have a database of all firearms license holders, why do they not use it when asking for feedback or advising of changes on something that has a direct impact on all FAL holders. Do they not trust their own records? And yet many are saying registration will solve all their problems, yet they can't use the database they currently have. One week was not enough</p>



time for feedback on something like this.

2) It appears that Police are attempting to reclassify A Cat semi-Automatics into a separate category (A+?) which will have their own security requirements. i cannot find any reference in the arms act to Semi auto firearms that are NOT MSSA's being a separate category and thus requiring different security requirements. This is especially noted in context to the police submission to the law and order committee last year that stated that "sawn of shotguns and single shot 22's are the most commonly seen firearms in crime", so why are Police reclassifying semi autos and not these "dangerous" firearms. I believe what this document is trying to do in this area isn't covered by the arms act and is an illegal attempt to change NZ law

3) By asking a person to sign the document Police are forcing FAL's to agree to the requirements of this document (Which they are wanting to be policy and possibly all future illegal and ultra vires policies) by "signing a contract". We already sign for our licenses, and agree to abide by the Arms act, why do we need to agree to another separate document

4) Police have mixed policy with law giving the impression to licence holders that this document is the law. Policy and legal requirement should be separated clearly and concisely to avoid confusion.

5) While it is important to remove the ambiguities that currently exist across arms officers and vetters in NZ, i am not certain tying our security standards to those of another country is appropriate. The UK has a different environment, history and crime back ground to NZ. They have different firearms laws to us, many would say ours have been better for far longer. My concern here is if the UK makes a change to firearms law, and thus changes the British Standard for Firearm cabinets BS7558 this will automatically apply in NZ. Maybe this should be considered effective as at a set date (1 Dec 2017) and future changes to the standard not automatically applied without an appropriate review and approval process. Otherwise it is putting NZ laws in the control of a foreign state

6) Reading the document it appears that police believe they have authority to implement their policy as law which they do not. My concern is that police will try to create more bureaucracy and attempt to codify all policies such as the Pol67N and S43A mail order into law without following the correct parliamentary process. I object to police making law.

	<p>Whilst this document is a good idea, Police are acting outside of their authority and attempting to circumvent due process.</p>
76	<p>Here are my views on the current arms act firearm security regulations, and proposed changes in police policy that conflict with the arms act.</p> <p>Current law for security of A category firearms to remain unchanged, because it works.</p> <p>The current law on security of A category firearms in racks and wooden storage cabinets is sufficient to secure them. The separation of the bolt/working parts and storage of all ammunition in a different location, both renders the firearm inoperable and would make it extremely difficult, if not impossible for a home invader to gain access to a working firearm. This part of the arms act should remain intact, because it is proven to work.</p> <p>Home invasion is a crime outside the scope of this submission and will not be further addressed.</p> <p>I am concerned that police policy seems to want to separate A category firearms into different sub-categories, with separate security requirements for certain A category firearms.</p> <p>The law clearly states what constitutes an A category firearm against what is an E category firearm. It also states that the security requirements are different, which is correct. (ie a steel safe or cabinet for E category firearms)</p> <p>Current Law on security of E category firearms to remain unchanged, because it works.</p> <p>The law states that E category firearms can be kept EITHER in a steel safe / cabinet OR a room of stout construction, but the police policy draft released seems to be wanting to have both of these methods of security employed at the same time. This is not an option.</p> <p>This is only achievable for tax payer funded government agencies who can authorise expenditure on every minor policy change, it is not achievable for the vast majority of law abiding firearms owners whose security has been perfectly adequate to date.</p> <p>The law abiding firearms owners, who are the ones that follow the letter of the law as per the Arms Act, already comply with the very good guidance set out there for storage of all category of firearms, without incident.</p>

	<p>I believe that the current laws in regards to issuing of endorsements for restricted firearms and the current security requirements are completely adequate as they are today, and that the arms officers should simply follow the law as set down in the arms act when conducting compliance checks.</p> <p>Consideration and further effort should instead be focussed on the criminals who commit the home invasions, the violent armed robberies, and the gang and drug related drive-by shooting/murders.</p> <p>Another area worthy of closer inspection by the police is the extremely violent robbery of various small business/superettes/bottle stores that has spiked in the last year.</p> <p>If you have any questions on my submission, please contact me.</p> <p>When providing feedback on these documents, in relation to the November document it is worth making the point that the attempt to phase out racks and wooden cabinets for A cat firearms by this method is unlawful because both are expressly allowed by the Regulations. Likewise for Endorsed firearms the need for a steel safe or cabinet to be inside a room of stout construction as implied by this document is contrary to what the current regulations state. If you read the document carefully you will find plenty more to comment on, such as the attempt to make two classes of A Cat firearm by not allowing semi auto to be kept in a rack or wooden cabinet, again the current regulations do not make this distinction.</p> <p>You have a week left in which to make your comments known to police.</p>
77	<p>I have made the time to read the proposed document for updating firearms storage requirements and have made some comments to many of the points. As you will see the extracts from the 'New Zealand Firearms Licence Safe Storage: Police Policy and Practice, November 2017' document are in grey with my comments and recommendations in blue.</p> <p>I would like to highlight that i strongly disagree with the attempt to reclassify all semi-automatic firearms into their own category, including not being able to store them in racks or wooden cabinets.</p> <p>Furthermore I also disagree with the requirement for all restricted firearms to be kept in a strong room OR a room of stout construction AND a steel box/cabinet/safe. This would require people to make renovations to their houses costing significant amounts and may not be possible if renting.</p>

### **Checks on the storage of firearms**

**Inspection following any event that may bring into question a licence holder's suitability to hold a firearms licence.**

This point is very unclear and could be perceived as anything. It is ambiguous and I believe that this should have to pass through the courts to prevent the police department making judgment as to what this event is and prevent any 'event' becoming an excuse to search someone's firearms.

### **FIREARMS SECURITY FOR FIREARMS (Other than those requiring an endorsement)**

**As to whether the specific secure storage option will meet the requirements of the Regulations will depend not only on its construction and fixing to the dwelling, but also on other security factors, such as whether it is concealed from outside observation, difficult to locate by an opportunist burglar, visitor or family member, and internal residential security such as strong rooms, internally locked doors, proximity of neighbouring residences, whether there is a burglar alarm and whether the alarm is monitored.**

These factors should not make a method of firearms security pass or fail, they should carry no weight as to if the security is approved or not, however I do believe that there should be 'recommended'.

### **Rack Specifications**

#### **1. Used only for shotguns and bolt action rifles.**

Gun racks should not be limited to only securing shotguns and bolt action rifles. All firearms excluding endorsed firearms should be allowed to be secured in gun racks that are fixed to the building structure in an approved way.

**1. When they are bolted to a solid floor and in a concealed location, such as a wardrobe which has a solid door with a strong locking mechanism.**

**2. When they are bolted to a reinforced roof strut or supporting beam in the roof cavity.**

Additionally if a firearms is secure in a gun rack by means of padlock etc. it should not need to be locked in a wardrobe or a roof cavity, they should be allowed to be bolted to the wall and it should be recommended that they are out of direct sight from external windows and glass doors.

### **Wooden Cabinet Specifications**

**The cabinet and door must be constructed of 16mm plywood (or thicker). The Police define "stout" as being able to withstand an attack by hand tools (not power tools) for at least ten**

**minutes.**

Being able to withstand an attack by hand tools for at least 10 minutes should not be a factor as this is not a clear guideline and provides no helpful guidance.

The cabinet should be made of 16mm wood or thicker. Plywood should not be specified as this has left no option, it may be recommended to use plywood but it should not be the only wood stated.

**A sturdy hinging system such as a 'piano' hinge (continuous hinge installed inside the cabinet) is required**

Included in the hinge recommendations should be 'the standard door hinges with the hinge pin unable to be removed.

**1. Only being used for shotguns and bolt action rifles.**

Wooden cabinets should not be limited to only securing shotguns and bolt action rifles. All firearms excluding endorsed firearms should be allowed to be secured in wooden cabinets. When firearms are secured in a wooden cabinet, the cabinet should not need to be locked in concealed location they should be allowed to be bolted to the wall and floor in any room however it should be recommended that they are out of direct sight from external windows and glass doors.

**Steel Storage Box, Cabinet and Safe Specifications**

**Fixed to the building on two surfaces with at least 6 mm fasteners and fastened to a rigid surface or support such as concrete, brick or through plaster board to a stud or dwang. Fasteners of 6mm x 75mm long will ensure at least 50mm of thread is engaged in the rigid support. Use heavy gauge 'coach' screws anchored by at least 50mm and a large washer placed under each coach screw head into the framing. If secured into concrete, use similar gauge chemical or expanding bolts. Floor fixing to a wooden floor must be completely through the floor. The bolts will require a stout backing plate or sufficiently large washers to prevent them from being pulled through the floor.**

Fasteners of at least 75mm should not be specified. For this to ensure at least 50mm is in the rigid support it is assuming that the walls/floor is 15mm thick and this is not a requirement. Additionally if a fastener is larger than 6mm it does not allow for shorter fasteners to be used that may be of the same strength if correctly installed. Furthermore if secured to concrete an expanding bolt of 75mm is excessive to hold down a steel cabinet if only going through a few mm of steel.

**Internal or protected hinges that are sturdily constructed of at least 3mm mild steel.**

	<p>Hinges should be allowed to be constructed of 3mm mild steel <u>or equivalent</u></p> <p>Locks and hinges should be located no more than 300 mm from the edge of the door and the longer sides and no more than 600 mm spacing between the locks or hinges. The intent of the hinge and locks spacing is to prevent the door from being opened or bent using jemmy bars or screw drivers. If the risk can be minimised through other mechanical means then it will be considered by the Arms Officer.</p> <p>The requirement for locks and hinges to have no more than 600mm spacing should not be a requirement as all cabinets/safes should be assessed individually to ensure that they are not easily jimmied open</p> <p><b>Transition of Not Endorsed Firearms Security Requirements</b></p> <p>If non-endorsed firearms are secured by any of the 3 methods stated above this should not need to be changed over the next 5 years, this is only going to increase the cost of securing firearms and will do little to change any opportunist from gaining access to firearms. These security requirements should not be aimed at withstanding targeted theft of firearms but to prevent the opportunist theft gaining access to firearms, and the police regulations should be in line with this thinking otherwise it will increase the cost of owning firearms significantly for little benefit.</p> <p><b><u>FIREARMS SECURITY FOR ENDORSED FIREARMS</u></b></p> <p>The Police consider that there are two requirements involved in Regulation 28 of the Arms Regulations (1992), for securing endorsed firearms (category B, C &amp; E): a strong room or a room of stout and secure construction, and steel safe, box or cabinet.</p> <p>I disagree completely with the choice to remove steel safe/boxes/cabinets in their own right as an approved storage facility for firearms. This is going to make the cost of securing endorsed firearms a lot more expensive as it is now going to meet that house renovations are going to need to be made in order to create a room of stout construction.</p> <p><b>There should be no change made to the 3 methods that were previously available, being: a strong room OR a room of stout construction AND/OR a steel cabinet / steel box / safe AND securely fixed to building.</b></p>
78	<p>Security for firearms is a grand ambition. Overseas studies have shown a reduction in suicide rates when firearms are stored secure and unloaded. In addition to the reduction of death and injury to small children, and in addition to reducing the criminal theft and misuse of firearms. Of course, the majority of criminally held firearms are bought into the country illegally from overseas. Think a</p>

criminal gang bringing in a metric ton of meth isn't bringing in a few rifles too? And no security will stop a determined thief.

Any attempts to travel down the path of grand ambition, must be tempered by an understanding of what is reasonable, what is the least set of restrictions that achieves the goals without burdening law abiding firearms holders. Because law abiding firearms owners are not the problem. Criminals misusing firearms are the problem.

Any Police authority to make Policy, Guidelines, and publish little pamphlets stems from The Law. In this case, the Arms Act 1983 (as amended); in Section 74.j of the Arms Act 1983 (as amended), the Governor General is granted the power through Order In Council to pass Regulations pertaining to firearms Security. It is this section of The Law, which grants power to Sections 19 and 28 of the Arms Regulation 1992 (as amended). It is of note that Sections 19 and 28 are held over the License Holder. They are NOT held over the New Zealand Police. Thus, while the Police can publish Guidelines and little pamphlets, these publications have NO weight in Law.

It is beneficial to society that the Police do publish guidelines, even with no weight in law; so that all parties may know what is broadly acceptable; and so there is consistent behaviour in all provinces and by all Arms Officers. It is beneficial that guidelines be clear and concise, so they are not open to interpretation by Arms Officers. Who are only human and have been known to hold grudges against citizens.

Given the desirability of securing firearms, given the powers stemming from The Law towards the Police and License Holders together, I am saddened by reading these drafts and seeing just how far the Police have strayed from the grand ambition.

