



The British Shooting Sports Council



ANNUAL REPORT

2019

BRITISH SHOOTING SPORTS COUNCIL

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Contents

	Page
Foreword	2
The Council's Officers	3
Association Representatives	4
Abbreviations used in the text	5
Overview of the year	6
Airgun Sports Trust	6
Antique Firearms	6
Appeals against S5 Refusal	6
British Shooting Sports Council meetings	7
Commonwealth Games 2022	8
Criminal Use of Firearms Themed National Advisory Group	8
European Firearms Pass	9
FACE	9
Firearms and Explosives Licensing Stakeholder meeting	9
Firearms (Amendment)(No. 2) Rules 2019	9
Firearms Regulations 2019	10
Firearms Security Handbook	10
Lead in Ammunition	10
Marking of Firearms	11
Medical involvement in firearms licensing	11
Membership	12
Miniature rifle ranges	12
Offensive Weapons Act	13
Open General Licences	13
Practitioners Group	14
Prohibited persons, discharge of S11(6) organisers' responsibility	14
Sentencing Council consultation on firearms offences sentencing guidelines	15
Thames Valley Police stakeholder group	15
Trophy Hunting	15
World Forum on Shooting Activities	16


Cover picture: UK shooters competing in the 2018 .50 Calibre World Championships, New Mexico. Image courtesy of FCSA.

FOREWORD

The British Shooting Sports Council entered 2019 with important unfinished business. Despite the Home Secretary's decision, late in 2018, to withdraw the Government's proposed ban on high muzzle energy rifles, the Offensive Weapons Bill was still very much alive in Parliament at the start of the year, and it was the turn of our supporters in the House of Lords to address the Bill's remaining stages and to finally secure the future of .50 calibre target shooting. Even if we unfortunately lost the battle on MARS and Lever-Release rifles, the fact that a ban on .50 calibre shooting was averted was down to close co-operative working between our member associations, careful analysis of flawed briefing by our opponents and persuasive argument on our part – a good example of how, through pooling resources within BSSC, shooting sports can benefit.

Elsewhere, some of the more intractable issues remain unresolved. What was already an unsatisfactory situation regarding medical involvement in firearms licensing only worsened as, in the absence of Statutory guidance, individual Chief Constables adopted their own approaches to the subject, creating a patchwork of policy across Great Britain. In September the Home Office held a full consultation, but at the end of the year there had been no response by the Government. We are still waiting.

We know also that there is work to be done to secure .22 target rifle clubs and ranges and on other pending issues from antiques to airguns, while the uncertain future of lead in ammunition touches all aspects of shooting. The ability to achieve consensus within the BSSC remains vital.



Jonathan Djanogly MP

Chairman

THE COUNCIL'S OFFICERS

PRESIDENT	Vacant
VICE-PRESIDENT	Martyn Jones
CHAIRMAN	Jonathan Djanogly MP
VICE-CHAIRMAN	Martyn Jones
TREASURER	Bill Harriman
SECRETARY	David Penn (to March) Graham Downing (from March)

“The aims and objectives of the Council are to promote and safeguard the lawful use of firearms and air weapons for sporting and recreational purposes in the United Kingdom amongst all sections of the community.”

(Extract from the Constitution of the Council)

ASSOCIATION REPRESENTATIVES

ASSOCIATION OF PROFESSIONAL SHOOTING INSTRUCTORS	Chris Miles
BRITISH ASSOCIATION FOR SHOOTING AND CONSERVATION	Bill Harriman TD
COUNTRYSIDE ALLIANCE	Jack Knott (to March) Sam Carlisle (from September)
CLAY PIGEON SHOOTING ASSOCIATION	Iain Parker
DEACTIVATED WEAPONS ASSOCIATION	Barry Johnson
FIFTY CALIBRE SHOOTERS' ASSOCIATION	Scott Wylie
GUN TRADE ASSOCIATION	Simon West
HISTORICAL BREECHLOADING SMALLARMS ASSOCIATION	Derek Stimpson
INSTITUTE OF CLAY SHOOTING INSTRUCTORS	Malcolm Plant
MUZZLE LOADERS' ASSOCIATION OF GREAT BRITAIN	Chris Smith (to February) Jon Harper-Smith (from February)
NATIONAL RIFLE ASSOCIATION	Andrew Mercer
NATIONAL SMALLBORE RIFLE ASSOCIATION	Ken Nash (to March) Ali Aitken (from March)
PREPARATORY SCHOOLS RIFLE ASSOCIATION	Mary Eveleigh
SPORTSMAN'S ASSOCIATION OF GREAT BRITAIN & NORTHERN IRELAND	Savvas Toufexis
UNITED KINGDOM PRACTICAL SHOOTING ASSOCIATION	Adam Rowsell (to September) Alex Moreton (from September)
CO-OPTED MEMBERS	Jim McAllister David Penn (from April)
HONORARY LEGAL ADVISER	Mark Scoggins

