



The British Shooting Sports Council



# ANNUAL REPORT

## 2023

# BRITISH SHOOTING SPORTS COUNCIL

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**2023**

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Cover picture: Target shooting at Bisley  
Photo: Graham Downing

## FOREWORD

The Council's main purpose is to co-ordinate the views of Britain's many shooting and firearms-related associations in dealing both with Government and the range of official bodies with which it is necessary for us to engage in order to advance the cause of sport shooting. It was therefore pleasing that the year commenced with a meeting with the recently appointed Minister of Policing, Chris Philps MP, to discuss a range of issues including the deregulation of sound moderators and the possibility of extending the duration of certificate life. Such meetings are important. They enable direct engagement with those individuals who are personally responsible for shaping the future of firearms legislation, and provide the opportunity to present the case for shooting sports and lawful gun ownership.

But opinions within Government are equally shaped by the constant engagement of the BSSC Secretary and our many association representatives with civil servants, with the police and with bodies as diverse as the Health and Safety Executive and the National Crime Agency. The meeting in April 2023 with Home Office officials to discuss the response to the Plymouth shootings demonstrated the importance of such engagement. It helped direct Government thinking in ways which struck what I think was an appropriate balance between the reasonable aspirations of over half a million firearm and shotgun certificate holders and the overriding needs of public safety. It showed BSSC working at its best.

The transition to lead ammunition continued to play an important part in the Council's activities during 2023. As an accredited stakeholder, BSSC participated in meetings with HSE over the development of its risk assessment and restriction proposals for lead ammunition and, following the publication of those proposals in October, it acted swiftly and decisively to draw together the views of all of its member associations and to present them to HSE in response to its consultation. The lead ammunition debate remains a difficult one for target shooting in particular, and it is vital that Government understands the need to ensure a transition period which allows for the development of robust supply lines for components such as steel shot and suitable propellants. This is especially the case while continuing conflict in eastern Europe and the Middle East places huge strain on civilian ammunition manufacture and supply.

I was particularly pleased to join our international friends from the World Forum on Shooting Activities when BSSC hosted the WFSA conference in London in September. The importance of international legislation is easily overlooked, and even now that the UK is no longer part of the European Union, we must not forget that initiatives which affect our shooting sports here in Britain can still trace their origins to decisions made overseas and, in particular, treaties signed at the United Nations. We have so much in common with other national shooting organisations, whether in Europe or elsewhere, and our shared participation in WFSA is of value to all of us.



Jonathan Djanogly MP

Chairman

## THE COUNCIL'S OFFICERS

PRESIDENT	The Lord Robathan PC
VICE-PRESIDENT	Martyn Jones
CHAIRMAN	Jonathan Djanogly MP
VICE-CHAIRMEN	Martyn Jones, Derek Stimpson
TREASURER	Bill Harriman (until March) Chris Miles (from March)
SECRETARY	Graham Downing

*"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	James Aris (until July)
	Adrian Blackmore (Sept until Dec)
	Roger Seddon (from December)
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	Jon Harper-Smith (until February) Allan Whiffin (from March)
NATIONAL RIFLE ASSOCIATION	Andrew Mercer
NATIONAL SMALLBORE RIFLE ASSOCIATION	Graham Burns
SPORTSMAN'S ASSOCIATION OF GREAT BRITAIN & NORTHERN IRELAND	Savvas Toufexis
UNITED KINGDOM PRACTICAL SHOOTING ASSOCIATION	Alex Moreton (until May) Richard Clifton (from July)
VINTAGE ARMS ASSOCIATION	Ian Barclay
CO-OPTED MEMBERS	Jim McAllister David Penn
HONORARY LEGAL ADVISER	Mark Scoggins

## ABBREVIATIONS

APP:	Authorised Professional Practice
APCC:	Association of Police and Crime Commissioners
BASC:	British Association for Shooting and Conservation
BMX:	Bicycle Motocross
BSSC:	British Shooting Sports Council
CC:	Chief Constable
CPSA:	Clay Pigeon Shooting Association
CUF:	Criminal Use of Firearms
DEFRA:	Department for Environment, Food and Rural Affairs
EU:	European Union
FACE:	European Federation of Associations for Hunting & Conservation
FEO:	Firearms Licensing Officer
FLD:	Firearms Licensing Department
GP:	General Practitioner
GTA:	Gun Trade Association
HAC:	House of Commons Home Affairs Committee
HMIC:	His Majesty's Inspectorate of Constabulary and Fire & Rescue Services
HSE:	Health and Safety Executive
IOC:	International Olympic Committee
ISSF:	International Shooting Sports Federation
IOPC:	Independent Office for Police Conduct
IWA:	Internationale Waffen Ausstellung (International Firearms Exhibition)
NCA:	National Crime Agency
NFLMS:	National Firearms Licensing Management System
NGO:	National Gamekeepers' Organisation
NPCC:	National Police Chiefs' Council
OEWG:	Open Ended Working Group
PCC:	Police and Crime Commissioner
RFD:	Registered Firearms Dealer
SACS:	Scottish Association for Country Sports
SCA:	Scottish Countryside Alliance
SGA:	Scottish Gamekeepers Association
SHOT:	Shooting, Hunting and Outdoor Trades show
UKPSA:	United Kingdom Practical Shooting Association
UK REACH:	United Kingdom Registration, Evaluation, Authorisation and Restriction of Chemicals
UN:	United Nations
WFSA:	World Forum on Shooting Activities