I question the openness, the honesty and the transparency of publishing a draft, as a surprise to the FCAF whom the Police were "consulting" with. I question how the submission email address was hard to find, and how the wrong address was "accidentally" published first. I question the short consultation period offered. If I didn't know better, I would suspect there is a cadre of hoplophobic bureaucrats in the New Zealand Police Headquarters who are paying lip service to "Public Consultation" before they enact the ultra vires policies they want anyway.

#### **Broad Comments on the Drafts**

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\* Not very well proofread.  
\* Both drafts conflate Police Guidelines and actual legal requirements. This could confuse a new applicant into thinking the more egregious of police wish-lists have weight in law when they do not.  
\* The November Draft references some BS (British Standard), which is not freely available. Any requirements for firearm security must be freely available on the Police Website.  
\* The November Draft attempts to create a subdivision within A-Category firearms. Such a subdivision does not exist in Law, and police have no authority to create a subdivision. ALL A-Category firearms are held to the same standards of security, no matter what action they use - break open, semiautomatic, lever action, or muzzle-loading. This is ultra vires. This is Objectionable. This is Bad Form. This is not acting in Good Faith.  
\* Both drafts include an ultra vires contract which uses Blackmail in the form of threatening loss of license to anyone who does not sign to agree to follow any unlawful, objectionable and ultra vires "Police Policies", including both those currently in force and any as-yet unwritten mandates that will appear in the future. Very Objectionable. License Applicants can be asked to sign a contract to agree to follow the Arms Act 1983 (as amended) and the Arms Regulation 1992 (as amended) stemming from The Act. But Applicants cannot be blackmailed to uphold Policies with no weight in law. This is Objectionable. This is Bad Form. This is not acting in Good Faith.

**Specific Comments on the April Draft presented.**

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Page 3. Section 1.1 "Where materials, method of construction or locks do not comply with the police published standards, the police will instruct what remedial action is required to comply." There is no basis in law for this. License Holders are required to comply with the Arms Act 1983 (as amended) and the Arms Regulation 1992 (as amended). License holders are not required to comply with police published standards.

Page 3. Section 1.2. Arms Regulation 1992 (as amended) Section 19 for "un-endorsed" licenses shows no requirement for police inspection of security at any time. Arms Regulation 1992 (as amended) Section 28 for "endorsed" licenses shows no requirements for police inspection of security at any time. Police inspection of firearms is permitted at reasonable hours, but inspection of security is never mentioned.



Page 4. Section 2.2, Arms Regulation 1992 (as amended) Section 19 does not require "Preventing unlicensed person(s) from obtaining access to the firearms and ammunition". It mentions Young Childs, Theft, and access to both firearms and ammunition. Access by unlicensed persons, except in the form of theft, is not covered. (Note however the Arms Act 1983 (as amended) Section 27.1.b, preventing of access by unfit and/or improper persons, as referenced in the November draft)

Page 4 onward, Section 3. This needs a preface that these are Recommended Police Guidelines for how the license holder can meet the license holder's obligations under Arms Regulation 1992 (as amended)

Section 19; and that these Guidelines are not Legal Requirements.

Page 8, Section 3.4. This section would appreciate a paragraph stating that un-endorsed (A-category) firearms may also be stored together with endorsed firearms in a higher-than-required-for-un-endorsed

security, such as an approved E-Category safe. Just to make it clear to new applicants that they don't need three separate safes to shoot 3-gun (one for the rifle, one for the shotgun and one for the pistol).

Page 8, Section 3.4. Again, the requirement for inspection is unfounded in law. The security must be of a type approved in writing by Police (no inspection), or approved in this instance (which requires an inspection).

Page 11, Section 3.7. This section would appreciate a preface that a Room of Stout Construction may be housed in a building of Insecure construction, and that the following guidelines must be followed for the

entire designated Room, but that Stout Construction is not required for the entire building. This section may also enjoy a note that, particularly in Residential areas, employing visible security on exterior doors and windows may Increase the risk of theft, by suggesting "This house has something worth stealing". Anonymity on the exterior with Security on the interior is a powerful tool.

Page 18, Section 3.14. "I understand that the Police may revoke the license or endorsement(s) if I fail to observe any of the conditions imposed by the Arms Act 1983, the Arms Regulations 1992" (no complaint) "and the New Zealand Police as set out in the document" Very objectionable. The guidelines given in this document do NOT have any lawful basis and it is unreasonable to

demand, upon pain of loss of license that such guidelines be adhered to. "I further understand that my security precautions must be inspected and approved by a member of police". Again, objectionable. There is no requirement in law for this to take place. Particularly in the case of Arms Regulation 1992 (as amended) Section 19, "un-endorsed" firearms require no inspection at all of the firearm nor the security.

**Specific Comments on the November Draft presented.**

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Page 3, "Meeting the security requirements of the Arms Regulations will remain subject to the Police security inspection." Neither Section 19 nor Section 28 of the Arms Regulation 1992 (as amended) state any such requirement. This statement has no basis in law.

Page 3, "Where materials, method of construction or locks do not comply with the police published standards, the police will instruct what remedial action is required to comply." There is no basis in law for this. License Holders are required to comply with the Arms Act 1983 (as amended) and the Arms Regulation 1992 (as amended). License holders are not required to comply with police published standards.

Page 3. "Checks on the storage of firearms" Arms Regulation 1992 (as amended) Section 19 for "un-endorsed" licenses shows no requirement for police inspection of security at any time. Arms Regulation 1992 (as amended) Section 28 for "endorsed" licenses shows no requirements for police inspection of security at any time. Police inspection of firearms is permitted at reasonable hours, but inspection of security is never mentioned.

Page 4, "Firearms security for firearms". This paragraph would appreciate a statement that these are only police Guidelines, and that the actual requirement to meet Section 19 of the Arms Regulation 1992 (as amended) falls upon the license holder.

Page 5, bullet point 1+2 are Very Objectionable. These two statements attempt to create a subdivision within the group of A-Category firearms. But such subdivision does not exist in law, and police do

not have the authority to create such a subdivision. ALL A-Category firearms are held to the same security standards, regardless of colour, shape, and mechanism of action (lever action, bolt action, semi-automatic non-MSSA). The same mistake is made on Page 6 in regard of wooden cabinets.

Page 5, Wooden Cabinet Specifications. 16mm of Ply, but how many mm of engineered timber? And how many mm of milled pine? Do the Police require a greater thickness of MDF, or is MDF specifically disallowed?

Page 6, Steel box bullet point 1 is redundant. All A-category firearms may be stored in any cabinet, rack, or display case which meets the requirements of Section 19 of the Arms Regulation 1992 (as amended).

Page 7, "Transition of Not Endorsed Firearms Security Requirements". That's fine. Just remember that these are police Guidelines; that they have no force in law; and that the actual requirement to meet Section 19 of the Arms Regulation 1992 (as amended) falls upon the license holder.

Page 7, meeting a British standard. This is very objectionable. The BS (British Standard) 7558 requires almost \$200NZD to view. Any and all requirements referred to by New Zealand Police must be available free of charge up on the New Zealand Police website. Be aware that the BS (British Standard) is Copyright, and will require a license to publish in whole or in part upon the New Zealand Police website. Secondly, the internet informs me that to comply with this BS (British Standard), two examples of the container must be tested to destruction. This is an unreasonable burden to place upon small and bespoke container manufacturers.

Page 8, "Security Specification - Endorsed" This section would appreciate a paragraph stating that un-endorsed (A-category) firearms may also be stored together with endorsed firearms in a higher-than-required security, such as an approved E-Category safe. Just to make it clear to new applicants that they don't need three separate safes to shoot 3-gun (one for the rifle, one for the shotgun and one for the pistol).

Page 8, "Security Specification - Endorsed". Again, the requirement for inspection is unfounded in law. The security must be of a type approved in writing by Police, or approved in this instance – which requires an inspection.

Page 8, "Rooms of Stout and Secure Construction". This section would appreciate a preface that

a Room of Stout Construction may be housed in a building of Insecure construction, and that the following guidelines must be followed for the entire designated Room, but that Stout Construction is not required for the entire building. This section may also enjoy a note that, particularly in Residential areas, employing visible security on exterior doors and windows may Increase the risk of theft, by suggesting "This house has something worth stealing". Anonymity on the exterior with Security on the interior is a powerful tool.

Page 14, "I understand that the Police may revoke the licence or endorsement(s) if I fail to observe any of the conditions imposed by the Arms Act 1983, the Arms Regulations 1992" (no complaint) "and the New Zealand Police as set out in the document" Very objectionable. The guidelines given in this document do NOT have any lawful basis and it is unreasonable to demand, upon pain of loss of license, such guidelines be adhered to. "I further understand that my security precautions must be inspected and approved by a member of police". Again, objectionable. There is no requirement in law for this to take place. Particularly in the case of Arms Regulation 1992 (as amended) Section 19, "un-endorsed" firearms require no inspection at all of the firearm nor the security.

#### **Pedantry, April Draft.**

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The following typos notes and unclear text were found while reading the April 2017 Draft. Page 4, section 2.2 "secure storage against the three criteria set out in Regulation 19". There are only two bullet points. Perhaps the first point could be separated at the; so that there are 3 bullet points to match three criteria in the sentence above.

Page 5, Section 3.2 "An example of a wooden cabinets". Singular/Plural.

Page 7, "Hiding a cabinet or rack you reduce the chance of the presence of firearms being noticed". This is clumsy and could be worded better.

Page 9 section 3.5 "there are three options for securing" ... and then only two options are listed.

Page 9 bullet-point 'c', "If locking bars, sliding or shooting, are fitted these can replace the requirement for lock and hinge spacing and can be up to 900mm spacing if over 20mm." Is clumsy. Who is over 20mm in this context? 20mm in which dimension(s)? Also for Room of stout construction, bullet-point 'l'.

Page 11, Hiding your Cabinet, "could prevent your home be targeted." is clumsy and could be

reworded. "Being targeted"?

Page 12, Hiding your Cabinet "Rooms Where". Typo.

Page 12, Locks of buildings, "lock shall". Typo.

Page 12, Section 3.9 Strong Rooms, "or other equivalent reinforcing, such steel," probably meant "such as steel".

Page 18, the applicant is signing for acceptance of document POL67N. But this document has no "POL" label. Is this POL67N? Is there some other document that is being signed for?

### **Pedantry, November Draft.**

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Numbering the sections would make it easier to comment on them. The following typos notes and unclear text were found while reading the November 2017 Draft.

Page 4, "Assessment of Secure Storage". This is much clearer than the April draft. The count of bullet points matches up and Section 27.1.b.iv is referenced for "fit and proper persons", instead of the lazier and incorrect "access by unlicensed persons" from section 2.2 of the April Draft. Well done.

Page 4 "As to whether the specific secure storage option will meet the requirements of the Regulations". The following body of text does not flow well, involving punctuation as well as "and" clauses. It could be

laid out more clearly to make it easier to read and to convey the meaning more clearly.

Page 4 "Rack Specifications" "Below are examples", only one example is given. Singular/Plural.

Page 5 "Wooden Cabinet Specifications" "Wooden cabinets must meet the standard of "stout" as applied by the. The following". Words missing. As applied by who?

Page 5 "Examples of a wooden cabinets". Singular/Plural. Extracts, pages 10-13. Page 4 references the Arms Act 1983 (as amended) Section 27.1.b.iv. It would be beneficial to have the text of 27.1 in its entirety in this Extracts section.

Page 14, Ultra Vires Contract, "I understand that the Police may revoke the licence or endorsement(s) if ..." Which licence? Be explicit.

### **In Conclusion**

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C+

I am not impressed. This draft is rough and makes many mistakes conflating Police Guidelines and Legal Requirements. It attempts to create a subdivision that does not exist and which will only

	<p>be used to harm the Law Abiding, while doing nothing about Criminal Misuse of firearms. It attempts to blackmail the law abiding into agreeing to objectionable things with that contract on the last page. The lofty goal of securing firearms is still a noble good, but this implementation leaves some things to be desired.</p> <p>I look forward to the February Draft, where my concerns are addressed, and where the guidelines return to being guided by The Law.</p>
79	<p>I have made the time to read the proposed document for updating firearms storage requirements and have made some comments to many of the points. As you will see the extracts from the 'New Zealand Firearms Licence Safe Storage: Police Policy and Practice, November 2017' document are in grey with my comments and recommendations in blue.</p> <p>I would like to highlight that I strongly disagree with the attempt to reclassify all semi-automatic firearms into their own category, including not being able to store them in racks or wooden cabinets.</p> <p>Furthermore I also disagree with the requirement for all restricted firearms to be kept in a strong room OR a room of stout construction AND a steel box/cabinet/safe. This would require people to make renovations to their houses costing significant amounts and may not be possible if renting.</p> <p><b><u>Checks on the storage of firearms</u></b></p> <p><b>Inspection following any event that may bring into question a licence holder's suitability to hold a firearms licence.</b></p> <p>This point is very unclear and could be perceived as anything. It is ambiguous and I believe that this should have to pass through the courts to prevent the police department making judgment as to what this event is and prevent any 'event' becoming an excuse to search someone's firearms.</p> <p><b><u>FIREARMS SECURITY FOR FIREARMS (Other than those requiring an endorsement)</u></b></p> <p>As to whether the specific secure storage option will meet the requirements of the Regulations will depend not only on its construction and fixing to the dwelling, but also on other security factors, such as whether it is concealed from outside observation, difficult to locate by an opportunist burglar, visitor or family member, and internal residential security such as strong rooms, internally locked doors, proximity of neighbouring residences, whether there is a burglar alarm and whether the alarm is monitored.</p>

These factors should not make a method of firearms security pass or fail, they should carry no weight as to if the security is approved or not, however I do believe that there should be 'recommended'.