ABBREVIATIONS

ACC:	Assistant Chief Constable
AFEMS:	Association of European Manufacturers of Sporting Ammunition
AWG:	Ammunition Working Group of FACE
BASC:	British Association for Shooting and Conservation
CCTV:	Controlled Circuit Television
DEFRA:	Department for Environment and Rural Affairs
DTI:	Department of Trade and Industry
ECHA:	European Chemicals Agency
EFP:	European Firearms Pass
EU:	European Union
FACE:	European Federation of Associations for Hunting & Conservation
FELWG:	NPCC's Firearms and Explosives Licensing Working Group
FCC:	Firearms Consultative Committee
F&GP:	BSSC's Finance & General Purposes Committee
GP:	General Practitioner
GTA:	Gun Trade Association
HSE:	Health & Safety Executive
LR:	Lever Release
MARS:	Manually Actuated Release System
NABIS:	National Ballistics Intelligence Service
NCA:	National Crime Agency
NGO:	Non-Governmental Organisation
NPCC:	National Police Chiefs' Council
NSRA:	National Small-bore Rifle Association
REACH:	EU Registration, Evaluation, Authorisation and Restriction of Chemicals
RFD:	Registered Firearms Dealer
SAC:	Special Area of Conservation
T&R:	BSSC's Technical & Research Committee
TVP:	Thames Valley Police
TNIAG:	Themed National Independent Advisory Group
UN:	United Nations
VAA:	Vintage Arms Association
WFSA:	World Forum on Shooting Activities

ANNUAL REPORT 2019

Overview of the year

Politically, 2019 was overshadowed by continuing deadlock over Brexit, with the failure of Theresa May's Government either to conclude a deal or to leave the EU with no deal, her subsequent resignation and the election of a new Conservative leader in Boris Johnson, and a December election. Virtually all other Parliamentary business was pushed to the margins, including resolution of matters important to shooting sports such as medical involvement in firearm licensing and implementation of both the Offensive Weapons Act and remaining provisions of the Policing & Crime Act such as antique firearms. Imminent departure from Europe did not deter Government from implementing into UK law additional elements of the revised EU Firearms Directive due to an imminent and substantial non-compliance fine. During the year, BSSC strengthened its relationships with the police and other law enforcement agencies through its Practitioners Group and through stakeholder meetings. Groups opposed to live quarry shooting turned to the use of crowd-funded legal challenges in their attempts to disrupt pest control and the release of gamebirds.

Airgun Sports Trust

With the threat of airgun licensing in England & Wales still pending, the Gun Trade Association and the Airgun Manufacturer & Trade Association felt that more must be done to improve public perception surrounding air weapons and to promote safe, legal and responsible behaviour amongst airgun users. An Airgun Sports Trust was therefore set up to emphasise the importance of safe airgun use, to promote secure airgun storage and to encourage responsible airgun ownership, especially among new airgun users.

Antique firearms

The Policing & Crime Act 2017 amended S58(2) of the 1968 Act with regard to the definition of an antique firearm. However, following discussions with technical experts, the Home Office had not yet laid any Statutory Instrument defining those propulsion/ignition systems, cartridges and chamberings which could be regarded as obsolete, and the date prior to which a firearm is antique. Circumstances had evolved and particular criminal armourers who had supplied antique firearms and ammunition were now behind bars. The Home Office further reviewed the definition and announced that they were also considering adding a definition covering air weapons which may include air, gas and CO₂. However, by the year end, no legislation was yet in sight.

Appeals against S5 refusal

In December, BSSC discussed the possible need of a mechanism for an appeal against Home Office refusal to grant or renew a prohibited weapon authority. The Secretary sought guidance from the Hon Legal Adviser, who suggested either extension of the Crown Court's jurisdiction under S44 of the 1968 Act to refusal of a S5 authority; or the establishment of a stand-alone appeal process for s.5 refusals, whether through the Courts, by way of reconsideration/review within the Home Office, by an independent body or by some other entity. Both options would require primary legislation. The Secretary discussed the matter with Home Office officials, who

agreed to review FCC reports from the past and look at recent Home Office papers on the topic. It was agreed that S5 matters should be addressed at a future meeting.