## **ANNUAL REPORT 2023**

### **Overview of the year**

Much of the Council's work throughout the first part of the year was shaped by the unfolding response to the tragic Plymouth shootings in 2021, in particular the Coroner's report following the inquest into the deaths which occurred as a result of those shootings and its impact on Government thinking and the refocusing of police procedures over the licensing of firearms. This included detailed input to a major consultation on the direction of licensing which was launched in June, and which generated a huge response from the wider shooting community. The development of proposals for a fairer system of firearms fees was also a major strand of activity, although the expected consultation on a new Fees Order did not materialise by the year end. In addition, BSSC actively pursued its initiative to remove sound moderators from certificate controls. Although this received firm support from the police and from the Policing Minister, that support was not accompanied by the opportunity of a vehicle for legislation to turn aspirations into deeds, and by the year end the deregulation of sound moderators remained unfinished business. The same could be said for the proposed restriction on the use of lead in ammunition, which occupied many weeks of work. BSSC's strong international reputation was again boosted in September when it hosted the autumn conference of the World Forum on Shooting Activities in London. This included a dinner at the Farmers Club for our overseas guests and visits to The Proof House and the Royal Armouries collection at the Tower of London.

### **Airguns**

In a move to fulfil commitments made during the 'Firearms Safety' consultation, the Home Office announced that it would be preparing a Statutory Instrument confirming the 'reasonable precautions' which would have to be taken to prevent those under 18 from accessing air weapons. These would include locking the air weapon out of sight when not in use and storing the ammunition separately. It was announced by the Home Office that the new Firearms (Air Weapons)(England and Wales) Rules 2023 would come into force on July 31.

### **Annual Luncheon**

The Council's Annual Luncheon was held at the Army and Navy Club on March 23 following the AGM and was attended by 63 Council members and their guests, who included eight Parliamentarians from both Houses. After lunch, the Chairman spoke about the move to non-lead ammunition, continuing concerns over delays in licensing, the Firearms Bill and work in the United Nations with the World Forum on Shooting Activities. It was generally agreed that the event was a great success.

### **Approved Club Police Liaison Officers**

After contact between the police and Home Office Approved target shooting clubs had fallen away during the pandemic, the Home Office had sought to review arrangements, and a working group was set up in 2022. This group continued in being during 2023, and a further meeting was convened to discuss the role and responsibilities of Approved Club Police Liaison Officers. There was discussion on a number of points, including the notice required for notification to the police of individuals participating in club guest days. Draft guidance was produced by the Home Office and this was commented upon whilst the working group continued in being.

### **Authorised Professional Practice for Firearms Licensing**

The National Police Chiefs Council updated and revised its Authorised Professional Practice for firearms licensing. NPCC published a draft APP which was put out to public consultation, and shooting associations were invited to attend an online consultation meeting on February 16 at which CC Debbie Tedds outlined the principles behind the new document, much of which concerned the organisation and training of licensing departments. It was agreed by the shooting associations that it was helpful to have an updated APP against which licensing departments could be measured, and detailed comments were offered to NPCC. It was pointed out that while firearms licensing involves a balance between, on the one hand, providing a service to an overwhelmingly law abiding and responsible body of more than half a million certificate holders and, on the other, enforcing legislation to ensure that firearms do not fall into the hands of unsuitable individuals, it was noticeable that in the draft document the enforcement elements appeared to take precedence over the service elements. Shooting associations called for a balance which recognised and acknowledged the service provided to a responsible section of the community. The new APP was published in August and circulated to Council members. It provided new and more detailed guidelines for the operation of police licensing departments. Uncertainty in responsibilities within forces had been highlighted after Plymouth and it was now established that forces must be fair and operate a consistent and timely service. Furthermore, forces would need to ensure that they had sufficient establishment to deal with demand from licence holders and from new applicants. It was hoped that this would place firearms licensing departments on a more consistent footing and that it would provide a template against which they could be judged or inspected by HMIC.

### **Bereavement and Referee Guidance**

Police Scotland published a suite of draft guidance documents designed to offer advice to shooters and their families over what provisions to make regarding disposal of firearms after the death of a certificate holder. In addition, a further draft document was produced offering guidance on being a referee or Air Weapon Certificate verifier. These were circulated amongst Council members and comments returned to Police Scotland. It was expected that forces in England & Wales would adopt them, duly modified to reflect the differences in legislation, notably over air weapons.

## **Brian Carter**

The death was announced on June 23 at the age of 88 years of former BSSC Vice President Brian Carter. His knowledge of the shooting world generally, and in particular of the gun trade and the sport of clay pigeon shooting with which he was directly associated through his involvement with GTA and CPSA, was immense. Brian was deeply committed to the sport and through his association with BSSC he was prominently involved in the advancement of shooting sports and the gun trade. A donation to his preferred charity, the Royal British Legion, was made in his memory.

## **BSSC Meetings**

Meetings of Council again alternated between meetings 'in person' at the Farmers Club, and those held by videoconferencing. On March 23 the Council's AGM was presided over by the President, Lord Robathan, and there followed a full meeting of Council at which the BSSC Forward Plan was updated. A meeting of Council was held on May 16 at which the principal business included developments on proposed changes to firearms legislation following the Plymouth shootings, the ongoing review of fees and an upcoming Government consultation on knives and machetes. Meetings of Council were held on July 13 by videoconferencing and on September 7 at The Farmers Club. Discussion at the July meeting focussed around BSSC's response to the Home Office post-Plymouth consultation on firearms legislation, which was scheduled to close on August 23. There was also discussion around the progress of the HSE's publication of its risk assessment on lead in ammunition.