#### **Rack Specifications**

##### **1. Used only for shotguns and bolt action rifles.**

Gun racks should not be limited to only securing shotguns and bolt action rifles. All firearms excluding endorsed firearms should be allowed to be secured in gun racks that are fixed to the building structure in an approved way.

**1. When they are bolted to a solid floor and in a concealed location, such as a wardrobe which has a solid door with a strong locking mechanism.**

**2. When they are bolted to a reinforced roof strut or supporting beam in the roof cavity.**

Additionally if a firearms is secure in a gun rack by means of padlock etc it should not need to be locked in a wardrobe or a roof cavity, they should be allowed to be bolted to the wall and it should be recommended that they are out of direct sight from external windows and glass doors.

#### **Wooden Cabinet Specifications**

**The cabinet and door must be constructed of 16mm plywood (or thicker). The Police define "stout" as being able to withstand an attack by hand tools (not power tools) for at least ten minutes.**

Being able to withstand an attack by hand tools for at least 10 minutes should not be a factor as this is not a clear guideline and provides no helpful guidance.

The cabinet should be made of 16mm wood or thicker. Plywood should not be specified as this has left no option, it may be recommended to use plywood but it should not be the only wood stated.

**A sturdy hinging system such as a 'piano' hinge (continuous hinge installed inside the cabinet) is required**

Included in the hinge recommendations should be 'the standard door hinges with the hinge pin unable to be removed.

##### **1. Only being used for shotguns and bolt action rifles.**

Wooden cabinets should not be limited to only securing shotguns and bolt action rifles. All firearms

excluding endorsed firearms should be allowed to be secured in wooden cabinets. When firearms are secured in a wooden cabinet, the cabinet should not need to be locked in concealed location they should be allowed to be bolted to the wall and floor in any room however it should be recommended that they are out of direct sight from external windows and glass doors.

#### **Steel Storage Box, Cabinet and Safe Specifications**

**Fixed to the building on two surfaces with at least 6 mm fasteners and fastened to a rigid surface or support such as concrete, brick or through plaster board to a stud or dwang. Fasteners of 6mm x 75mm long will ensure at least 50mm of thread is engaged in the rigid support. Use heavy gauge 'coach' screws anchored by at least 50mm and a large washer placed under each coach screw head into the framing. If secured into concrete, use similar gauge chemical or expanding bolts. Floor fixing to a wooden floor must be completely through the floor. The bolts will require a stout backing plate or sufficiently large washers to prevent them from being pulled through the floor.**

Fasteners of at least 75mm should not be specified. For this to ensure at least 50mm is in the rigid support it is assuming that the walls/floor is 15mm thick and this is not a requirement. Additionally if a fastener is larger than 6mm it does not allow for shorter fasteners to be used that may be of the same strength if correctly installed. Furthermore if secured to concrete an expanding bolt of 75mm is excessive to hold down a steel cabinet if only going through a few mm of steel.

**Internal or protected hinges that are sturdily constructed of at least 3mm mild steel.**

Hinges should be allowed to be constructed of 3mm mild steel or equivalent

**Locks and hinges should be located no more than 300 mm from the edge of the door and the longer sides and no more than 600 mm spacing between the locks or hinges. The intent of the hinge and locks spacing is to prevent the door from being opened or bent using jemmy bars or screw drivers. If the risk can be minimised through other mechanical means then it will be considered by the Arms Officer.**

The requirement for locks and hinges to have no more than 600mm spacing should not be a requirement as all cabinets/safes should be assessed individually to ensure that they are not easily jimmied open

#### **Transition of Not Endorsed Firearms Security Requirements**

If non-endorsed firearms are secured by any of the 3 methods stated above this should not need to be changed over the next 5 years, this is only going to increase the cost of securing firearms and will do little to change any opportunist from gaining access to firearms. These security



	<p>requirements should not be aimed at withstanding targeted theft of firearms but to prevent the opportunist theft gaining access to firearms, and the police regulations should be in line with this thinking otherwise it will increase the cost of owning firearms significantly for little benefit.</p> <p><b><u>FIREARMS SECURITY FOR ENDORSED FIREARMS</u></b></p> <p>The Police consider that there are two requirements involved in Regulation 28 of the Arms Regulations (1992), for securing endorsed firearms (category B, C &amp; E): a strong room or a room of stout and secure construction, and steel safe, box or cabinet.</p> <p>I disagree completely with the choice to remove steel safe/boxes/cabinets in their own right as an approved storage facility for firearms. This is going to make the cost of securing endorsed firearms a lot more expensive as it is now going to meet that house renovations are going to need to be made in order to create a room of stout construction.</p> <p><b>There should be no change made to the 3 methods that were previously available, being: a strong room OR a room of stout construction AND/OR a steel cabinet / steel box / safe AND securely fixed to building.</b></p>
80	<p>Go hard, far too many crimes now involve firearms and many of those are stolen from alleged "legitimate owners"</p> <p>It's also known that some "legitimate owners" sell the firearms and make it look like a break in. We need to reduce the number of guns and make them less accessible so we don't end up like other countries that have serious problems such as America and south Africa.</p> <p>Please disregard the submissions of these gun loving hillbilly people e-mailing you.</p>
81	<p><b>Proposed new Rules for Firearm storage, 2017</b></p> <p>I believe the Proposed new Rules for storing firearms have been issued without any meaningful discussion with COLFO. As a result they have not provided any explanation of the background reasons for these proposed changes to the existing approved firearm storage arrangements. There is an obvious need to provide all firearm owners with a Check List for domestic firearm storage covering all the security elements covered by these new Proposed Requirements for the storage of firearms.</p> <p>Firstly there need to be an introductory paper outlining the recorded short-comings of the present regulations, based on the evidence of firearm thefts and the means of access by the thieves.</p>

	<p>There then needs to be a list of Proposed Changes to improve the security standards for domestic firearm storage. I believe the present prescription, if implemented, would cost the firearm owners millions of dollars, without reducing the number of thefts from households, and require a lot of Police time/money, to check compliance. The Check List should include a number of options that allow the present firearm storage arrangements to be modified to achieve a better standard of security that can be certified by a police officer or an approved agent.</p> <p>It would appear that the most practical security method would be to have the firearm storage unit alarmed. The present level of available technology could make the alarming of firearm cabinets/safes for local transmission an economical option compared to installing additional steel and anchoring protection. Let's face it – a battery powered angle grinder will get a thief into almost any metal armoured firearm safe.</p> <p>An approach to COLFO may also provide a better method of improving compliance with any new regulations.</p>
82	<p>I have identified these issues with the police's request for submissions and the actual police policy itself.</p> <p>1: They have effectively given licence holders 1-2 weeks to consider the documents, analyse the differences between the drafts and current policy, seek legal advice then make a submission. The Police state the timeline for publishing the final version of the policy as being mid December 2017. Finalising draft documentation within 2 weeks of closing off submissions from the firearms community and public is a real concern and shows the Police aren't acting in good faith. There is no time allowed for proper discussions, negotiating amendments or looking at alternative solutions for concerns raised by the submissions.</p> <p>2: The Background text at the beginning of the draft policy states; "The Booklet is a guide to assist a license holder with their firearms licence application and to prepare their security requirements and will not in itself constitute an approval of security by the Police pursuant to Regulations 19 and 28 of the Arms Regulation 1992". There is no mention of a mandatory requirement under any legislative onus to comply with this "Booklet".</p> <p>Yet a 'Police Form 67N' has been created for Applicants to fill out under the heading "SECURITY CONDITIONS AND REQUIREMENTS FOR FIREARMS LICENSES AND ENDORSEMENTS",</p>

	<p>stating "I understand that the Police may revoke the licence or endorsement(s) if I fail to observe any of the conditions imposed by the Arms Act 1983, the Arms Regulations 1992 and the New Zealand Police as set out in the document.</p> <p>3: This "Booklet" was drafted as a guide not a legally binding document to give the NZ Police legislative power to create their own laws outside of the current Arms Act and Arms Regulations.</p> <p>4: Police are attempting to reclassify A Cat semi-Automatics into their own security requirements. This is not in line with the current Arms Act or Arms Regulations. Under Steel Storage Box, Cabinet and Safe Specifications they propose that the steel is "Xmm thick". How are we able to submit on a crucial point as vague as that? Under Wooden Cabinet Specifications it states "Wooden cabinets must meet the standard of "Stout" as applied by the." The definition of stout or reference to governing law is missing. Complete the sentence. Refer Point 3.</p> <p>5: Police will force you to agree to the requirements of their policy (and possibly all future illegal and ultra vires policies created at their discretion) by signing a contract. Refer Point 3.</p> <p>6: Police have mixed policy with law giving the impression to licence holders that this document is the law. Policy and legal requirements should be separated clearly and concisely to avoid confusion. Refer Point 3.</p> <p>7: These policies directly affect those who do not own their own home by forcing onerous security requirements, outside of the current Arms Act and Arms Regulations, which may not be possible for those renting a house.</p> <p>8: A situation now exists where police believe they have authority to implement their policy as law which they do not. Refer Point 3.</p> <p>I fear police will attempt to codify all policies such as the POL67N and S43A mail order into law without following the correct parliamentary process. I object to police making law.</p> <p>Police are acting outside of their authority and attempting to circumvent due process.</p>
83	<p>I write with serious concerns about the proposed changes to firearm storage regulations. These concerns are two fold, the manner and time frame in which submissions were called for and the</p>

proposed changes themselves.

New Zealand Police have failed to give adequate notice of a call for submissions. This process should have alerted all firearm owners to these proposed changes to allow them to comment. The extremely short time given to firearm owners for assessing the proposals and formulating responses, effectively a week, is totally unacceptable and NZ Police conduct and motives are being questioned by law abiding citizens.

With regard to the proposals themselves I have serious concerns that yet again law abiding citizens are being required to institute security measures that should not be required if the rate of burglary was addressed by the agencies responsible. No one wishes to see people's property being stolen anywhere at any time and I clearly believe that is where any further resourcing and efforts need to go. While making it more difficult for thieves to steal firearms sounds a reasonable step it will just result in the thieves coming prepared to use more force to enter secure storage. It may even result in targeted home invasions seeking firearms through aggravated robberies or worse. I would welcome severe penalties being imposed on those who steal firearms, procure them illegally or use them in crimes. I think that is the only way to address these issues as a society. However, I also believe a combined effort by law enforcement, the public, sports clubs and firearm owners to educate those who may be on the fringe of the law with regard to how they use and store firearms is needed. The implementation of firearms training in the 1970's saw dramatic changes to the way firearms were used in New Zealand. I believe a similar situation exists with a smaller group today and that needs addressing but these proposed changes do not address those issues and fail to make any changes that will ultimately be material to the safety and security of New Zealanders

These proposals will effectively reclassify A Cat semi-automatic firearms routinely used for sport and pest control by thousands of licenced firearm owners into a more restricted category for no quantifiable result.