British Shooting Sports Council meetings

Meetings of the Technical & Research Committee and Finance & General Purposes Committee took place on February 14, 2019. There were discussions on the forensic identification of certain .32 pistol designations as antiques, medical evidence with regard to firearms licencing, the status of the European Firearms Pass after Brexit, measures to improve airgun safety and security, the Offensive Weapons Bill and its impact on high energy rifles, the updating of the BSSC website, the Ivory ban, the Commonwealth Games, a FACE/WFSA workshop on lead in ammunition and HSE Explosives guidance.

At the Annual General Meeting on March 21, 2019, Jonathan Djanogly MP was re-elected as Chairman, Martyn Jones as Vice-President and Vice-Chairman and Bill Harriman as Treasurer. Jim McAllister was co-opted to Council, as was the retiring Secretary David Penn in recognition of his enormous contribution to the work of BSSC and the ongoing advice that he was able to offer. At the Council meeting which followed the AGM there were discussions on the Offensive Weapons Bill, medical evidence, the upgrading of Home Office technology and lead in ammunition. At David Penn's last meeting as Secretary, the Chairman voiced the profound thanks of the Council to David for his work over the past 13 years and for his dedication and diligence. His words were warmly applauded by the meeting and there was a presentation to David at the BSSC Annual Luncheon at the Army & Navy Club immediately after the meeting. Graham Downing assumed the role of Secretary with effect from the close of the AGM.

On May 2, 2019, a meeting of the Technical & Research Committee had discussions on its future policy towards the exemptions for miniature rifle ranges which existed under S11(4) of the Firearms Act, GP involvement in firearms licensing and the discharge of the responsibility of clay shoot organisers in respect of prohibited persons. There were additional discussions on forthcoming Government consultations on Statutory Guidance to the Police under the Policing & Crime Act 2017 and 'Firearms Safety', a consultation expected to encompass both the security of high energy rifles and a range of other matters related to the control of firearms. There were reports on the marking of firearms and component parts required by the EU Firearms Directive, the setting up of the Airgun Sports Trust, the insurance of private vehicles carrying ammunition, the Commonwealth Games and the revocation by Natural England of three Open General Licences for the control of certain wild birds following a legal challenge by the campaigning group 'Wild Justice'.

At its meeting on July 18, 2019, Council discussed the reorganisation of its method of working. The distinction between matters considered at Council and those addressed by the Technical & Research Committee had over time become blurred. With all members now being appointed to both principal Committees, it was felt that there was no longer any need for separate T&R or F&GP Committees and that all BSSC meetings should, with effect from the next AGM, become meetings of Council. It was accepted that, given his Parliamentary commitments, Jonathan Djanogly would not be available to chair the additional number of Council meetings and that a Deputy should be appointed. The role of the Practitioners' Group was also readdressed in the light of the resignation of Roger Arditti following his appointment to a new role within the Metropolitan Police. There were reports on a national firearms stakeholders' group meeting

at Durham Police HQ, the policy of Thames Valley Police in relation to medical verification of applicants for shotgun and firearm certificates, and the updated Firearms Security Handbook.

On September 19, 2019, a meeting of the Technical & Research Committee agreed a detailed response to a Home Office consultation on Statutory Guidance to the Police under the Policing & Crime Act 2017, focusing particularly on medical verification in relation to firearms licensing. The meeting also considered in detail a report of a meeting of the FACE Ammunition Working Group in preparation for an ECHA focused consultation on the proposal to restrict the use of lead in all ammunition. There were additional reports on the Home Affairs Committee Inquiry into Home Office preparations for Brexit, changes in the regime which required importers to mark firearms, and the WFSA meetings in Banff, Canada.

At its meeting on October 24, 2019, Council approved a detailed submission to the FACE Ammunition Working Group in advance of an ECHA consultation on lead in ammunition, looking in particular at target shooting and those aspects of shooting sports which were lacking alternatives to lead. There were reports on a meeting on October 8 at Portcullis House to discuss future policy in relation to miniature rifle ranges and S11(4), and the Firearms Security Handbook. An application for membership was received from the Vintage Arms Association.