The September meeting dealt with financial matters but also included discussion of media activity around the close of the firearms licensing consultation, a response from the Policing Minister on delays to licensing, consideration of the Government's response to the machetes consultation and a discussion around UKPSA concerns over the inadequacies of current legislation with regard to the lending of S1 shotguns. Meetings of Council were held on October 10 by videoconferencing and on December 5 at The Farmers Club. Discussion at the October meeting included the concept of a training event to assist with current FEO and licensing staff training regimes being developed by the College of Policing. There was also a report on the very successful WFSA conference in London in September. The December meeting gave approval to a BSSC response to the consultation on the HSE Risk Assessment on lead in ammunition and provided room for discussion around further political action on Firearms Fees and the deregulation of sound moderators.

## **College of Policing Training Course**

One of the clear requirement to have emerged from the aftermath of the Plymouth shootings was the need to improve the training of Firearms Enquiry Officers. This matter was specifically addressed by the Coroner. With a new APP now in place and promise of £500,000 in Government spending, the College of Policing put in train the development of a national course and there were discussions with COP representatives to take forward proposals that BSSC member associations could provide assistance with training, particularly by way of providing access both to suitable firearms and also to shooting ranges around the country. A preliminary meeting was held with the College of Policing, at which BSSC offered to facilitate

hands-on experience at suitable ranges. Development of the proposed course continued at the turn of the year.

### **CUF Prevent Board**

The Secretary attended meetings of the NCA's Criminal Use of Firearms Prevent Board in April, July and October. There was discussion over the exact definition of the official description of 'lost' shotguns as cited in the statistical category 'lost or stolen.' Concern was expressed by BSSC that the statistics were bundling shotguns that were administratively misplaced within NFLMS with those genuinely lost by negligence or otherwise, and that this was reflecting unfairly upon shotgun owners. The matter was referred to the Home Office strategic board. While it was acknowledged that the number of thefts of shotguns was low – around 14 per month – it was nevertheless agreed that a shotgun security communications campaign should be launched around the start of the game shooting season. This was supported by BSSC, with the proviso that the wording of any messages surrounding security must be consistent with the Firearms Security Handbook. Messaging was finalised and agreed, and the NCA's publicity programme went ahead. A proposal was made to introduce a pilot RFD surrender project which would engage the assistance of dealers in attempting to remove from circulation some of the many firearms which were of no commercial value. A pilot scheme was developed in Warwickshire and the West Midlands, to be co-ordinated by local forces.

### **Deer legislation in Scotland**

There was liaison with Scottish associations regarding proposals by the Scottish Government to amend legislation regarding deer management. The Scottish Government proposed to repeal close seasons for male deer, to legalise thermal and night vision optics for shooting, and to reduce the minimum bullet weight for shooting all deer to 80 grains. This latter proposal focused attention on the difficulty of attaining the required muzzle energy of 1,750 foot pounds with the new, lighter copper bullets. There was widespread concern by countryside organisations, most particularly to the ending of close seasons for male deer. However, the legislative changes came into effect in October.

### **FACE Ammunition Working Group**

The Secretary attended a meeting of the Working Group on March 30. The new EU Regulation prohibiting the use of lead shot in wetlands had come into force on February 15 and FACE advised its EU member associations to simply inform hunters that the legislation had come into force and that they should be aware that 'wetland shooting' within 100 metres of wetlands with lead ammunition was now prohibited, citing the regulation text and the European Commission's advice. Implementation of the wetlands lead ban saw different approaches in different member states. Some, like Ireland, Finland and Estonia, mapped wetlands. Italy disregarded wetlands adjacent to clay shooting grounds and was written to by the Commission for doing so. Most states did not move forward, as they had an eye on the full ban on lead in all ammunition which was approaching. This new legislation was with the

Commission during the course of the year and envisaged a total ban on lead shot and large calibre bullets within 18 months and a ban on small calibre bullets in 5 years. Clay shooting grounds would require 90% lead shot recovery in order to allow the shooting of lead by elite athletes to continue. Rifle ranges would require bullet traps or sand berms, a roof, a base and water monitoring. However, the new legislation made increasingly slow progress due to concerns that legislation requiring the manufacture of non-lead civilian ammunition would severely affect the supply of military ammunition at a time of extreme international tension. The continuing war in Ukraine and, in October, the launch of a further conflict in the Middle East, contributed to the stalling of the EU decision making processes both on lead ammunition and the proposed authorisation requirement for all industrial uses of lead. Neither strand of legislation made any further progress in 2023.

### **FACE Manifesto**

The Brussels office of FACE launched a manifesto in advance of the 2024 European Parliament elections. It called for all laws and decisions which would affect hunting to be fair, workable and understandable; for flexible implementation of the EU Nature Directives; for Europe's cultural heritage to be respected; for recognition of the role of the hunting community in conserving nature; and re-establishment of the Biodiversity, Hunting and Countryside Intergroup for the 2024-2029 Parliamentary term. MEP candidates of all parties were encouraged to sign the manifesto.