The inclusion what could be construed as a contract that must be signed would be described as stand over tactics or effectively black mail in other situations and most certainly is not required or

	<p>desired. This must not be instituted. Use of this type of overzealous signing of documents serves no purpose when the person has already been judged to be a fit and proper person to own and use firearms.</p> <p>How these proposals will affect those living in rental accommodation needs to be considered thoroughly. Clearly this document indicates that has not been part of the process.</p> <p>Yet again we see NZ Police proposing and promoting changes to regulations around firearms. They may believe that is their role but these changes require much deeper analysis and balanced assessment of their impacts. I do not believe NZ Police should be in the position of having to make those judgements despite being at the wrong end of the barrel in their day to day work. Parliamentary process are not perfect but they are where laws are made and I believe firearm laws should be subject the same process and rigour as any other law. Codifying Police regulations into law is a process fraught with being seen to be undemocratic and driven by one organisation that is unable to make the balanced judgements required.</p> <p>I sincerely hope you will consider my comments carefully and not institute changes that will fail to result in any significant change to criminal activities but will impact law abiding citizens greatly through unjustified increases in costs and inconvenience.</p>
84	<p>RE: Consultation – Secure storage requirements for firearm licence holders: Police policy and practice.</p> <p>Police seek feedback on two documents concerning alterations in police policy and practice formerly laid out in POL67N – which has now been removed from Police website.</p> <p>The problem with the documents is that even the former POL67N document is under question as to its ultra vires nature and fettering of discretionary powers of individual Police tasked with administering security requirements laid down in the Arms Act 1983 and Arms Regulations 1992.</p> <p>Indeed both s28 and s29 of the Arms Regulations 1992 it appears are ultra vires the Arms Act 1983 due to contrary delegation of powers reserved to the Governor General regarding security Regulations and other matters.</p> <p>Surely before further forays by Police into areas of ultra vires fettering of discretionary powers the very basis of those assumed powers MUST be brought into alignment with the Arms Act 1983.</p>

	<p>The authority to formulate security precautions is vested in the Governor General by Order in Council – which is NOT transferable to Police. So Police simply have not been legislated the authority to insist upon security precautions above and beyond those prescribed by Regulations made by Order in Council according to the Arms Act 1983 s74(1)(j).</p> <p>The proposed use of Contract – forced agreement to Police possibly ultra vires “requirements” in addition to existing Law and Regulation – appears duplicitous and despicable.</p> <p>The whole of both documents and the former POL67N – and indeed Police “policy” – need a complete rethink.</p>
85	<p>I am Dave von Elling. I am President of the Auckland Service Rifle Association.</p> <p>1. The recommendation that people with endorsements to their Firearms Licences should have their E and B type safes also stored inside strong rooms with 6mm equivalent safety is quite unacceptable.</p> <p>These members already have secure facilities which have been inspected by the Police and considered secure. There are some 4000 B Cat and some 6000 E Cat licence holders. The cost of building or renovating existing rooms as strong rooms could be in excess of \$30000 to \$40000. This equates to over than \$300million. The Police could easily be faced with this kind of expense if it came to litigation. The current security requirements as required by the Arm Act are quite satisfactory. Every house can be considered already a strong room as they have secure doors and locking systems.</p> <p>2. The recommendation that all semi auto firearms are stored in the same security state as for endorsed firearms is contrary to the Arms Act as a lot of these are A Cat firearms. This is in effect creating another category of firearm which is contrary to the current Arms Act. This recommendation could also create a massive cost way over that estimated for endorsed firearms as there are significantly more A Cat semi autos than endorsed firearms. The situation where the Police inspect security for endorsed firearms is quite adequate as if something is considered unsafe in terms of current requirements then the licence holder is required to attend to it.</p>
86	<p>Having read through the proposal document (dated November 2017) the committee of the Wellington Service Association have several concerns not only for our members but all licensed firearms owners.</p> <p>We note omissions between the two versions but no explanation has been issued as for the</p>

changes.

It is somewhat tiresome that once again, licensed, vetted and police approved firearms owners are being targeted while criminals remain, essentially untouched by changes.

We are very concerned that the proposal attempts to isolate a subtype of A category firearm by applying similar if not identical security requirements as if they were “restricted”. Once again, no evidence has been presented that A category semi-automatics are any greater risk to public safety and any other firearm type or classification. Instead it is of our opinion that the proposed changes to well established guidelines is more about public perception than based on fact or public safety.

Many of our members own and utilise A category firearms exclusively and to have them singled out with a law change by proxy is unacceptable.

We also oppose the proposed changes that would require restricted firearms be contained not only in a safe that complies to a never before applied (within NZ firearms law) British standard but also that that same safe be stored in a room of “stout construction”. These two examples are also contrary to the current regulations and appears to be yet another attempt to change NZ law by policy which further affects trust.

As proposed, the changes would be considered unacceptable by WPSSC for the following reasons:

1. Demonization/treatment of a sub class of A category firearms and their owners without just cause nor supporting evidence as to the change.
2. Unjustified extra expenses being applied onto new and existing sport shooters once again, with no justification nor compensation offered.
3. No provision/allowance for temporary rental accommodation options
4. Adoption of a non NZ standard that NZ FAOs cannot address or provide input to.
5. The removal of wooden cabinets and racks as options without fair or just cause
6. No grandfathering clause for existing security ( especially that which has undergone yearly checks since the 1992 act was introduced)
7. No compensation offered to owners of existing approved security to upgrade
8. The inclusion of requiring a room of stout construction on top of a safe for restricted firearms

	<p>9. No identification as to how police intend to train all vetting officers to apply the proposed standards evenly across the country ( which is how the current alleged security situation has occurred, if indeed any problem exists)</p> <p>10. No disincentive to criminals but ample opportunity for FAOs to be treated as such.</p>
87	<p><b>For the FCAF Committee</b></p> <p>Having read both April and November Drafts plus the British Standards for Firearm Safes I offer the following comment.</p> <p>Once again Police Policy is overruling the Arms Regulations as they stand today. I say this as I have been phoned by one of our Club Members (The Hamilton Pistol Club) saying that he has been told by a Police Vetting Officer that his Firearms License will not be renewed unless he installs a steel safe (3mm) for his A Cat firearms. He has been a B Cat holder for many years and undergone License renewal in the past. He has told me that his B Cat safe is secured inside his secure A cat cabinet built to comply with Regulation 19(2) (a) (i).</p> <p>A Police Vetting Officer I know (not mine) informs me that he is insisting that a steel 3mm safe is required for A Cat firearms before he signs off for License renewal where he thinks the current security is not up to standard. Very subjective.</p> <p>Regulations 19 and 28 have stood the test of time and, while A Cat storage could be better defined, the problem lies in the Standard of a steel safe. Many hundreds of proactive Licensed Firearms owners have been purchasing steel safes for their A Cat firearms for some years now from dealers and on-line. These safes do not have an Engineers certificate mainly because there is no Standard by which to judge them. What is to come of these safes if and when Regulation 19 changes. Will they be permitted to carry on using them?</p> <p>Has anyone in the NZ Police done a Cost/Benefit Analysis on the proposed changes bearing in mind that you are dealing with over a quarter of a million Licensed Firearms holders, and growing?</p> <p>To my knowledge there has never been a Standard promulgated for A Cat steel safes by the NZ Police and the only Standard I am in possession of is for B &amp; C Cat safes, C2191 dated 1988.</p> <p>The British Standard BS 7558:1992 for Gun cabinets does not require any specific thickness or grade of material, only the requirement for those items in Para 4, Construction Note 3, and</p>



	<p>Appendix A for resistance to attack. Should New Zealand adopt this British Standard minimum steel thickness may no longer be a requisite.</p> <p>The proposition of requiring Regulation 28 for Endorsed Firearms to be stored in a steel safe or cabinet inside a room of stout construction borders on farcical. As well as not being a requirement under Regulation 28, how many B,C, &amp; E Cat holders have room or space available to construct a room of stout construction to secure their safe or cabinet let alone the many persons who are boarding, or renting accommodation. The present guideline requiring a safe or cabinet to be out of sight in a confined space is common sense.</p> <p>The further proposition of separating the storage of .22 semi-automatic rifles from bolt action rifles for storage is ill thought out. Imagine the duck hunters having to separately store their double barrel shotgun from their semi-automatic shotgun in differing safes or cabinets. Not such a silly idea when you are asking .22 rifles to be separated in this fashion. This is not the way the Regulations are presently written.</p> <p>Available statistics (to 2014) regarding burglaries from dwellings show a continuous reduction of offences in a growing population. NZ Police themselves cannot say how many firearms are stolen annually from Licensed Firearms holders.</p> <p>In New Zealand we have the world's best firearms laws now. Please stop tinkering with them and PLEASE stop trying to introduce changes to the Arms Regulations BEFORE they become Law under the Rule making process.</p>
88	<p>Please find below my feedback regarding the proposed changes to firearms security.</p> <p><b>Notes applicable to both April 2017 and November 2017 proposals:</b></p> <ul style="list-style-type: none"> <li>- There are a number of spelling and grammar errors through both documents, this indicates that it probably hasn't been properly reviewed or edited. This would suggest it was put through in a rush or as a knee jerk reaction without appropriate consideration.</li> <li>- The definition of a hinge is simply "sturdy." This is open to interpretation by vetting officers, resulting in inconsistent standards being applied between regions (which already happens with a number of criteria). It also recommends piano hinges, however most piano hinges are not heavy duty and would require deliberate over securing by someone that knows this (it is highly likely that some people will only use what they deem reasonable, which will be substandard). This could be</li> </ul>

resolved by stating a minimum gauge / sized hinge that had to be secured using XXmm screws every XXmm. Additionally the examples pictured do not show piano hinges, which could lead to difficulties if piano hinges are required in future.

- For those that are renting and storing firearms off site, will this raise the minimum security requirements that are required?

- Criteria for steel cabinets / boxes / safes:

- No mention of drop in safe doors or whether these will still be approved.
- Using the phrase "6mm mild steel or equivalent" is open to interpretation. Some vetting officers currently do not accept engineering certificates regarding hardened steel that is of 6mm equivalent (they only focus on the 6mm requirement).
- Handles designed to break off under leverage: This may not be met by a number of safes in use at the moment. Would there be leeway in policy / from vetting officers regarding this? What would be the maximum force required to break the handle? How would this be measured or assessed?

Criteria for rooms of stout construction:

- Having doors with an external steel covering makes them difficult to disguise. It is recommended that cabinets are hidden, having steel or steel coated doors outside the room defeats this purpose.
- Using the paragraph headings "Doors / Windows / Walls, Ceilings, Floors / Locks of Buildings" implies that these changes are required to be added to external areas of the building. It should be changed to state that it only applies to the room that is to be reinforced. Otherwise people will be required to turn their property into a "fortress".
- These changes would be very expensive for some people to retrofit existing properties.
- These changes are not practical in rental properties. This would be either landlord reluctance to modify property or tenant reluctance to advertise to the landlord they own firearms.
- These requirements are specifically for firearms and are not required for any other storage (to my knowledge). As these cannot be done DIY style by most individuals it would require builders to complete. The specific nature of these requirements would immediately tell builders that firearms are likely to be stored there, presenting those people as targets for robberies and exposing other family members to risk.

**Notes applicable to April 2017 Proposal only:**

- There is a section for general security (such as gates, dogs etc). This should be listed at the end

	<p>under a section called "Additional Security Recommendations." For multiple reasons it would not be possible to implement these as policy, however having them under a section called "General Security" would make it sound as though they are required.</p> <p>- There are two different lists for the requirements of steel cabinets and stout and secure rooms. There are some significant differences between them (such as lever locks or lever lock equivalent). This would create confusion with both firearms owners and vetting officers.</p> <p><b>Notes applicable to November 2017 Proposal only:</b></p> <p>- It is stated that there is going to be a 10 year transition period if this comes into effect. What will be the cut-off for those that undergo renewal during that time (i.e. renewals in the first five years will not be subject to this?)</p> <p>- There is no specification to the steel thickness for safes. This should have been stated.</p> <p>- There is no definition of the requirements for a strongroom - only a room of stout and secure construction.</p> <p>- It only lists the policy requirements for a safe or steel cabinet for endorsed firearms. There is no guidance on what would be approved / not approved. Would this be the same as the proposed requirements for A-Cat semi-automatics?</p> <p><b>General Points:</b></p> <p>- Is there going to be a guaranteed period where these requirements will not change (i.e. will the goalposts remain stable and not be moved every few years?)</p> <p>- Based on recent minutes of the Firearms Community Advisory Forum (FCAF), the Police do not appear to have accurate data regarding whether seized illegal firearms were stolen, smuggled or purchased legally then on sold illegally. If this data was more accurate it would be able to inform us if stolen firearms are in fact a large source of illegal firearms. If not, these proposals could be seen as potentially excessive.</p> <p>I am more than happy to discuss any of the above points further if required.</p>
89	<p><u>Page 3.</u> Firearms Security for Firearms (A Category firearms)</p>

	<p>As to whether the specific secure storage option will meet the requirements of the Regulations will depend not only on its construction and fixing to the dwelling, but also on other security factors, such as whether it is concealed from outside observation, difficult to locate by an opportunist burglar, visitor or family member, and internal residential security such as strong rooms, internally locked doors, proximity of neighbouring residences, whether there is a burglar alarm and whether the alarm is monitored.</p> <p>I personally feel that steel cabinets are the sensible way to go but that is not always practical in every home situation, which is why the current regulations allow simpler options such as racks and wooden cabinets. Also the current Regulations DO NOT require a steel cabinet to be kept in a room of stout construction but allow three options – either a strong room OR Room of stout construction OR steel cabinet.</p> <p>Page 5. Steel Storage Box, Cabinet and Safe Specifications There are no existing guide lines for the construction of steel cabinets or strong rooms in current legislation.</p> <p>Page 6. Transition of Not Endorsed Firearms Security Requirements (from Date to Date – ten years) Just exactly what is British standard (BS7558). Also the requirement to meet this particular standard could possibly make those existing NZ gun cabinets no longer acceptable. At would cost would this come? I believe this requirement to be unreasonable!</p> <p>Page 13. Receipt Form This should simply be a receipt to acknowledge that I have received the document (POL67N). I am only bound to comply with the Act and Regulations not this document, which is only a guide.</p>
90	<p>I have noticed that the police have confused their own policy with the Arms Act and are abusing their position of power and monopoly on the regulation of firearms to force a situation they want, rather than how it should be according to the Arms Act. It is outrageous to assume that all persons with an interest in the matter be able to make an informed decision and response by Dec. 1st when people like myself found out a matter of days before the deadline. The exact financial implications of the proposed changes are impossible to evaluate in such a short span.</p> <p>Furthermore, they are also attempting to effectively reclassify A Category semi-automatics as being the same as E Category firearms by imposing the same security requirements, essentially forcing a .22 long rifle for hunting rabbits be under the security regime as a Military style semi-automatic AR-15.</p>