The Council meeting on December 5, 2019, saw detailed consideration of new Statutory Instruments on the declaration of deactivated weapons, marking requirements and security of firearms held by those under 18. There was further consideration of a proposed BSSC response to the ECHA consultation on the prohibition of lead in all ammunition and fishing weights. Council heard reports on a DEFRA consultation on Trophy Hunting, a consultation by the Sentencing Council on firearms offences sentencing guidelines and the potential for appeals against the refusal of a S5 prohibited weapon authority.

Commonwealth Games 2022

The Chairman attended a meeting convened by the Sports Minister, Mims Davies MP, to discuss the Birmingham 2022 Commonwealth Games. He voiced both BSSC's general concern as to the initial decision not to include shooting sports in the Games and then its specific concern at the delay in the appeal process. The Chairman asked whether the Minister would lobby for and support the inclusion of shooting in the Games, not least given the historic importance of the sport and the ready provision of facilities at Bisley. While not implying that she was against shooting's inclusion in the Games, the Minister merely responded that she "supported all sports." In June, the Commonwealth Games Federation reaffirmed its initial announcement that shooting sports would not be included in the Games, for the first time since 1970.

Criminal Use of Firearms Themed National Independent Advisory Group

The BSSC Secretary and Hon Legal Adviser both participate regularly at meetings of the TNIAG. This body hears national strategic assessments by NABIS and NCA of the threat of criminal firearms use and offers advice on ways in which criminal possession and use may be reduced. Criminal firearms usage had levelled out over a three-year period at some 590 discharge incidents per annum and was decreasing slightly. The use of converted blank firers had declined steadily but shotgun use had increased, and it appeared that shotguns were taking the place of converted blank firers in criminal hands. Shotgun use now represented 45% of criminal

discharges. Thefts of shotguns were significant and there was no room for complacency over security by certificate holders.

European Firearms Pass

The European Firearms Pass is an international firearms 'passport' which facilitates travel with firearms by certificate holders and which assists British police forces in issuing Visitors Permits to inbound shooters travelling from outside the UK. Its future in Britain was cast into doubt as a result of the decision to exit the EU. Government indicated that police forces would continue accepting EFPs as evidence in support of an EU citizen's application for a Visitors Permit, but no assurances were made over any future arrangements for the issuing of EFPs to UK certificate holders. Following a request for clarification, the Home Secretary wrote on May 8 that the Government expected to reach a deal with the EU and in doing so would look to maintain access to the system of European Firearms Passes. This statement was greatly welcomed by the UK shooting community but was of questionable value in the event of 'no deal'. In August the Home Affairs Committee held an Inquiry into Home Office Preparations for Brexit, to which BSSC responded with detailed evidence of the value of the EFP to UK shooters and the rural economy. It highlighted the fact that other non-EU states such as Switzerland, Norway, Iceland and Liechtenstein all operate the EFP, so its termination is not mandatory on leaving the EU. BSSC urged the UK Government to follow suit and continue issuing the EFP.

FACE

BSSC continues to play an active role in FACE UK, the UK grouping of the European hunting associations' umbrella organisation. The Secretary is in addition a member of the specialist FACE Ammunition Working Group. BSSC acknowledges that since European policy will continue to affect the UK in the long term, active liaison with European partner associations after Brexit, when political representation in the EU institutions ceases, is of particular importance. The Secretary attended FACE UK meetings in March and July, when the FACE Director General set out his workplan and there were detailed discussions on lead, the revised EU Firearms Directive, General Licences and the hunting of migratory birds. The Secretary attended a FACE ammunition workshop on lead in Roskilde (Denmark) a FACE/WFSA workshop on lead in Brussels and an AWG meeting in Brussels.

Firearms and Explosives Licensing Stakeholder meeting

Ten BSSC associations plus the Secretary were represented at a stakeholder meeting called by ACC Dave Orford, Chair of NPCC FELWG, at Durham Police HQ on June 6. There were discussions about medical screening and service standards. Police representatives expressed their concern about the unlicensed access to firearms offered by the S11(4) 'miniature rifle range' exemption and there were useful exchanges on land permissions and firearms fees.