### **Fees**

On April 27 the Home Office published an agenda and supporting costings for a meeting of the Firearms Fees Working Group. After discussions with member associations, the Secretary prepared a full brief for the meeting, comparing the proposed costings with rates of inflation since 2015, when fees were last amended, and challenging changes to assumptions agreed by the Home Office at the 2014 review that costs of enforcement post-grant were 'public good' elements that should not be chargeable. There was a full discussion with Home Office officials on May 3, following which a further internal meeting was convened and a full response was prepared by the Secretary, challenging much of the detail in the Home Office case. In particular, it noted that the timings given for the various licensing operations had increased by an average of 46.84% over the values given in 2014 at the last review, in spite of the fact that increased usage of technology over the intervening nine years should have worked in the opposite direction, to *decrease* the time taken to perform the various operations and make the necessary checks. In short, the operations should have been much quicker than they were at the last review. The response identified numerous inconsistencies in the Home Office working, and while the BSSC response acknowledged the need for a reasonable fee increase, it argued that this should be accompanied both by measures to reduce the burden on the police – such as deregulation of sound moderators – and by an increase in the length of certificate life to 10 years. The response was approved not merely by all BSSC member associations but was supported also by the NGO, SACS, SCA, SGA and Scottish Target Shooting, representing therefore an almost universal view from GB shooting associations. It was anticipated that a consultation on a new Fees Order would begin in the autumn, however, no consultation was published and there was clear frustration from

all quarters over this delay. The Chairman and Sir Geoffrey Clifton-Brown met the Policing Minister to discuss the lack of progress on fees, but a consultation was still awaited at the end of the year.

### **Firearms Act 2023**

Unusually, the Home Office introduced legislation to Parliament by way of a Private Members Bill, sponsored by Shaun Bailey MP, in fulfilment of commitments made following its consultation on 'Firearms Safety'. The Bill sought to amend S11(4) of the 1968 Act to require the operator of a miniature rifle range to hold a Firearm Certificate for the rifles and ammunition. It also sought to create an offence of having intent to manufacture unauthorised ammunition. The Chairman spoke at the Bill's Committee stage on March 15. He stressed the value of miniature rifle ranges in providing target shooting opportunity for Scouts, Cadets, youth organisations, schools, colleges and universities as well as the wider public. He welcomed the fact that the Government was retaining the exemption which permitted non-certificate holders to shoot at such a range. However, he confirmed BSSC's agreement that the operator of a miniature rifle range should hold a firearm certificate and thus be subject to the same checks as other firearm owners. On ammunition, he noted that large numbers of law-abiding shooters reload cartridges to save costs, to improve accuracy and to provide them with ammunition that is not commercially available. He added that viable ammunition requires both a primer and a propellant, and there were already controls on these components. He said that it would remain a matter for the police and the Courts as to how 'intent' to unlawfully manufacture ammunition was to be proven. However, he confirmed that BSSC was satisfied that in the case of lawful shooters reloading ammunition which they had authority to possess, no offence was committed under the proposed legislation. The Bill passed all its Commons and Lords stages and received Royal Assent in September. The Home Office confirmed that it would be bringing forward commencement regulations to take the new legislation into effect, and officials circulated a new draft condition and criteria for inclusion in the Home Office Guide. This covered the safe operation of ranges and the secure storage of firearms and ammunition used. The draft was circulated to BSSC Council members and, following discussion, comments were returned to the Home Office regarding the qualifications of those supervising shooting on 11(4) ranges.

### **'Firearms Safety' Consultation**

The inquest into the 2021 Plymouth shootings concluded on February 20, when the Secretary circulated the Coroner's reports and the associated IOPC report, along with a number of media comments. Although both the Coroner and the IOPC were highly critical of the actions of Devon & Cornwall Police in granting a shotgun certificate to the perpetrator Jake Davison, both voiced the opinion that there should be alignment between the licensing of shotguns and S1 firearms. The matter was discussed at the March BSSC Council meeting and it was recognised that it posed the most serious of threats to shooting sports. The Minister subsequently said that he would be making a statement in early May, and a meeting was arranged by the Secretary with Home Office officials to provide the opportunity for BSSC member associations to present their case. This took place on April 24 and addressed the issues raised by the Coroner, along with those raised by the Scottish Affairs Committee's

inquiry into the Isle of Skye and Wester Ross shootings. Shooting representatives stressed the severe damage that would result both to shooting sports and the gun trade if shotguns were placed on the same legislative basis as S1 firearms and argued that the question of public safety revolved around the suitability of the individual rather than the relative lethality of rifles and shotguns. It was noted that NPCC had already indicated that, in practice, the tests for suitability were the same for shotguns and S1 firearms. BSSC also warned of the huge increase in workload on already hard-pressed FLDs if harmonisation were to occur. BSSC also disagreed with a suggested change in the legislative presumption that a Chief Officer 'shall' grant a certificate.

The BSSC Chairman and Sir Geoffrey Clifton Brown met the Policing Minister, who confirmed that he would be launching an 8 week consultation. This commenced on June 28. Speaking in the House of Commons, the Minister acknowledged that "the vast majority of licensed firearms holders are law abiding and cause no concern," indicating that the Government had decided not to proceed with recommendations on aligning shotgun and S1 firearms legislation or with any amendment to the presumption that a chief officer 'shall' grant a certificate. The consultation considered powers of entry by police, prohibitions from possession, duration of certificate, referees, the Statutory Guidance, medical checks, the digital marker, and firearms phone lines.