	<p>These policies will directly affect those who do not own their own home by forcing onerous security requirements that may not be possible for those renting. This directly affects me as a sports shooter on an A cat license as I would be forced to spend over a thousand dollars of my own money to comply with the proposed security, a requirement which, frankly, I find ridiculous since I am young, starting university, and struggling to survive in a sport dominated by older people.</p> <p>These changes are especially ludicrous given that the police, never mind the media, don't know where criminals are actually sourcing firearms from, a fact which has been admitted by the police force themselves. Their response has been to make the life of all law-abiding licensed firearms owners harder, rather than identifying the sources and stopping them. I ask you; how often do we see gun-safe break-ins on the news? Are these changes really going to tackle the issue or is it just blind policy drafting to act as a smokescreen to mask the fact that they have no idea what to do. A prime example of disappointing incompetence on the part of the lawmakers is the proposed changes in June of this year. Proposal 1 stated that a firearms licence must be possessed to own ammunition when in fact this stipulation has been codified since 1992 as per section 43B.1.a.</p> <p>I have put in an Official Information Act request with the police asking how many gun safe break-ins there are per year and have been in the last ten years, and have also asked for the number of firearms stolen per year for each category. I have no doubt that the response will prove that gun-safe break-ins are not remotely as large a source of firearms for criminals as police make it out to be, therefore stricter security for law-abiding citizens would be an entirely pointless effort.</p> <p>As an avid sport and recreation shooter who has (in spite of recent events) a high regard for the police and the integrity of our democratic system, I would be happy to answer your questions to increase our government's insight into this matter. I also plan to keep you and my local MP updated on this issue, especially once I get the response from my Information Act Request.</p>
91	<p>Thank you for the opportunity to submit on the proposed changes to the firearm storage laws.</p> <p>I would just like to start by saying that unfortunately I feel there wasn't enough time for me to really study this properly as I'm a farmer and this is one of the busiest times of the year for us, we have really only been given a week, so not very long for something of such importance to submit on. I feel there are heavy and strong enough safes around that are suitable for endorsed firearms that can be used without needing to be in a stout room.</p>

	<p>Also I'm worried that when wooden cabinets and racks are fazed out people with a small collection of A Category firearms will hide them instead of spending the money to buy steel safes.</p> <p>Let's say someone has collected early .22's because they have been reasonable cheap to buy and they have 80 firearms, so instead of having to buy let's say 8 to 10 gun safes that hold 10 guns each they just buy 2 and hide the rest instead of having to fork out a large amount of money that this would require.</p> <p>Now if this happens they won't have insurance and if they have a burglary they won't let the police know the firearms are gone, so we will be worse off.</p>
92	<p>I have read the proposed changes and have these comments.</p> <p>I have no objection to the general principal of increased security retirements for firearms license holders.</p> <p>Police are attempting to split firearms into two categories. Centre fire and rimfire semi autos have stricter requirements than bolt, pump action and lever action rifles and all types of shotguns. This is illogical as the bullet any type of rifle is as dealt add any other. This policy appears to be based on the look of the firearm rather than its function and that just seems like a bad way to make legislation. In addition to this Police are trying to enforce Police policy as law by making firearm owners sign a contract. Law/Legislation is the role of parliament not Police.</p>
93	<p>I would like to support the April Draft regulations in this matter</p>
94	<p>I am writing to comment on the proposed changes by policy of the secure storage of Firearms as laid out in the linked documents at the bottom of this email.</p> <p>Firstly in both versions you are trying to re-classify A-Category Semi-Automatic Firearms by way of separate security requirements compared to other A-Category Firearms. This contravenes the Law. Also in both versions you require Firearms Owners to sign a contract whereby you threaten revocation of the Firearms License and/or any endorsements if it is not signed.</p> <p>"I acknowledge receipt from the New Zealand Police of a copy of "SECURITY CONDITIONS AND REQUIREMENTS FOR FIREARMS LICENCES AND ENDORSEMENTS" (Police Form POL67N). I understand that the Police may revoke the licence or endorsement(s) if I fail to observe any of the conditions imposed by the Arms Act 1983, the Arms Regulations 1992 and the New Zealand Police as set out in the document"</p>

This is absolutely outrageous when you consider that the highlighted part of the quoted text is Police Policy not Law. In short this is an Ultra Vires practice where Police are overstepping their mandate as enforcers of the Law not the makers of the Law. Also this then, when signed will apply to any future Policy changes by Police. And it has to be asked will an applicant's security not be approved if the said receipt/contract is not signed. In short Police are attempting to implement policy that has no legal standing. Being forced to sign this policy would remove our rights under the Arms Act. We saw Police attempt this earlier this year with the 2017 Arms Code.

There are issues with both proposals because any Police policies and practices must be consistent with the Law; neither proposal is.

Regulations 19 and 28 of the Arms Regulations 1992 sets out the conditions relating to security precautions. The legal authority for the promulgation of the regulation is s 74(1) (j) of the Arms Act 1983. The authority to prescribe security precautions for firearms is vested in the Governor General; not the Police. Therefore Police may not insist on security precautions that are not prescribed by Regulations made by order in council in congruence with s 74(1) (j). Regulation 28 is partially ultra vires because the Governor General has ostensibly delegated anon-delegable power by making security precautions subject to police approval. This delegation is not authorised by the empowering Act. Therefore the ostensible police veto is not enforceable because it is unlawful (see Hawkes Bay Raw Milk Producers Co-op Ltd v NZ Milk Board [1961] NZLR 218 (CA).).

If the Police believe that the present security requirements set out in the Arms Regulations are inadequate, the response ought to be directed at changing the law rather than the Police policies and practices. Trying to foist unauthorised (and therefore unlawful) Police policies on civilian gun owners and enforcing them by unauthorised practices bypasses the parliamentary process and oversight of the legislature; that is unacceptable in a free and democratic society such as New Zealand and as previously discussed, doomed to the same judicial rejection as the police pistol grip policy in 2009.

In summary have identified the following issues with the police's request for submissions and the actual police policy itself.

1) They have effectively given licence holders 1 week to make a submission. Due to an incorrectly

	<p>published email address. No other Government organization would be allowed to operate in such a manner, so why should the police?</p> <p>2) Police are attempting to reclassify A Cat semi-Automatics into their own security requirements.</p> <p>3) Police will force you to agree to the requirements of their policy (and possibly all future illegal and ultra vires policies) by signing a contract.</p> <p>4) Police have mixed policy with law giving the impression to licence holders that this document is the law. Policy and legal requirement should be separated clearly and concisely to avoid confusion.</p> <p>5) These policies directly affect those who do not own their own home by forcing onerous security requirements that may not be possible for those renting a house.</p> <p>6) A situation now exists where police believe they have authority to implement their policy as law which they do not.</p> <p>I fear police will attempt to codify all policies such as the Pol67N and S43A mail order into law without following the correct parliamentary process. I object to police making law.</p> <p>Police are acting outside of their authority and attempting to circumvent due process.</p>
95	<p>This submission is in reference to the documents put up for consultation by the New Zealand Police, namely the "April 2017 Draft Firearms Secure Storage Policy" and "November 2017 Draft Firearms Secure Storage Policy" documents, which can be found on the NZ Police website.</p> <p>Prior to dealing with the specifics of the policy, I would first like to object to the scope of these documents and the handling of this situation.</p> <p>Due to negligent behaviour, the police have effectively given license holders about a week to make a submission due to only alerting us of this policy a few weeks prior and then initially providing the wrong email address.</p> <p>The police are also effectively using this policy to make their own law, by attempting to reclassify A</p>



Category semi-automatic firearms as needing security requirements different to that of all other A Category firearms. We live in a parliamentary democracy and the police should under no circumstances be attempting to override Acts of Parliament with their own policy.

Next, the police will require us to agree to their policy (and possibly all future illegal and ultra vires policies) by signing a contract. This is at the very least offensive and at the worst illegal behaviour by the police.

Lastly, the police have mixed policy with law giving the impression to licence holders that this document is the law. Policy and legal requirement should be separated clearly and concisely to avoid confusion. A situation now exists where police believe they have authority to implement their policy as law which they do not. I fear police will attempt to codify all policies such as the Pol67N and S43A mail order into law without following the correct parliamentary process. I strongly object to police policy making law.

Police are acting outside of their authority and attempting to circumvent due process.

With my concerns around the actions of the police above, I would like to add a few points of concern to the specifics of the policy.

Firstly, the policy targets A Category semi-automatics for additional security requirements, beyond that of other firearms and that which is required by law. There is no justification given for this move. Can the police cite statistics that show semi-automatics are more likely to be stolen from a rack, than say a bolt-action, lever-action, pump-action, or break-action? Can the police show that semi-automatics are inherently more dangerous or used in crime to justify their discriminatory policy? The police have presented this policy without any justification for it.

Next, the requirement for a safe can be an onerous one, especially for those who do not own their own homes. This policy could lock many renters out of owning a semi-automatic, and eventually, all firearms.

This policy also adds an additional barrier-of-entry to shooting sports and hunting. A safe is significantly more expensive than a rack or a solid cabinet. Likewise, this policy may see more buying cheap safes simply to comply, giving only the illusion of increased security. I would suggest that since safes

	<p>are generally more visible, often located in garages, and easier to target than a firearm that is locked away in a more inconspicuous area of the house where it cannot easily be found. Do the police have any data to show that a semi-automatic firearm in a safe is more secure and less likely to be stolen than one stored on a rack or cabinet? The police have provided us with no such data. I would reiterate that I believe this policy is harmful and will not help to reduce the issue of firearms theft. If the police do wish to solve this issue then I suggest that they consult with the firearms community from the outset, rather than giving us mere weeks to respond to proposals. Changes to the laws of the land should be made through the proper processes and not by police policy.</p>
96	<p>Having read through the New Zealand Police's "Secure storage requirements for firearm licence holders: Police Policy and practice" proposal <a href="#">document</a> (dated November 2017) the committee of the Wairarapa Pistol and Sports Shooting Club have several concerns. We also note various omissions from the original version to this one which make interpretation as to how the proposed standards will be applied even less clear. While we welcome any attempt at improving security, we do resist, once again, Police attempts at undoing over 20 years of agreed standards and successful security inspections with little or no facts being presented that licensed Firearms Owners are, indeed, the problem.</p> <p>As example, we are concerned that the proposal attempts to isolate a subtype of A category firearm by applying similar if not identical security requirements as if they were "restricted". Once again, no evidence has been presented that A category semi-automatics are any greater risk to public safety and any other firearm type or classification. Instead it is of our opinion that the proposed changes to well established guidelines is more about public perception than based on fact or public safety.</p> <p>We also oppose the proposed changes that would require restricted firearms be contained not only in a safe that complies to a never before applied (within NZ firearms law) British standard, but also that that same safe be stored in a room of "stout construction". These two examples are also contrary to the current regulations and appears to be yet another attempt to change NZ law by policy which further affects trust. As proposed, the changes would be considered unacceptable by WPSSC for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Demonization/treatment of a sub class of A category firearms and their owners without just cause nor supporting evidence as to the change.</li> </ol>

	<p>2. Unjustified extra expenses being applied onto new and existing sport shooters once again, with no justification nor compensation offered.</p> <p>3. No provision/allowance for temporary rental accommodation options</p> <p>4. Adoption of a non NZ standard that NZ FAOs cannot address or provide input to.</p> <p>5. The removal of wooden cabinets and racks as options without fair or just cause</p> <p>6. No grandfathering clause for existing security (especially that which has undergone yearly checks since the 1992 act was introduced)</p> <p>7. No compensation offered to owners of existing approved security to upgrade</p> <p>8. The inclusion of requiring a room of stout construction on top of a safe for restricted firearms</p> <p>9. No identification as to how police intend to train all vetting officers to apply the proposed standards evenly across the country ( which is how the current alleged security situation has occurred, if indeed any problem exists)</p>
97	<p>Thank you for the opportunity to comment on the two drafts of your proposed Police Firearms Storage and Security Policy.</p> <p>Given the brief time that you have allowed for consultation, and the apparent lack of wide advertising of the fact that you are consulting on this matter, I find myself with little time to give comment in as much depth as I would like, so apologies in advance for the bullet point and somewhat random nature of this response. I have only addressed the proposed requirements that you set out for "A" Category security</p> <p>I must also say that once again I feel that you are targeting responsible licensed fire-arms owners, who obey the law. Yes there are a number of licensed firearms owners whose security undoubtedly leaves a lot to be desired, however they should all be picked up through the re-licensing process and if their security does not meet the current legislative requirements they quite rightly should be required to upgrade their security, but the "sledgehammer" approach employed in these draft guidelines is not the way to get onside with the vast majority of law-abiding responsible licensed firearms owners.</p>

**I am opposed to both your draft documents, in main because it appears you are trying to make guidelines and requirements that go beyond what is legally required under the Arms Act and relevant Regulations.** The correct process if you believe that there are deficiencies in the current legislation, or if you want new items included in that legislation is to follow the legislative process which would allow the wider scrutiny of both parliament and the general public in what you are proposing.