Firearms (Amendment)(No. 2) Rules 2019

On October 1 the Home Office circulated a draft of a Regulation requiring that, where a certificate holder is under 18 years of age, a person aged 18 or over (usually the parent or guardian) is to assume responsibility for secure storage of the firearms and ammunition. A 'dual key' arrangement was deemed acceptable in situations where the parent or guardian is not a certificate holder. In addition, the Statutory Instrument amended the particulars of a firearm to be entered in dealers' registers. Effectively this required all essential component

parts of firearms (except historic firearms) to be marked with specified information. The object of the Statutory Instrument was to transpose into UK law new requirements set out in Article 4 and Article 5(a) of the revised EU Directive.

Firearms Regulations 2019

On October 1 the Home Office circulated a draft of a Regulation regarding deactivated firearms. The proposed new legislation was designed to make it an offence for a person to fail to notify the appropriate national authority of his possession of a current specification deactivated firearm, or to fail to notify transfer of it to another person. In issuing the draft, the Home Office maintained that it was necessary to transpose this requirement of the revised EU Directive into UK law in order to avoid infringement proceedings and a large fine. BSSC argued that the legislation would be unnecessarily burdensome upon the many thousands of people who possess deactivated firearms. It was of no public safety consequence, it would serve no purpose other than to satisfy the EU Commission, and it would be widely ignored. Moreover, the precise detail of which deactivations were caught by the new legislation was initially unclear. BSSC sought confirmation from the Home Office, and this was duly received to the effect that only those firearms deactivated on or after 14 September 2018 needed to be notified. Firearms which were deactivated prior to 8 April 2016 are not covered by the legislation. A Home Office circular outlining these changes was published in December.

Firearms Security Handbook

This Home Office/BSSC/NPCC joint document had previously been published in 2005 but had been updated by NABIS and was submitted to BSSC for approval. The Secretary registered concern over proposed requirements for fitting tracking devices to vehicles, verification of older security cabinets, mandatory CCTV for shop fronted dealers and the insertion of a cartridge retention scheme into the handbook. NPCC agreed to delete these areas of concern, and in the light of that, BSSC approval to the text was given. Subsequently BASC raised additional concerns about a requirement for alarms and storage of S2 ammunition. These again were raised with NPCC and were under discussion at the end of the year.

Home Office technology

The Secretary, Secretary Designate and Deputy Chairman attended a meeting in March at the Home Office to discuss the proposed digitising and upgrading of technology associated with firearms licensing as part of a Government-wide approach to the application of technology to Government services. The object of the meeting was to assist the Home Office with an internal report which would identify options that can be addressed through technology. It would not necessarily look at changing the legislation but would address how technology can better support the service role. Subsequently the Secretary and Deputy Chairman provided input to a hands-on trial of the Metropolitan Police Service's new online system for firearm and shotgun grants and renewals.

Lead in ammunition

The future of lead-based ammunition in shooting sports was under renewed scrutiny at both national and international level. An EU Regulation under the REACH process was anticipated which would prohibit lead ammunition over wetlands and there was lobbying from the European hunting and ammunition manufacturers' umbrella groups FACE and AFEMS to

amend the definition of wetland so as to remove dry blanket bog and to restrict the prohibition to use of lead ammunition on wetlands, as opposed to its carriage. It was anticipated that, irrespective of Brexit, an EU Regulation would almost certainly apply to the UK, and BSSC wrote to the Environment Secretary, Theresa Villiers, detailing its concerns. Meanwhile, however, the European Chemicals Agency ECHA was moving towards a general ban on lead in ammunition and fishing weights. The Secretary attended workshops on lead in ammunition in Rome in February, Roskilde (Denmark) in May and Brussels in October and November.

For the preparatory phase of the restriction proposal on all lead in ammunition, ECHA proposed to open a focused consultation lasting for two months. It was expected that this would seek answers to a range of technical questions regarding information on suitability of lead alternatives, industry impacts, compliance issues, effects on ecosystems and remediation costs. The consultation opened on October 3 and closed on December 16.

The focus of ECHA's investigation was the risks posed by lead to the environment and wildlife as well as risks to humans through consumption of game meat, and on October 24, BSSC Council considered a draft submission to a meeting of the FACE Ammunition Working Group. This included detailed appraisals on the potential impact on each individual branch of shooting sports using data provided by BSSC member associations. Particular concern was expressed about the effect upon those sports where no viable alternative existed, such as historic and muzzle-loading firearms, rimfire and small calibre centrefire rifles and air weapons. A consultation response highlighting these concerns was filed with ECHA on December 12.