Much time and energy was spent refining BSSC's response. The Council opposed changes to police powers of entry, being of the view that the police already had sufficient powers to enter a property when there was a risk to life or the peace. Where there was no such immediate risk, the Chief Officer had the power to immediately revoke a certificate, thus placing the holder in illegal possession. This in turn provided the opportunity for entry. BSSC opposed changes to the system of S21 prohibitions based on the length of custodial sentences, which it regarded as being well understood. It opposed changes to the system of referees, believing that the process of determining suitability for possession of a shotgun would not be made any more robust with the introduction of a second referee, and while it supported the concept of a simple checklist for referees, it warned against any declaration which might suggest that referees were in some way responsible for the decision over whether or not to grant a certificate. On medical matters, BSSC opposed the inclusion of neurodevelopmental disorders in the list of notifiable conditions but supported the concept that GP engagement with the licensing system should be made mandatory and that the digital marker should be made visible to other health professionals than the GP. BSSC strongly endorsed the concept of extending certificate life to 10 years. The consultation closed on August 23, when there was considerable media interest in firearms licensing. Initial suggestions indicated that there had been a very substantial response by shooters to the consultation. BASC reported some 80,000 click throughs from its promotional campaign, and there were many more responses through the email campaigns organised by other associations. The Government had not responded to the consultation by the year end.

### **High Muzzle Energy rifles**

In January the Secretary continued negotiations with Home Office officials over the detail of a Statutory Instrument which would amend the Firearms Rules to impose 'level 3' security requirements on High Muzzle Energy rifles. The Home Office finally agreed to a 6 month transition period to allow FEOs to visit certificate holders and to enable certificate holders to

bring their security up to date as necessary. A Statutory Instrument was subsequently laid by the Home Office.

### **Knives and machetes**

The Government launched a consultation on proposals to ban certain machetes and large knives. BSSC's response focused on the fact that large-bladed tools are important to those undertaking a variety of tasks in rural areas, being commonly used by gamekeepers and shoot managers to clear vegetation and by deer stalkers to cut away twigs and branches to maintain sight lines around high seats. Meanwhile hunters require knives to skin and prepare carcasses. The response noted that it is not the item itself which causes injury or alarm: it is the person using it and the use to which it is put. Thus the focus, as with firearms, should be upon the individual and upon their motive and intent, rather than on the knife or machete. The consultation received a total of 2,544 responses and the Home Office announced its proposal to legislate by banning certain types of machetes and knives which seemed to have been designed not as tools but to look menacing and suitable for combat; to introduce new police powers to seize, retain and destroy lawfully held bladed articles in private premises if the police were in the property lawfully and had reasonable grounds to suspect that the article would be used in crime; to increase the maximum penalty to 2 years imprisonment for the offence of importation, manufacture, sale and general supply of prohibited and dangerous weapons and the sale of knives to persons under 18 years old; and to create a new offence of possessing bladed articles with the intention to endanger life or to cause fear of violence.

### **Lead Ammunition**

It had been anticipated that during February 2023, UK REACH would present its response to the 2022 six month public consultation on a restriction of lead in all ammunition. It emerged, though, that the consultation had generated 2,759 responses, nine times the number of responses that the EU consultation had generated across 27 countries. HSE admitted that it had been overwhelmed, and that restricting lead in ammunition had turned out to be a far larger project than had ever been envisaged. HSE announced that it would be delaying its response for six months. Meanwhile HSE personnel would be visiting clay shooting grounds and rifle ranges in order to gain further understanding of the problem. As an accredited stakeholder, the Secretary, along with a number of other BSSC member associations, attended an online UK REACH Challenge Panel meeting on lead ammunition on March 24 and subsequently responded to HSE. Concern was raised over a comment that ranges with no stop butts could not be used by civilians and the fact that this would eliminate .50 calibre long range target shooting. Data about the 'manufacture' of steel shot in the UK was challenged on the basis that while cartridges may be loaded in the UK, the shot itself was manufactured and imported, mostly from China, and that this had clear implications for supply lines. Assumptions that the annual average personal shooting budget for clay target shooters was the same as for quarry shooters and data suggesting that centre fire rifles for live quarry shooting might be rebarreled 4-5 times a year were challenged.

The August 7 date on which HSE had promised to publish its risk assessment and restriction

proposals for lead ammunition came and went, and on September 13, the House of Lords DEFRA spokesman Viscount Younger of Leckie confirmed that HSE would publish its final opinion on risk assessment and open a public consultation on a separate opinion on socioeconomic analysis in October. The risk assessment and restriction proposals for lead ammunition were finally published on October 11.