A simple example of what I mean is the requirement in your "guidelines" for the "cabinets of stout construction" to be affixed to the building in which they are housed in, on two surfaces. This is not a requirement of either the Act or the Regulations as they currently stand. I will allow, that under Regulation 19 (c), "taking **reasonable** steps to ensure that a firearm is secured against theft", could include, for small one or two gun cabinets that could be easily carried by a single offender, the reasonable requirement that they are secured in such a way that they cannot be carried away/transported easily by a single person.

However, in the case of larger stand-alone steel or wooden cabinets, (of stout construction of course), that cannot be carried or transported easily by a single offender; your requirement I believe far exceeds what is required by law! My own steel cabinet is secured to the wall, but would fail your guidelines as it is only secured on one surface. Most commercially available Gun cabinets and safes are pre-drilled for attachment on one surface only. Your insistence on two surfaces is just another example of the "over the top" approach you appear to have taken with these guidelines. (Another example would be a friend's steel gun safe that stands without attachment to any wall on the floor of his garage. It took a small forklift to get it in to the garage. In my mind he more than meets the requirements of the legislation, but would fail your guidelines.)

In your proposed guidelines you attempt to introduce a definition of "stout" in relation to wooden cabinets that I believe is unworkable. Your intention presumably is to ensure that a wooden cabinet is able to withstand attack from common hand-tools found in a normal Kiwi Garage by an opportunistic offender. With the current range of cordless power tools that most Kiwis now have in their garage, or even a simple axe or crowbar, the majority of wooden cabinets would fail your time based test. Once again if this is an issue with wooden cabinets that you have found in recent crimes involving the theft of firearms then you will have the evidence to present to Parliament and have the regulations changed to clearly define "stout", even if that means the majority of wooden cabinets will no longer be suitable. But at least by following the proper process and using a fact

based approach the general public will have an opportunity for comment and Parliament will make what changes it deems acceptable and necessary to the Regulations.

Good guidelines must be both understandable and enforceable. A poor example of this in your proposed guidelines would be the requirement that where a cabinet is secured to a wooden floor, (given that I feel this need to secure exceeds what is legally required anyway - sorry to labour the point), the bolts must be secured with a backing plate or heavy washers under the floor to prevent the bolts being pulled through. Please explain how your staff will check that this complies, without cutting a hatch in floor to look, or crawling under the building?

I note also that you appear to be trying to divide "A" category firearms into separate categories within the "A" category and assigning different levels of security to different types of "A" category firearms. Once again I believe you go beyond what the current legislation allows, and if you think this is required please go through the correct legislative process and get the Act and regulations changed through a transparent and public process, backed by facts.

In summary:

My apologies for the tone of this submission but I am disappointed in what is proposed here, and disheartened that my own firearms security, in a stout steel cabinet, secured to one wall, in a building that is alarmed, security which I believe exceeds what is currently required by NZ Law, would apparently fail both sets of your proposed guidelines!

I am not against simple, easily auditable guidelines that comply with the law. I would love to see some workable, lawful proposals from you, backed up by some hard facts concerning firearms thefts and how offenders have been able to breach different types of security.

I am also not against the NZ Police proposing changes to the regulations and/or Act and allowing scrutiny and comment by both the Public and Parliament, especially where there is demonstrable, fact based, need to have the legislation changed.

My major concern is that it appears you are attempting to make binding guidelines that in a number of areas exceed what is actually required by NZ Law. This will simply lead to litigation and a waste of both Police time and resources, as well as the continued reduction of goodwill with the responsible law-abiding licensed firearms community.

	<p>I apologise once more for the random nature of these comments, but I have not had sufficient time to make a more structured response, nor address each draft in more detail. There are undoubtedly positive aspects to these drafts and also what you are trying to achieve is undoubtedly positive, but I believe there is still a way to go.</p> <p>I hope that you will return to the drawing board and engage in some meaningful dialogue with the wider firearms community, circulate the facts around firearm thefts to show the basis for what you want, then either make submission to Parliament to change the Act and/or regulations, or make a more balanced and workable set of guidelines.</p> <p>Once again thanks for the opportunity to comment.</p>
98	<p>Here we go again. Between police, politicians, so called professors, journalists and (other) gun haters, the mindless attempts at subjugating licenced firearms owners are now almost a daily occurrence. All the while our illustrious judges relentlessly smack our worst criminals with wet bus tickets.</p> <p>There seems to be a state of emergency with this latest round of police instigated battering, as we have essentially been given a generous full week to make a submission. Nuff said on that. I will shine a light on a few issues I have with the proposed firearms security policy proposal.</p> <p>Police tacitly intend to reclassify A-cat Semi-Automatics into a non-existing category, equal to MSSAs. This by dint of demanding storage requirements equal to those of MSSAs, and well and above those of other A-cat firearms. It requires little imagination to see where this is going.</p> <p>One of the more insidious suggestions made is the requirement for my already existing and compliant E-cat safe to be inside a strong room. I live in a small two-bedroom house. Would I now be expected to renovate the second bedroom into a strong room? At what expense? What if I rented the house? I doubt the landlord would be particularly obliging.</p> <p>Another sinister trick is the requirement for us to sign a contract in agreement with their policy. This would be another step to granting the police power that they do not legally have. I have a firearms licence. I own firearms that comply with the scope of my licence and endorsement. I use my firearms in a legal and safe manner. There should be no need for any contracts. I don't recall signing a contract in agreement with the Road Code upon receiving my driver's licence.</p>

99	<p>In general, I approve of a drive to improve firearm security, and firearms owners should take responsibility in this respect. There are, however, a number of concerning points in this approved document.</p> <p>New Zealand is currently experiencing record house prices. This means that an increasing number of firearms owners are only able to rent a property, especially the younger generations. Whilst owners need to take responsibility for their guns, they are also likely to be concerned about the ever-present risk of a general house burglary where they will lose other precious items such as jewellery, cash and valuable electronic equipment such as laptops. Therefore, they are going to be making sure their house is secure as possible. However, it needs to be understood that in some cases modifications specified are simply not possible in a rented property. No one should be penalised because they cannot afford a house in the current climate, and Police should not have the ability to remove the ability of someone to partake in sporting activity, or possibly paid employment, on these grounds, <u>as long as all reasonable steps have demonstratively been taken</u> to ensure the highest possible security of the premises.</p> <p>Mr Nash, as Police Minister, it is up to you to ensure Police follow up burglaries, and as a Member of Parliament you should be pressing the Ministry of Justice for harsher punishment of burglars. Those that steal firearms should be served a minimum five or ten year sentence, with strictly no parole before this point.</p> <p>Any underhanded attempts to restrict the use of sporting, hunting or commercial (eg pest control) firearms is not fair on the law abiding. Restrictions on legally owned firearms do not, and never will, impact on criminal use. This is clearly demonstrated in the UK where the number of crimes involving firearms in England and Wales increased by 27% to 6,696 in the year ending June 2017. Criminal use of firearms, like drug misuse, will never be eradicated from human society as those that will to have them will always be able to obtain them by criminal means.</p>
100	<p>By now you would have received hundreds of email submissions from concerned shooters regarding the police's draft document on firearms security.</p> <p>Unfortunately it appears as though police have felt that they have the authority to operate outside of the parameters of the arms act. This is most prominent in their attempt to arbitrarily impose different security requirements for A category semi-automatic rifles - clearly there is no provision for this to happen under the arms act, it is legal fiction and unenforceable. I fail to understand what made them think that it was a good idea to try this, especially considering the High Court has told them that they have no authority to determine what is and is not an A category firearm, let alone invent a new sub category outside of the Arms act.</p>

	<p>I also take issue at the time we have been given to place feedback - effectively one week. This is simply not enough time to respond appropriately to such a serious issue. Many also question the legitimacy of the process being undertaken.</p> <p>Some passages in the latest draft are poorly worded. One of the issues raised by endorsed firearms license holders, is the concern that we will need to have a compliant safe, fixed inside of a strong room. This would result in extremely onerous conditions being placed on endorsement holders, many, especially those who live in rental properties, would be unable to comply.</p> <p>Please note that we are not opposed to firearms being secured against theft or unsuitable persons. Firearm security is taken very seriously by most licensed shooters. However we feel that we are constantly being targeted for problems that don't stem from our sports and hobbies. The overwhelming majority of firearm incidents are perpetrated by unlicensed people - many of whom are repeat offenders, career criminals, some on parole. Clearly there are questions to be asked of our corrections and judicial system. I am yet to see any initiative that actively targets criminals and criminal firearm use and possession.</p> <p>I was impressed by your willingness to meet with shooters in Napier to discuss our concerns and I hope that you can endeavour to sort this particular issue out. We as responsible shooters are keen to be part of the solutions as opposed to being perceived as being the problem.</p>
101	<p>The firearms laws in New Zealand have been very stable since about 1990 when the last major revision was undertaken. The majority of law abiding firearm owners are compliant with the laws and understand and are willing to comply with the current rules. We see this compliance in the large number of firearm licences held and the very low rate of firearms crime and firearms accidents in New Zealand.</p> <p>The warning I would raise to you around these new storage problems is that you are risking alienating a big chunk of these firearm community by increasing the storage requirements when there has been no parliamentary mandate to increase the required security.</p> <p><b>Issues:</b> I was going to go section by section through the document but will summarise the points I want to stress:</p>



**The documents aim seems to be to have firearms hidden away.** Ie not be seen.

Where is the justification of not allowing guns mounted in gun racks above fireplaces or visible in a room?

Where is the justification in having a locked semi auto security cabinet inside another locked room?

**Where is the requirement from to have a separate class of gun licence for A Cat semi-automatics?**

The Police have no idea on how many of these firearms are out there, and you risk a public backlash similar to the E Cat change in 1992. I would suggest that there may be over 200,000 A cat semi-automatics in New Zealand at present. Shooters who are law abiding now may well just hide those firearms if you make the storage requirements too severe.

**Where has the requirements to strengthen the wooden storage cabinets come from?**

After 25 years of compliance, the shooters are not going to support the strengthening requirements when the law has not changed. Especially if there is no backup rise in crime or burglary to justify the added security being asked for. And why are the police proposing the banning of storing A Cat semi autos in a wooden box? Where has the requirement for a 10 minute stress test come from? The rule of thumb in the past has been that a child or casual burglar cannot access a firearm in a secure storage without utilising tools.

**How are the police even going to know if a shooter has got an A Cat Semi auto?**

As I have said above, you risk shooters rebelling and hiding their semi autos outside their 'official' gun cabinets - potentially in a less secure manner, and potentially also having these firearms move into a black market.

**Why are we being asked for a steel box for A Cat Semi-Automatics?**

There has been no law change to call for this.

**And why are we being asked to accept that over a five and ten year period that all wooden firearms storage boxes are to be replaced by steel cabinets?** Where has this mandate come from?

**How are the Vetting Officers going to know if a shooter needs a lesser or higher storage box if they hold no firearms at the start?**

	<p>There is no corresponding registration of A Cat Semi-Automatics, and no database to confirm what level of security is required.</p> <p><b>Why are we following the British Firearms Security requirements when there is no justification in crime statistics to show that this increased security will make New Zealand a safer place</b></p> <p><b>Conclusion:</b>  As I have said above, the risk you now take should you apply this draft Safe Storage Policy (especially with no parliamentary mandate to support it) is that you will potentially lose public credibility and support for the police firearms staff and potentially the police in general.</p> <p>In 1992 there was widespread resistance to the E cat category, and only about 5000 (of an estimated 60,000) military style semi-automatics were registered. Even now there are only 8000 E Cat firearms registered.</p> <p>You risk widespread noncompliance on a much larger scale and over a much wider range of shooters should you persist in creating this new A Cat Semi Auto Class, and increased storage security.</p> <p>I would be suggesting that the police assign their resources to other more pressing criminal issues in the NZ society rather than harassing law abiding firearm owners with these increased requirements that are not going to achieve your stated aim.</p>
102	<p>I wish to present this e-mail as my submission on both the April 2017 and November 2017 draft documents published on the New Zealand Police website titled <i>Secure Storage Requirements for Firearm Licence Holders</i>. To commence with, I must voice my strong objection to the extraordinarily short timeframe in which submissions have been sought and the thoroughly inadequate communication regarding the entire process (including publication of an erroneous feedback e-mail address that was not corrected until well into the submission timeframe).</p> <p>That as a firearms licence holder of well over a decade - whose full contact details have been held on file by the Police for the entirety of that time - I only found out about the proposals via a coincidental stumble upon a Facebook post a few days before submissions closed, speaks volumes about the inadequacy of communication with the community upon whom additional financial and personal burdens are proposed to be placed. In fact, I have only just finished work</p>

and am typing this with less than two hours before submissions close; without the time to fully digest and respond in full to the draft documents, I can only present my objections specifically to those areas which would impact me directly - being the proposed alteration to wooden cabinet storage requirements for A-Cat firearms, including semi-automatic rimfire. In the same vein, I am constrained to present this submission in the less than ideal bullet point format which follows.