Marking of firearms

Revision of the European Firearms Directive necessitated the introduction of new marking requirements for firearms, by which every essential component, i.e. barrel, cylinder, bolt, slide, frame, upper/lower receiver would have to be marked with its country of origin, company of manufacture, type/model, serial number and date. A multi-organisation meeting at the London Proof House called to consider how these requirements might be enacted in national law noted that firearms manufactured before September 1939 would not require additional marking, while the timing within which imports to the EU were to be marked was yet to be agreed. The UK was to report back to Europe by January 2020 regarding the steps taken.

Concern was expressed in September that DTI was proposing to allow importers only 28 days to mark imported weapons, including those intended for deactivation, despite the fact that the EU Directive merely stated that marking had to take place prior to sale. Clarification on the precise nature of marking requirements came in October with the publication of a Statutory Instrument but other questions, including the timescale in which marking was to be carried out, remained unresolved.

Medical involvement in firearms licensing

The verification of applicants' medical information in the licensing of firearms, the fragmentation of policy amongst police licensing departments and the continuing lack of guidance from Government remained a central issue within the work of BSSC during 2019.

During the passage of the Offensive Weapons Bill, an amendment tabled by Lord Shrewsbury had successfully manoeuvred the Government into promising a consultation on medical evidence at the start of the summer recess. Subsequent to this, the Chairman wrote to the

Home Office Minister outlining BSSC's concerns. At a meeting with officials on March 13, the Home Office confirmed that firearms licensing medical procedures would be addressed in the forthcoming Statutory guidance to be issued under the Policing & Crime Act 2017, the intention being that medical exchanges would be between the police and the GP rather than between the GP and the applicant. Meanwhile, a number of police forces in England & Wales were proposing to move to a position where no certificate would be issued without a medical sign-off or application accepted without a completed GP proforma.

Council debated its position on the various aspects of the medical issue. It agreed that its preference was for a simple 'tick-box' style of verification by the GP. There was acceptance that there should be some reasonable medical fee, but that this should be proportionate to the statutory schedule of firearms fees paid to the police. It was felt that fear of liability lay behind much of the reluctance of GPs to engage with firearms licensing and that, were the text of preamble 12 of the revised EU Directive – which specifically absolved the medical profession of liability – to be written into UK law, then this fear could be addressed. The enduring marker was fully supported.

These were the planks of a detailed BSSC response to the Home Office consultation on Statutory guidance to the Police which was launched on July 23 and which ran until the end of September. BSSC stressed the very low level of danger to public safety posed by those who possess lawfully certificated firearms in Great Britain, but noted that the failure of the 2016 guidance had led to a highly unsatisfactory patchwork of approaches by different firearms licensing departments across Great Britain. BSSC welcomed the confirmation by the Home Office that responsibility for initiating a medical check should continue to lie with the police rather than the applicant; it sought much greater clarity in the nature of the medical check itself; it recommended a Statutory duty upon GPs to become involved with the firearms licensing process; it recommended the determination of a standard national medical fee by way of negotiation between Government, the police, the medical bodies and the shooting associations; and it commended the medical marker as a cornerstone of the medical verification process, prompting as it did the continuous monitoring of the certificate holder and opening the way to a 10-year certificate.

At the close of 2019, BSSC still awaited the Government's response to the consultation. Meanwhile, a succession of England & Wales police forces continued to depart from the 2016 guidance on medical verification, leading to an increasingly confusing patchwork of licensing across Great Britain.

Membership

BSSC Council considered and approved an application for membership from the Vintage Arms Association. It was agreed that the VAA would be admitted to membership with effect from January 1, 2020.

Miniature rifle ranges

There had been growing acknowledgement of the close scrutiny which was being focused by Government upon the exemption at S11(4) of the Firearms Act 1968 whereby persons operating a miniature rifle range are permitted to acquire and possess firearms and ammunition without a certificate. The matter was explored by BSSC on May 2, when the Secretary introduced a

discussion paper suggesting the need to validate persons seeking to operate miniature rifle ranges. A Home Office team had visited both Bisley and Harrow Rifle Club, where they had been briefed on the workings of S11(4) and miniature rifle clubs in general. There was discussion on whether it might be more appropriate to validate the person operating the range or the range itself, and it was agreed that a focused meeting should be held on the subject. This was convened by the Chairman at Portcullis House on October 8, at which NSRA agreed to submit a paper putting forward its own proposals.