The Secretary re-convened the BSSC Lead Working Group, which met at CPSA Headquarters at Bisley on November 2. The meeting considered the questions posed by HSE and in particular the transition period to non-lead ammunition, humane dispatch, the use of different bullets for live quarry and target shooting, and the zeroing of rifles. The Secretary subsequently drafted a BSSC response to HSE. The response stressed the need for sufficient time to be allowed for an orderly transition. In respect of shotgun cartridges, transition would need to take account of the need to allow time for the cartridge industry to import and install manufacturing machinery suitable for loading steel shot cartridges. Furthermore, the transition period would need to allow sufficient time for the development of robust supply lines for components. In this respect it was noted that there were currently shortages of steel shot, which was not manufactured in the UK and which was imported, principally from China, and of double based powders and primers owing to the conflicts in Ukraine and the Middle East. On humane dispatch it was BSSC's view that a derogation was required for this purpose to avoid the risk of ricochet of projectiles off hard ground. Where humane dispatch was required in farmyards, lairages etc on a concrete surface, or where injured deer or other large animals needed to be dispatched on roads following collisions with vehicles, then the shooting of a hard monometal projectile downwards towards the animal's head was likely to result in a ricochet which could endanger the shooter or other people. This risk would be greatly reduced by the use of a soft lead bullet. The response questioned the existence of conclusive evidence for raptor poisoning from lead bullet debris in Great Britain, it identified a range of shooting disciplines in whichunjacketed solid lead projectiles were used, it advised best practice in zeroing of rifles, it warned that some 80 grain copper bullets in .243 did not achieve the statutory muzzle energy for shooting deer either in England & Wales or in Scotland, and it warned that the cost of transition to non-lead ammunition had been underestimated by HSE. The draft was discussed and approved by BSSC Council and formally transmitted to HSE by the Secretary prior to the December 10 deadline.

### **Licensing delays**

Delays in the grant and renewal of shotgun and firearm certificates continued to cause serious difficulties both to certificate holders and the gun trade. BSSC repeatedly raised its concerns both with individual police forces and with NPCC. It also sought to highlight licensing delays with the House of Commons Home Affairs Committee and, with the support of the Chairman, the Secretary briefed HAC member Adam Holloway MP, specifically drawing to his attention the complete suspension of new grants by Hertfordshire police, which had cited the impact of the more robust licensing checks now required under the Statutory Guidance as the reason for its actions. Following this briefing, Adam Holloway tabled a series of Written Questions to the Home Office. In a letter to the BSSC Chairman following a private meeting, the Policing Minister Chris Philp MP acknowledged the importance of firearms licensing applications being handled efficiently and effectively, with forces sharing best practice where possible across licensing departments. The Minister felt that most forces were processing new and renewal applications within reasonable periods of time, but he

admitted that there was a small number of forces where there were delays. He said that he had written to all Police and Crime Commissioners about the importance of an efficient and effective firearms licensing process within police forces, expressing concern about delays and backlogs and the decision by some licensing departments to suspend grants. He also highlighted the small number of homicides involving licenced firearms in comparison to those involving unlicensed firearms and bladed articles.

### **Meeting with the Minister**

Thanks to the good offices of the Chairman and Sir Geoffrey Clifton-Brown MP, a meeting was held with the new Policing Minister, Chris Philp MP, on February 7. It was attended by the Chairman, Sir Geoffrey, the Secretary and BASC Chief Executive Officer Ian Bell. Discussion centred around the Council's proposals for the deregulation of sound moderators, growing concern over delays in the grant and renewal of firearm and shotgun certificates, and the possibility of progress towards a 10 year certificate, focusing principally on GP involvement in the licensing process. There remained an aspiration to move towards longer certificate duration. However, this would be dependent upon the extent to which GPs were prepared to engage with the placing of an enduring digital marker on the medical records of certificate holders to ensure that if a patient presented in future with a medical condition which raised concern, the firearms licensing department could be informed.

### **Olympic Games**

There was further concern over the future of shooting events at the Olympic Games, with IOC again considering dropping shooting sports from the Olympics in an effort to make room for new disciplines. ISSF met the IOC in Lausanne, Switzerland, to discuss the matter. The real problem was the continuing low visibility of shooting events and their appeal compared with other new attractive sports such as Skateboard and BMX freestyle, which had much more TV airtime and audience appeal.

### **Planning law and target shooting**

At the beginning of June the Scottish Government opened a consultation in respect of a change in planning laws. The Scottish Government sought views on proposals to remove an exemption which allowed temporary use of land for up to 28 days per calendar year without planning permission for fixed targets on shooting ranges. While the proposed changes would not affect clay target shooting, the potential impact on other shooting disciplines operating fixed targets on temporary ranges, in particular Practical Shooting, made it important to bring the consultation to the attention of the target shooting associations. The consultation remained open until August.

### **Police Partnership Summit**

The Secretary was invited to speak in a panel session at the APCC & NPCC Police Partnership

Summit at the Queen Elizabeth II Conference Centre on November 15, alongside speakers from the Home Office, NCA and NPCC. Speaking to an audience of senior police officers and PCCs, he said that BSSC member associations supported a fair but robust licensing regime which enabled shooting sports to continue whilst ensuring public safety so far as is humanly possible. He said that police training needed to be addressed. Lack of training and consequent police failure was central to the Plymouth shootings, but now that a new APP had been published, it needed to be accompanied by good quality training managed centrally by the College of Policing. He fully endorsed both the medical checks introduced in 2021 and the digital marker on certificate holders' patient notes, but he expressed BSSC's concern that there was no legal requirement for a GP to place the marker.