I strongly object to the proposals to specifically require such cabinets to a) be constructed from 16mm or thicker plywood (both drafts), b) be bolted to a structural house frame (both drafts) and c) their ineligibility to be considered safe storage for a .22 calibre semi-automatic rifle (November draft), for the following reasons:

- There is no logical reason why any other form of timber of a specified thickness should not be considered a suitable construction material. As anyone who has worked with timber will attest, hardwood, MDF, chipboard and other compressed fibre materials are imminently harder to cut (saw) than plywood. If the intention of Police policy is to present a determined burglar with the most difficulty in gaining access to a locked storage device then specifying "plywood" is overly prescriptive methodology which in fact offers a lesser level of security than many existing cabinets made of the aforementioned materials.
- For many of us who are not financially well-off, we are dependent on rental housing and landlords to maintain a safe roof over our heads. We may simply never be in a position to own our own homes. As such, requiring household intruder alarms is unreasonable and bolting our cabinets to floors/studs/dwangs would more often than not be an impossibility without breaching tenancy conditions and damaging the property. Police need to appreciate the holistic nature of firearms ownership in our changing housing environment - firearms owners such as myself are willing to do as much as we can to secure the items we have a financial and personal investment in but we also do not have endless pockets and free reign over modifications to our houses.
- A semi-automatic rimfire rifle is in no logical way, shape or form in the same category as an MSSA or other E-Cat firearm and therefore require more stringent security requirements such as a steel cabinet. There is no doubt that a recklessly used .22 can cause severe harm and potentially death but so can a .17 bolt action; they are not criminally desired "shoot-em-up" gangster weapons but instead are the recreational rifles used for small pest control, safe firearms handling tuition and leisure (an increasingly rare and treasured commodity). They fire small, low velocity rounds and are one of the few affordable rifle options for those of us on restricted budgets - budgets that may not stretch

	<p>to a new rifle cabinet and thus force us to give up much valued and appreciated sporting opportunities.</p> <p>I trust this submission will be received in the manner in which it is intended - not simply to object to change for the sake of it but to present the reasons I believe these are not the right changes to make. Given the time constraints for making this submission (and my ability to formulate a comprehensive response at this time of night), I would certainly appreciate the chance to make further feedback on any amended proposed policy/ies that may eventuate.</p>
103	<p>There are numerous problems with this proposed policy change. Among the most egregious is the attempt to effectively create addition categories of firearms that are more heavily restricted than under current A category regulations by treating semi-automatic firearms differently from bolt actions, pump actions, etc. There are already too many categories, and adding new ones will only complicate things further, ensuring gun owners will be confused by, and thus less likely to comply with, these new proposed regulations. A better solution would be to reduce the number of firearm categories by rolling E category into A category, returning to the way things were prior to 1992. There is no need for the category of "Military-Style Semi-Automatics." It serves only to inconvenience and make life difficult for law-abiding gun owners. It has done nothing to prevent crime and should be done away with.</p> <p>Another glaring issue is the attempt to essentially ban the use of gun racks as well as wooden cabinets. While some(not all) wooden cabinets are not up to the task of securing firearms, any well-made steel rack(the likes of which are readily available and inexpensive) is more than adequate for securing any type of long gun. As long as they are securely bolted down, they can be very nearly as secure as most gun safes. Their low cost and ease of installation also makes them a practical and appealing option for gun owners who don't have a lot to spend.</p> <p>Lastly, requiring gun owners to sign a document that essentially states that they will go along with any police policy changes as well as legislation is a dangerous and harmful step. This is a free country so we don't require things like fealty pledges. That sort of thing belongs in the Middle Ages, not in 2017. Gun owners are only required to comply with the applicable legislation, as set out in the 1983 Arms Act, etc. Given the NZ Police's history of attempting to illegally reinterpret laws that they don't think are strict enough (as occurred in 2009), this would be a very ill-advised and potentially harmful move. The police's job is to enforce the existing laws and to keep the community safe, not to try to create laws of their own, or to use policy changes to crack down on law-abiding citizens. The police should have no involvement in the legislative side of government</p>

	whatsoever. Any involvement they do have in that area is a clear conflict of interest and should be stopped immediately.
104	<p>I have recently been made aware of proposed changes to the requirements for the secure storage of firearms, as detailed in the attached document which I will henceforth refer to as "The Document". I appreciate the opportunity to provide a submission and wish to raise the following points:</p> <ol style="list-style-type: none"> <li>1. The time permitted for feedback on the proposed changes from the time The Document was published is unreasonably short and prevents adequate feedback from the community to advise Police policy. I believe the timeframes provided should account for the minimum length of time required by law to settle any [hypothetical] OIA request, given one might be lodged in order to inform a response, plus a reasonable grace period to produce an informed response to draft policies. Rushing consultation through is simply bad practice and reflects poorly on the party seeking feedback.</li> <li>2. The proposed adoption of a single overseas standard (BS 7558) for A category firearms storage paraphernalia (i.e. gun safes) produces a number of issues that need to be properly thought through, and the requirements of that standard should be made freely available (i.e. free of charge as an appendix to The Document) to the public if it is to be written into policy. For a member of the New Zealand public access to this standard comes at a significant and unreasonable cost, at nearly NZ\$200. Additionally, what happens to gun safes that are clearly of acceptable construction but meet the equivalent standards of other markets (e.g. US, etc.)? The Police may wish to consider the following when referring to firearms storage requirements in future policy documentation: <ol style="list-style-type: none"> <li>a. Setting out the build requirements of a gun locker, in plain text, that complies with the wording in the Arms Act 1983 and Arms Regulations 1992 (to avoid any ambiguity in what is required); and</li> <li>b. Listing a comprehensive set of standards that are acceptable for the storage of A-cat firearms, such that an off the shelf product may be checked against that list; and</li> <li>c. Adding suitable grandfather-wording that allows safes that are clearly up to scratch and have been previously approved to continue to be used.</li> </ol> </li> <li>3. I do not believe separation of A category firearms into sub-categories is fair and</li> </ol>

	<p>reasonable, and is at odds with the applicable legislation. While I acknowledge security of firearms is key to preventing their unlawful removal, a solution that doesn't adversely and unfairly affect people who rent should be sought. For those who store their firearms in racks, I believe an engineering solution should be sought to upgrade their storage rather than requiring them to purchase gun safes to store any A-cat firearms (regardless of whether they are shotguns, bolt action or semi-automatic) that they may own.</p> <p>Please feel free to contact me via this email address should you wish to discuss any of the above points.</p>
105	<p><b>FEEDBACK ON THE PROPOSED SECURE STORAGE REQUIREMENTS FOR FIREARM LICENCE HOLDERS</b></p> <p>Federated Farmers welcomes the opportunity to provide feedback on the draft document <i>Secure Storage Requirements for Firearm Licence Holders</i>.</p> <p>The use of firearms is essential in New Zealand rural communities, both as a tool on farms and for hunting and shooting as a recreational pastime. Firearms are commonly used by our members for pest control, humane animal destruction and for recreational hunting and shooting.</p> <p>We support a guideline on the storage requirements for firearms. The current requirements as outlined in the New Zealand Arms Code are unclear and open to interpretation. A clear and consistent approach to firearms storage requirements is desirable and necessary for all stakeholders.</p> <p><b>FIREARMS STORAGE</b></p> <p>The secure storage of firearms is important to ensure that firearms are accessible only to those licenced to use them. Federated Farmers notes and supports the current storage requirements of Regulation 19 of the Arms Regulations 1992. The principals of these regulations are communicated to the public through the New Zealand Arms Code, a common language guide to safe firearms use and storage.</p> <p><b>TRANSITION TO STEEL FIREARMS CABINETS</b></p> <p>Federated Farmers recognises the benefit of transitioning to purpose built steel cabinets for secure firearms storage. We recommend a transition period of ten years for existing firearms licence holders. This would align the new requirement with the current renewal time period for firearms licences and the corresponding security inspection. If this change is implemented, we strongly encourage the consideration of the specifications of the commonly used commercially available firearms storage 'safes' rather than arbitrary requirements about dimensions, steel thickness or similar.</p>

Farmers were faced with similar issues when new requirements for the storage of fuel on farms were put in place by what was then ERMA based solely on tank capacity. These regulations were eventually amended, after a lengthy period, to accommodate the vast majority of existing fuel tanks that were safe but did not meet the proposed legislated requirements that were reached by using stock dimensions rather than considering what was already in common usage.

Consideration should also be given to the likelihood of intruders finding concealed or built in firearms storage. There are many ingenious firearm storage solutions that not only meet the current security requirements but also conceal the storage place in walls, ceilings or large furniture. Arguably this type of hidden storage is often more secure than a standard steel safe bolted in an obvious position in a shed or garage.

**RECOMMENDATION: We support the move to compulsory purpose built steel cabinets for secure firearms storage. We recommend a transition period of ten years for existing firearms licence holders to align with current security inspections. Security assessments should also continue to take into account existing concealed firearms storage, as this may be more secure than a readily accessible steel safe.**

#### **PROPOSED DIFFERENTIATION OF SEMIAUTOMATIC RIFLE STORAGE**

We do not support the proposed differentiation between storage requirements for A category semi-automatic rifles and bolt action rifles and shotguns. This is an arbitrary way of selecting how firearms storage should be determined. It appears to have an undue fixation on semiautomatic firearms and makes no reference to a number of other types of firearms in common usage such as pump-action, lever-action or single shot.

Following the Law and Order Committee report into the illegal possession of firearms the Police Minister decided no change to the status of A category semiautomatic firearms was necessary. On this basis police continue to not differentiate between what types of firearms A category licence holders possess. Without knowing what types of firearms are owned, the benefit of storage rules based on this type of definition are questionable. The proposal to differentiate for storage appears to be based on the now out-of-date recommendations of the Law and Order Committee.

**RECOMMENDATION: We do not support the proposed differentiation between storage requirements for A category semi-automatic rifles and bolt action rifles and shotguns.**

#### **ABOUT FEDERATED FARMERS**

Federated Farmers of New Zealand is a member-based organisation representing farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.

The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

	<ul style="list-style-type: none"> <li>- Our members may operate their business in a fair and flexible commercial environment;</li> <li>- Our members' families and their staff have access to services essential to the needs of the rural community; and</li> <li>- Our members adopt responsible management and environmental practices.</li> </ul>
106	<p>Having read through the revised security proposals today I am concerned that making a distinction between semi-automatic and other types of A category firearms would be in breach of the Act which does not differentiate between the mechanisms of these firearms.</p> <p>I am also concerned that the proposed changes, and any further specifications additional to what is already in the act, would place additional costs on Licence holders, and in some instances make it impossible to comply for economic reasons or due to living arrangements. I consider this to be prejudicial and unreasonable. No consideration seems to be given to different peoples living arrangements i.e. renters may not be able to meet these specific conditions, but by other methods their security may still be effective and acceptable under the act as it stands.</p> <p>Also some thought needs to be given to the use of the firearms themselves. Is it reasonable that a Licence holder has to meet this higher standard when they may have the licence for employment reasons (such as a farm hand) and never have the firearm stored in their possession? Or when required to store a firearm by their employment once a year when the boss is away? If security is a condition of procuring a Licence then to be fair it needs to have a minimum reasonable standard that can be easily achieved.</p> <p>In my view security should only be a requirement for a Licence if a firearm is to be stored at home. If you intend to borrow a firearm when you want to use it or only use the firearm at work why do you need security to get a Licence?</p> <p>It may be necessary to store firearms away from home when travelling, and some licence holders may have several premises where they will be storing a firearm, such as a Bach, holiday home or farm. You may also have to store temporarily at another residence as it is unlawful to leave a firearm unattended in a vehicle without either being in possession of it, or meeting the building security standards. There could be many reasons it is preferable to meet the building security standard. Again, for this reason the standard needs to be easily achieved.</p> <p>Why this drive for extra security anyway? It is clear from statistics that there has been no big increase in firearm thefts. A cynic would say this is being used as another way of dissuading</p>



