

# The British Shooting Sports Council



## **EU Public Consultation on firearms**

This EU Consultation Document on a common approach to reducing the harm caused by criminal use of firearms in the EU can be found on

<http://ec.europa.eu/yourvoice/ipm/forms/dispatch?form=ReduceFirearmsRisk>

It is one part of a number of EU firearms-related initiatives, including the ratification by the EU of the UN Vienna Firearms Protocol, the much-publicised comments by EU Home Affairs Commissioner Cecilia Malmström suggesting a link between legal ownership of firearms and illicit trafficking, the preparation of a report by the Commission on possible further amendments to the EU Directive 91/477/EEC on control of the acquisition and possession of weapons and of course the EU's active role in the UN's recent adoption of a text for a Conventional Arms Trade Treaty.

The intention of this consultation is to obtain some appearance of legitimacy for further restrictions on the legal ownership, use and acquisition of firearms by civilians. We may anticipate that organisations opposed to recreational firearms use, hunting or gun collecting will orchestrate large numbers of replies. It is therefore essential that shooting organisations and their individual members complete and submit responses to provide an effective counter-argument and counter-weight. If the majority of responses are supportive of our interests, it would be difficult for the Commission to use public opinion as a reason for seeking further restrictions.

**The deadline for replies is the 17<sup>th</sup> June 2013.**

All the questions have at least some relevance to legal ownership. Most of the questions are biased and are written in a way that seeks to pre-determine the response and push the respondent into agreeing that some EU action is needed even though national legislation on all issues addressed in the questions already exists.

Question C.2 suggests that the list of prohibited firearms should be extended (it is understood that the Commission is referring to semiautomatic rifles and possibly also to semiautomatic shotguns and handguns). Question C.4 pursues the mandatory use of locking devices in firearms. Imagine the impact if this was made retrospective. Question C.7 would provide a justification to introduce compulsory mental health tests and suppress the current derogation that allows people under the age of 18 to hunt and sport-shoot if they have parental

permission or guidance. This derogation was hard-won with Britain taking a leading role in negotiating it. If this were lost it would be a severe blow to the future of our sport. Question C.8 aims at requiring that all firearms and ammunition be subject to authorisation, which would have negative implications not only in countries where there is a formal distinction between authorisation and declaration of firearms but also in countries where there are flexible arrangements for certain hunting firearms. In Britain, it could result in the introduction of tighter controls on shotguns and shotgun cartridges. Question D.2 could result in a general requirement to store firearms in an approved safe. What would happen if the EU specification for a gun cabinet exceeded the British Standard currently the norm in Britain?

**It is not necessary to answer the optional questions that request additional free-text comments (questions B.4, C.11, D.5 and E.6). It is necessary to click on Option 1 in response to *all* the multiple choice questions. While this may seem extreme in some instances, the questions are biased and are designed to elicit your agreement that action by the EU is necessary.**

**If you do decide to make further comments, you may wish to consider referring to the EU principle of ‘subsidiarity’, enshrined in Article 5 of the Treaty on European Union.** This is the principle whereby the Union does not take action (except in the areas that fall within its exclusive competence), unless it is more effective than action taken at national, regional or local level. Civilian firearms control is most appropriately dealt with at national level, given the variety of shooting and hunting traditions among the member states.

**Please follow the following steps:**

1. Go to <http://ec.europa.eu/yourvoice/ipm/forms/dispatch?form=ReduceFirearmsRisk>
2. Choose your language in the icon that is in the upper right part of the screen.
3. Indicate your country, whether you are an individual or an organisation and your name or the name of your organisation.
4. Answer the questions by clicking on option “1” for each one of them. You do not need to answer the optional questions that request additional comments (questions B.4, C.11, D.5 and E.6).
5. After having answered the questions, as a security measure to avoid computer-generated replies, you will have to type in the numbers and/or letters that will be displayed in your screen and validate them.
6. Your answers will have been submitted by then. You can view them and/or save them as a PDF.

Thank you for taking the time to respond to this consultation.

David Penn

Secretary, British Shooting Sports Council

23/4/2013