### **Practitioners Group**

At a meeting of the BSSC Practitioners Group on March 28, BSSC member associations were briefed by Home Office officials on the data gathering exercise associated with the Firearms Fees review. There was discussion about the ongoing Firearms Bill at which concern was expressed by BSSC members over the clause regarding ammunition reloading. However, the meeting was reassured that the new legislation was not a backdoor way of introducing controls on ammunition components. The Home Office was considering the Plymouth Coroner's reports and the IOPC report, along with the Scottish Affairs Committee report into the Isle of Skye shootings. The jury had found catastrophic failings by Devon & Cornwall Police and the Government had been criticised for not taking forward Lord Cullen's recommendations on police training. The Coroner had called for alignment of shotguns and S1 firearms, the updating of mandatory prohibitions and firearm seizures, police training, and a reversal of the presumption in favour of grant. The IOPC had also called for alignment of shotguns and S1 firearms and suggested that autism should be a declarable medical condition. The Scottish Affairs Committee had called for alignment of shotguns and S1 firearm legislation, a wider adoption of advice on the mental health of certificate holders and a mandatory role for GPs. In its briefing to BSSC member associations, NPCC acknowledged that some forces still had delays and backlogs. Eight forces had been highlighted as giving particular cause for concern, though two of these had now improved their performance. Police training had been highlighted in the Plymouth inquest and there was now absolute necessity for consistency, which was still lacking. Options were actively being considered with the College of Policing, which was looking at validation of police firearms licensing departments to achieve reassurance that licensing was being delivered effectively.

At a further meeting on October 11, BSSC member associations were briefed on the post-Plymouth public consultation, firearms fees, sound moderators, medical markers and the updating of NFLMS. There was then a police update on delays in grant and renewal of certificates. All forces were now starting to address the use of S7 permits and while some forces were still using them to deal with delays in renewal, the number of permits was going down. However, it was acknowledged by police that in a few force areas grants were taking 24 months or more, and that grants had been affected in consequence of the reduction in the use of temporary permits. Forces had been asked for their projections and staffing requirements over the next 12 months and 7 forces had real issues with delays and acknowledged that an increase in the fee would imply a demand for better service. NPCC had asked forces to provide quarterly performance data, and BSSC member associations urged that such data was made public. Uncertainty in responsibilities within forces had been

highlighted after Plymouth and it was now established that forces must be fair and operate a consistent and timely service. Strategic demand assessment was important, and forces needed to ensure they had sufficient establishment to manage their demand. The meeting was updated on a new FEO training course to be operated by the College of Policing. A paper was presented by UKPSA on the lending of S1 shotguns, which did not sit within the Act in relation to lending at clubs. Forces had adopted different procedures, which had caused confusion, and it was acknowledged there was a need to address the anomaly in order to assist target shooting.

### **Scottish firearms statistics**

Police Scotland published their annual statistics on firearm and shotgun certificates and visitor permits. There had been marginal changes in certificate numbers overall, but there had been a surge in visitor permits: Firearm Visitor Permits had increased by 17% and Shotgun Visitor Permits had increased by 34%, reflecting a return towards normality for Scottish sporting tourism. However, numbers of permits were not yet back to pre-covid levels.

### **Scottish Practitioners Group**

The Secretary attended meetings of the Scottish Practitioners Group in Edinburgh in February and November. The Isle of Skye shootings were still subject to legal proceedings but the report of the House of Commons Scottish Affairs Committee was already with the Home Office. Recommendations included full cost recovery on fees; a two-tier system for licensing which would distinguish between possession for 'employment' reasons and 'recreational' possession (though it was acknowledged by Police Scotland that this would be difficult to manage with any consistency); a single certificate for both S1 and S2; interrogation of referees; amending of the certificate term; mandating of GPs to participate in the firearms licensing process; and a dedicated hotline for expressions of concern about certificate holders. There was discussion about concerns expressed by referees, and on the proposal for a single certificate. However, it was pointed out by police attendees that the checks made for S1 and S2 were in any case identical, making the single certificate approach largely irrelevant. It was acknowledged that GP involvement remained inconsistent.

Regarding the move to non-lead ammunition and associated new deer legislation, refusal by Scottish venison dealers to accept deer carcasses shot with lead ammunition had led to an almost complete transition to non-lead ammunition for the shooting of deer. A reduction in minimum bullet weight in Scotland to 80 grains for shooting all deer was introduced on October 21 to assist this transition, but it was noted that some 80 grain copper bullets would not achieve the 1750 ft lb of muzzle energy required by the 1985 Order for shooting deer. The BSSC Secretary asked the Scottish Government representative if they would be reducing the muzzle energy requirement in line with the reduction in minimum bullet weight. The Scottish Government responded that it was aware that some bullets did not meet the energy criteria and that the onus would now be on the operator to ensure his ammunition met the legal specifications.

## **Sound Moderators**

The Policing Minister, Chris Philp MP, confirmed at a meeting on February 7 that he was minded to take forward the Council's proposal to deregulate sound moderators if there was support both from the shooting community and the police. Such support was assured by the Secretary, who had previously discussed the matter with both NPCC and Police Scotland. It was initially hoped that deregulation might be progressed by way of a forthcoming Firearms Bill. Ultimately, however, that did not prove possible, and officials intimated that moderators could be included in a future Home Office Bill during the current Parliament. Prior to the King's Speech in November there was more discussion around the inclusion of moderators in the proposed Criminal Justice Bill, but unfortunately this was also not achieved. The Secretary again raised the matter with the Home Office Head of Firearms Policy who reaffirmed the Government's intention to deregulate and who indicated that an Order under the Legislative Reform Act 2006 might present an alternative opportunity. The Chairman wrote again to the Policing Minister stressing the value of deregulation both to the shooting community and the police, and he and Sir Geoffrey Clifton-Brown met the Minister prior to the Christmas recess to discuss the issue.