Offensive Weapons Act

The year opened with the Offensive Weapons Bill still very much alive in the Parliamentary timetable. As well as introducing new restrictions on knives, the Bill had initially sought to prohibit 'high muzzle energy' firearms such as the .50 calibre rifle and 'faster firing' rifles operating on the MARS and Lever Release systems. During 2018 the proposed prohibition of high muzzle energy rifles had been dropped by the Government during the House of Commons stages of the Bill as a result of significant Conservative backbench opposition. When the Bill moved to the House of Lords at the start of 2019, BSSC worked closely with supportive Peers to secure this position. At Grand Committee, Labour amendments which would have reintroduced the .50 calibre ban were withdrawn and Lord Shrewsbury spoke eloquently in support of shooting sports. Responding to the debate, the Minister of State (Ministry of Defence) Earl Howe confirmed that the Government was not seeking to ban high energy rifles, though these should be subject to the highest standards of security. He said, however, that the Government was not impressed by the argument that MARS or Lever Release rifle types were required by disabled shooters and that the Bill would therefore prohibit civilian access to these more rapid firing rifles. Compensation would be offered for MARS/LR rifles and ancillary equipment surrendered to the police, but it would not extend to those rifles which were converted to S1 or deactivated.

The Offensive Weapons Act received Royal Assent on May 16, with the future of .50 calibre target shooting secured, subject to a review over firearm security, for which BSSC expressed its warm thanks both to Sir Geoffrey Clifton-Brown and Lord Shrewsbury. However, a ban on around 2,200 MARS and Lever Release rifles currently in lawful possession had been confirmed. The Secretary entered into discussions with the Home Office regarding surrender and compensation arrangements for the banned firearms, with a scheme expected to be announced in early 2020.

Open General Licences

On 23 April, Natural England had revoked three Open General Licences which permitted the killing and taking of certain 'pest' bird species, following a legal challenge by the group 'Wild Justice'. The revocation had been undertaken with no prior warning or consultation with shooting, land management or farming organisations or with the police, and had led to chaos amongst farmers and gamekeepers over continued maintenance of pest control. Chairmen and chief executives of the main stakeholder groups, including BASC and the Countryside Alliance, had written to the Environment Secretary and had undertaken a conference call with Natural England. Meanwhile a number of MPs, including the Chairman, visited the Secretary of State.

After dismay from shooting and countryside bodies at the subsequent issue of two very restrictive licences for control of carrion crow and woodpigeon, the Environment Secretary

took matters into the hands of Defra and a new suite of three more satisfactory licences were issued for the control of avian pests. However, concern still remained about the ability to control pests in and around SACs and Natura 2000 sites.

During the autumn, Wild Justice issued a further challenge over the legality of rearing and releasing gamebirds on or near European protected sites.

Practitioners Group

The BSSC Practitioners Group met on March 26, with Roger Arditti (Metropolitan Police) in the chair. For the Home Office, Graham Widdecombe spoke of forthcoming consultations on firearms matters, including Statutory guidance on medical verification, and said that Ministers were keen to learn any lessons from the tragic shootings in Christchurch, New Zealand. It was noted that further measures were required to transpose the revised EU Firearms Directive into UK law. There was a useful exchange of views on medical screening, in which police representatives referred to a groundswell of frustration within FELWG at the time taken by Government to provide Statutory guidance. Forces were now creating their own systems. On the positive side, a number of forces were adopting online applications, and three online systems were now live. There was a discussion on the need to provide receipts for seized firearms, which must be correctly identified and then properly cared for. Speaking for Police Scotland, Ewan Henderson outlined a pilot scheme for ceasing to undertake home visits on renewal, he spoke of the tightening up of Visitor Permit procedures at airports and said that automatic pistols with interchangeable magazines and revolvers with more than two shot capacity would no longer be permitted in Scotland.