	<p>people from obtaining a firearms licence.</p> <p>No level of security is a guarantee that guns won't get stolen by organised criminals, but the standards already applied in the act do stop the casual thief and their misuse by children.</p> <p>In my view it would be more effective to focus on increased penalties for firearms thefts and the unlicensed use of firearms, as statistically there is a high level of recidivism with criminals. Please punish the criminals rather than the law abiding.</p>
107	<p>The current police firearms regulations appear to be adequate in most cases. A determined thief could gain access to stored firearms from almost any situation but the vast bulk of opportunistic intruders would be put off by safes or strong rooms meeting current rules.</p> <p>Consideration should be given to cost; while stronger and better safes or strong rooms may look good on paper, many shooters may not be able to afford them. Police should not be seen trying to force people out of shooting (either target shooting or hunting) by imposing onerous regulations.</p> <p>The majority of shooters support police and have no wish to see their sport linked in any way to crime. It would be unfortunate if unnecessarily taxing rules reduced shooting to the "elite" sport for the rich it is in some nations.</p>
108	<p>I am writing to you in response to feedback for the November 2017 draft Secure Storage for Firearm Licence Holders.</p> <p>Firstly, thank you for the opportunity to provide feedback to you. I have reviewed your document and note that there are some proposals that are significantly different to what is allowed by the current regulations including a move away from racks and wooden cabinets as well as what seems to be an attempt at the re-classification of 'A' category firearms into 2 categories being 'bolt action and shotguns' and 'semi-automatic'.</p> <p>I have several points to raise with these draft changes:</p> <ol style="list-style-type: none"> <li>1. Whilst I am lucky enough to have my own house, this could significantly affect those in our community who are renting and unable to comply with such requirements due to landlord restrictions and the costs associated with making these changes. My understanding is also that an attempt to phase out racks and wooden cabinets for 'A' category firearms by this method is unlawful as both are expressly allowed by the current regulations.</li> </ol>

2. I have noticed that there is a paragraph that says from date, all non-endorsed firearms to be installed in a steel safe that is Xmm thick, with Xmm unspecified.
3. Whilst having an 'A' Category licence I ensured I over spec'd and installed an 'E' category approved safe and bolted it into my concrete floor with 4 securing points as well as multiple securing points into the wooden house frame (as i wanted to ensure my safe was well and truly above the specification required), what happens for those owners if the specification of Xmm released is higher than their current approved steel safes / cabinets. This could mean significant costs in re-working to an approved solution of whatever the unspecified Xmm ends up being. In my case, if it were to end up being higher than the current 'E' Category safe that i installed, I would need to angle grind all of the bolts out, remove the safe (which by itself weighs a significant amount, purchase a new safe and then attempt to re-install with different fixing points as the existing fixing points would not be able to be re-used. This would be significantly challenging and cost prohibitive (especially if i was to damage the concrete floor as i would be required to drill new securing holes).

1. I am unable to understand why the attempt at re-classifying 'A' category firearms into two 'A' categories. For 'A' category license holders, there are stringent restrictions around the features of semi-automatic rifles including restrictions around magazine capacity which limits the user in the number of rounds that can be loaded into a magazine and fired.
2. In my view, this makes the 'A' category semi-automatic no more 'dangerous' than a bolt action or shotgun. It is a limited capacity 'sporting type firearm'.
3. Again, the current regulations do not distinguish between 'A' Category bolt action, shotgun or limited feature / capacity semi-automatics - these currently all fall under the 'sporting type firearms' category. I would strongly oppose such a move to re-classify 'A' category firearms into two segments as it looks like you are trying to do.

I have also noticed that the draft would require 'endorsed' steel safes to be installed in a room of stout construction, which is also currently contrary to what the current regulations require. Again this could mean significant and unrealistic costs and modifications for some licence holders who may not be able to comply due to not having a room within their dwelling that would satisfy these requirements.

	Thank you for your time. I appreciate the ability to be able to provide feedback to your draft and welcome your comments.
109	<p>I have held my firearms license for 40 years now, i store my firearms in a steel safe that is bolted to the concrete floor and wall also and have stored them like this for 30 years, and it is not a problem.</p> <p>I think all gun owners should have steel safes, i have lived at rural properties that have been burgled 3 times, and no guns were taken thanks to proper storage.</p> <p>Plywood boxes with catches and padlocks are not good enough in this day</p>
110	<p>Good afternoon team</p> <p>I have had the follow feedback from NRANZ Councillors</p> <ol style="list-style-type: none"> <li>1. Page 6 regarding fixing of steel cabinets – Why the requirement to fix an A category Steel cabinet to two surfaces. If done correctly one surface should be sufficient</li> <li>2. No problem with light weight steel cabinets like clothing lockers being unacceptable</li> <li>3. The images shown of acceptable steel cabinets are probably of E-Cat safes and images of acceptable A Cat safes should also be shown that would carry say 2/3/4/5 guns</li> <li>4. Pleased that the steel cable or Chain and lock are not mentioned, maybe they should comment that they are now unacceptable.</li> </ol> <p>That's all from us.</p>
1	<p>Below is a generic email, which you have probably received multiple times....and rightly so: another example of Police misbehaviour is occurring...under your watch (now).</p> <p>Note - this has not been forwarded to the Police, as they DO NOT MAKE THE LAW as is made clear below... and has already been discussed!!</p> <p>Please take this seriously - licensed FAL holders are not the problem, yet Chris Cahill (irrespective of what you may think of him - he is a proven liar), continues to vilify some of the most vetted people in society.</p>

	<p>Please do not let Police "policy" usurp Government's powers - Police are there to enforce the law - not create it...they do not even have the power to create common law (which in itself needs attention given some of the poor sentences handed down to VIOLENT offenders....)</p> <p>I don't feel like I speak for myself when I say that licensed FAL owners are sick of being vilified in the media, please correct me if I'm wrong: no other "hobby/sport" group is subjected to the same persecution (scrutiny would ordinarily suffice - but look at Cahill et-al's comments...)!! Please put your personal feelings aside for the Police Union - they are more myopic than Mr Key was in the Sky City fiasco - Cahill has eroded any good faith the Police Union had in his constant and one-eyed approach.... Please feel free to contact me if any of this needs further clarification.</p> <p><b>FOUNZ Document also attached.</b></p>
2	<p>I wish to provide my feedback on the two proposed documents as detailed below. But I must firstly express there is a clear need for firearms security to be both consistent and reasonable, with guidance documents such as this remaining within the definition of the Arms Act. Unfortunately, both of these documents have failed on all counts and in my opinion, require a drastic rewrite. As part of my professional role I write safety standards and clarity along with reasonably practicable goals are keystones to writing useful documents.</p> <p><b>April document</b></p> <ul style="list-style-type: none"> <li>• Page 3 – section 3.1 – racks are also available as a steel strap or bar arrangement that is padlocked together securing the firearm to a rigid surface, cables are not always essential to secure the firearm.</li> <li>• Page 4 – section 3.2 – define locking system that is compatible with overall strength of the cabinet. 1, 2 or more padlocks etc.?</li> <li>• Page 5 – section 3.3 – lock and hinges, not all types are defined here and statement that consideration by Arms officer is again vague.</li> <li>• Page 6 – additional security options – is this still part of section 3.3 or should be inclusive for all security options? As these are options then the guidance needs to state firearms licence holders should or may also do the following. These are not obligatory and in some cases not possible so cannot be part of the police assessment for suitable security.</li> <li>• For 3.1 to 3.3 – it is better to describe what you are trying to prevent and leave it to the applicant to demonstrate the cabinet achieves this the difference between steel and</li> </ul>

wooden cabinets should only be the construction material. Hinges, sizes, locking and securing methods should be the same.

- Page 7 – section 3.4 – why have different requirements for classes of firearms? Make them all the same clearer standard, again what is the goal? BS7558 is an excellent method to determine resistivity.
- Page 8 – section 3.5 – make hinge and locking requirements the same for wood or steel. Why not have 3mm as the standard if it achieves the goal of withstanding an attack.
- Page 9 – section 3.6 – why have an engineer or locksmith confirm compliance, if minimum construction methods are clearly stated. It is then a simple checklist for the person checking security that the method of security meets or exceeds the minimum standard. Why have two surfaces for security, this should be based on number of fixing types ie 6x 10mm bolts or screws that would provide the required resistance to force. An allowance for weight should also be made as large bank type safes (that weight 500kg or more) are physically impossible to move without heavy lifting equipment.
- Page 9 – general security – is this for endorsed firearms or for A cat as well? Needs to separate out as suggested additional guidance for all firearms. See bullet point 4 above.
- Page 11 – section 3.8 - An allowance for weight should also be made as large bank type safes (that weight 500kg or more) are physically impossible to move without heavy lifting equipment.
- Page 17 – section 3.13 – why is it necessary to receipt an applicant has received a copy of the guidance? The fact they do or do not receive Police approval for security means they have met the guidance stipulated.

#### **November document**

- Page 4 – firearm racks – item1 &2 – remove these comments - the isolation of A cat semi-automatic firearms is not in the Arms Act and all types of A-cat firearms are to be treated the same.
- Page 4 – firearm racks – item 3 & 4 – no mention of walls, this is the primary method of securing racks. Remove reference to concealed location and locking door mechanisms. Racks are an efficient method of securing firearms in some situations which is the primary requirement.
- Page 4 – wooden cabinet specifications – see comments to April segments referring to using BS7558 as the method of defining construction methods to withstand attack. Certainly, define a minimum construction that will achieve this, such as hinges/ locking mechanisms but bear in mind alternative methods will also meet or exceed this. Remove

	<p>comment to excluding semi-automatic A-cat firearms, concealed locations and rooms they are in to be of stout construction and room doors to have locking mechanisms, this is not a requirement of the Arms Act and not a requirement for Police to assess against as part of that act.</p> <ul style="list-style-type: none"> <li>• Page 5 – steel cabinets – use BS7558 as the method of defining method of construction to withstand attack. Suggestions of construction and fastening to walls etc. in this document are misleading and alternative methods are far more efficient. Remove note on converted clothing lockers as these could meet requirements if locking mechanisms are added.</li> <li>• Page 6 – transition period – this is not compliant with the Arms Act as racks/cabinets made of wood or steel are permitted and as stated earlier in the document the only time security is to be assessed is on application, renewals and change of address.</li> <li>• Page 6 – additional requirements to BS7558 – not required as the process to withstand attack are clearly defined and it is up to the manufacturer to determine how that is achieved. Remove comment of thickness of steel and welding of seams.</li> <li>• Page 7 – endorsed licence holders – cabinets or strong rooms or rooms of stout and secure construction should be compliant to BS7558. No need to state minimum thickness requirements of steel as it has been proved that 3mm steel with withstand attack if constructed properly. The rooms that cabinets etc. are in to be of stout construction exceeds the requirements stipulated in the Arms Act so remove any reference. I believe the word buildings has been used throughout when room should have been used. No mention of safes being acceptable nor weight requirements.</li> <li>• Page 13 - Regarding the “contract” at the end this should just be a receipt to acknowledge that the applicant has received the document, licenced holders are only bound to comply with the Act and Regulations not this document, which is only a guide.</li> </ul>
3	<p>The rule / law for gun storage is more than adequate for the job, it is intended for :</p> <p>A) the regular thief B) curious children C) time for an irate owner to calm down</p> <p>These cabinets are already inspected by police and approved if passed then a licence is issued or not for the use, purchase and storage of guns. If the storage unit is not up to standard it's up to police to say so at the time. People who don't own their own homes have difficulty with land lords not wanting holes and fixings placed in their houses, this can be an issue as this happened to my son. He was required by law to have a secure place for his firearm in his flat and the land lord</p>

	<p>refused the attachment of a safe so to comply with present law installed a chain around a roof truss and padlock to lock it up. While it complied with the law he did not ever use nor was he allowed to use my address and my storage facilities when living nearby coming in at early hours to access the gun safe after a trip away would not be a problem. However the present law is not always practical but it is useable if we make it harder the criminal will be harder also if he can't break into your house when you are not there and get your guns, he will wait till you are home and hold a knife to a family members throat, it's just gone from burglary to possible murder, criminals are not restricted by law it only affects the law abiding and they are not the problem.</p>
4	<p>I know your cut off day for submissions was 1 Dec but I only received the email a few days ago as I have been away hunting.</p> <p>I am a firearms licence vector with Christchurch Police (12 years) and prior to that a Police Officer for 18 years.</p> <p>I have been for years fighting for better security arrangements and trying to get firearms licence holders to improve their security.</p> <p>I must say the 2017 version of the amendment is superior to the first version, but would be even better if the wooden box security arrangement be deleted altogether. Anyone keeping any amount of firearms like those firearms pictured should be using a metal safe, not mucking around with wooden boxes.</p> <p>If possible I would suggest deleting the wooden box altogether and reducing the gun rack size down to a maximum of two firearms. The "4 "gun racks are real easy to break off the wall, I know as I do it all the time.</p>