## **Statutory Guidance**

The first revision of the Statutory Guidance for Chief Officers of Police was published on February 14, taking into account views received from the police, the shooting associations and other interested parties. The revision contained stricter guidance on referees, and restriction on the use of S7 permits by licensing departments to extend certificate duration in cases where a renewal had not been determined prior to certificate expiry. In announcing the revisions, the Policing Minister added that further changes could result from his response to the Plymouth inquest and the IOPC report.

## **Treasurer**

At the Annual General Meeting in March, Bill Harriman retired from the post of Treasurer after 10 years of service, for which he was warmly thanked by the President. Chris Miles was unanimously elected as Treasurer in his place. There were also changes to the Council's accountancy arrangements following the sad death of BSSC's long-time auditor David Hughes. Arrangements were made with Paul Austen Associates Ltd for the preparation of the Annual Accounts.

## **Trophy hunting**

The Hunting Trophies (Import Prohibition) Bill, which had been introduced by Henry Smith MP as a Private Members Bill but which was subsequently accepted by the Government at Second Reading as constituting the fulfilment of a Conservative manifesto commitment, received support from MPs from all sides of the House, as Members queued to congratulate those who had campaigned for the new law, in particular anti-hunt activist Eduardo Gonçalves. The debate was not entirely one-sided, however, as Sir Bill Wiggin MP argued

successfully to ensure that any ban was indeed restricted to trophies from truly endangered species, in line with his party's manifesto pledge. As a result, the Bill was amended to remove the Government's power to vary the species to which the new law would apply and to require the Secretary of State to appoint an expert Advisory Board to advise on matters related to the import of hunting trophies. In practice, the import ban would therefore cover those species listed in appendices 1 and 2 of CITES. These include some antelopes and gazelles, some deer, elephants, wolves, big cats, bears, zebras and rhinos. The Bill passed to the House of Lords. While many Peers supported the principles of wildlife protection, concern was raised by some at what was regarded as a well-intentioned but mistaken Bill. It was noted that "a hunting safari will employ more local people per tourist than big national park photo tourism will ever do," and that "Most of that hunting money will also go straight back into the local economy." The Bill made slow progress and eventually ran out of time.

## **United Nations**

The UN Open Ended Working Group (OEWG) on conventional ammunition was established to consider the through-life management of ammunition with a view to preventing illicit transfers. Initiatives on ammunition, in particular marking and tracing, may be regarded as the greatest problem currently faced by the firearms interest at the UN, and at an OEWG meeting in New York, a new framework was adopted to regulate ammunition at international level, dealing with such matters as surveillance of national ammunition stockpiles and record keeping to prevent diversion to organised criminal or terrorist groups. On marking and tracing, the framework sought to confirm minimum standards regarding lot and batch numbers on packaging. The framework stopped short of seeking the marking of individual rounds of ammunition, saying only that states could supplement existing records by the application of sub-lot numbers, down to the individual round 'where consistent with national law, feasible and economically viable.' The UN Programme of Action on Small Arms and Light Weapons continued to address 'new technology' such as 3D printing and polymer weapons. However it appointed a technical expert group which would include industry representation.

## **Value of Shooting**

BSSC continued its support for the Value of Shooting survey, an investigation into the economic, conservation and social value of shooting sports. The survey report continued to take shape, and it was agreed that, with a General Election coming, there was an urgent need to demonstrate the value of shooting sports in the media and in Parliament and that the published report would assist in this respect.

## **World Forum on Shooting Activities**

The Secretary attended meetings of the WFSA Environment Committee in the margins of the SHOT Show in Las Vegas in January and, in his capacity as WFSA President, chaired the WFSA Executive meeting, General Assembly and Plenary meeting in the margins of IWA in Nuremburg from February 28 to March 1. This included the presentation of the Vito Genco Shooting Ambassador Award to Steve Rinella, star of the hugely popular Netflix 'Meat Eater'

hunting show, and the introducing as WFSA guest speaker of the Namibian hunting outfitter Danene van der Westhuyzen, Namibia's first female licenced Professional Hunter. In addition, the Secretary participated in speaker events at the official launch of the IWA show itself in support of the show organisers. In September, the autumn conference of WFSA was held in London and hosted by BSSC. The conference venue was the Leonardo Royal London St Pauls Hotel, and 16 delegates and four partners attended from 8 countries. A welcome dinner was arranged at the hotel on the evening of September 18. This was followed by a full day of meetings on September 19. During the day, delegates' partners were hosted by Veronica Downing on tourist visits around London and in the evening there was a short sightseeing tour of Westminster followed by a dinner at the Farmers Club attended by the BSSC Chairman and Vice Chairman. The whole conference, proved to be a great success and was concluded with a tour of the Proof House and a visit to the Royal Armouries collection at the Tower of London guided by Royal Armouries curator Emma Mawdsley, kindly arranged by Derek Stimpson. Delegates departed on September 21.

### **WFSA Discrimination Survey**

Arrangements were progressed for a WFSA survey on discrimination against firearms owners, shooting associations and the international firearms trade by transportation companies and financial institutions such as banks and insurance companies. A contract was agreed with a US market research firm specialising in this area to undertake the survey and a preamble to the survey questionnaire was drafted and agreed, for presentation to the WFSA's meeting at SHOT Show in Las Vegas in January 2024.

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