The meeting on October 23 was chaired by Derek Stimpson, Roger Arditti having moved on within the Metropolitan Police. His successor, Inspector Chris Downs and Inspector Neal Bickford of Durham Police and NPCC were welcomed to the Group. For the Home Office, Graham Widdecombe reported that 11,000 responses to the Government's consultation on Statutory guidance had been received and that it was hoped to have a fairly generous buy-in scheme for MARS and Lever Release rifles operating in the early part of 2020. Statutory Instruments on deactivated firearms, young persons (security of firearms) and marking requirements had been issued. In a discussion on the Statutory guidance consultation it was noted that NPCC was of the view that the onus should be on the applicant to supply medical information, a position that was contrary to the view expressed by BSSC. For the GTA, Simon West said that the area around RFD servants was still very unclear and in conflict with an RFD's duties under employment law. It was agreed by all that the Practitioners Group is a valuable forum for the interchange of comments and information, and it was suggested that attendance by both NABIS and NCA could prove valuable. It was agreed that the group should meet six-monthly, and that the Chair would rotate annually between BSSC and the Police.

Prohibited persons, discharge of S11(6) organisers' responsibility

There is no requirement in law for any particular action to be undertaken in order to discharge the responsibility of a lender of a shotgun at a S11(6) event to ensure that the borrower is not a prohibited person. BSSC therefore considered the best way forward for event organisers, noting that if there were to be a signed declaration, then records would have to be kept and there could be data protection implications. It was felt that a prominently displayed notice was normal practice for clubs, any responsibility being then placed upon the individual borrowing

the gun. Notwithstanding this, it was noted that the signatures of attendees to signify that they were not debarred from participation by S21 of the 1968 Act would create a very strong defence in any subsequent Court proceedings.

Sentencing Council consultation on firearms offences sentencing guidelines

In December, BSSC discussed a consultation by the sentencing Council. At the time, there was only one sentencing guideline in place for firearms offences: the offence of carrying a firearm in a public place which was included in the Magistrates Courts Sentencing Guidelines. The Sentencing Council was therefore proposing to issue sentencing guidelines for a number of the most commonly sentenced firearms offences. It was seeking views on the factors that make firearms offences more or less serious. The Secretary discussed the matter with the Hon Legal Adviser, Mark Scoggins, who advised that a response from BSSC was not called for, our interests being in the lawful possession and use of firearms. As an organisation, we would likely take the position that we entirely support stern penalties for their unlawful possession or use, since that stance may well reduce the amount of gun crime (low though it is already) and so make it less likely that further legislative restrictions will be placed on legitimate shooters

Thames Valley Police stakeholder group

Five BSSC associations were represented at stakeholder meetings called by Thames Valley Police in May and November. Chief among the topics for discussion was the verification of applicants' medical information, since TVP had taken the decision to depart from the 2016 Home Office guidance and to require a GP validation letter before they would process an application. It was noted that TVP had made substantial progress in their attempts to smooth out the cyclical peak demand in shotgun certificate renewals.

Trophy Hunting

Environment proposals in the Queen's Speech had included bringing forward legislation to ban imports from trophy hunting, and DEFRA sought input on this topic by way of a consultation. Whilst the Government recognised that trophy hunting can potentially be an effective conservation tool, supporting local livelihoods and attracting revenues for other conservation activities, it had also highlighted concerns. As a result, it was reviewing current controls on the import and export of hunting trophies to understand whether further action was required. BSSC's response maintained that there were already sufficient levels of control to address the conservation of endangered species and that further restrictions which might discourage UK hunters from travelling overseas would damage communities in those areas where large game hunting takes place. Likewise BSSC argued that a ban on all hunting trophies entering or leaving the UK would cause very substantial damage to UK deer stalking, as it would discourage, if not prevent entirely, the flow of visiting hunters to sporting estates across the country. The economic damage to these estates would be very considerable, as would be the impact upon the necessary management of wild deer in the UK.

World Forum on Shooting Activities

The Secretary attended WFSA meetings in Nuremburg (Germany), in March and Banff (Canada) in September. Regarding the UN Arms Trade Treaty, the 5th Conference of State Parties was held in Geneva on August 31, with 104 States involved. Canada had joined, but the US under the Trump administration had unsigned from the Treaty. This meant that US delegates did not attend. The treaty is operating at a \$415,000 deficit and is slowly dying since money is not coming in. The in-kind contribution from Switzerland which is keeping the conference afloat will continue until 2021 and means that the conference will stay in Geneva until then. A sub-group has been set up on transportation issues and a number of NGOs have been addressing shipping companies regarding the illicit diversion of arms away from their intended recipients. While this is the principal focus, the group will also address private transfer of firearms by hunters and target shooters, so there is a potential area of concern for shooting sports. The future of lead in ammunition remains a primary work programme for all WFSA members, and especially those representing European countries, and WFSA co-funded with FACE a workshop in Brussels in November.

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