

# BRITISH SHOOTING SPORTS COUNCIL

## ANNUAL REPORT

2017

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Cover picture courtesy of Graham Downing.

## FOREWORD

2017 saw a number of important issues remain unresolved. These included the change from medical evidence as part of the application process for firearm certificates if there was doubt concerning the applicant's health to medical evidence for all applicants, for which the applicant would potentially have to pay a fee set by the GP. Police Scotland has at least persuaded almost all of its GPs to co-operate but, with 43 police forces achieving consensus in England and Wales will not be easy.

The EU's latest Firearms Directive has already severely damaged the UK's deactivated firearms industry by introducing flawed deactivation standards with which in some cases compliance is not possible. There are difficulties looming regarding the records of movements of dealers' stocks, the marking of firearms entering the EU and keeping records of deactivated firearms. The Policing and Crime Act has, however, brought with it some positive changes for the shooting community, among them the return to Section 1 of expanding ammunition and helpful reform of the law regarding the possession on private land of firearms by non-certificate holders.

I am concerned about the possible outcomes of the review of the law relating to air gun safety. Air guns have in the past been the entry-level firearm used to teach boys and girls the basics of firearm safety, marksmanship and good shooting manners in a family environment, Let us hope that we will be able to continue this quiet domestic pleasure.

The Lord Glentoran CBE

## THE COUNCIL'S OFFICERS

PRESIDENT	The Lord Glentoran CBE
CHAIRMAN	Jonathan Djanogly MP (from March)
VICE-CHAIRMAN	Martyn Jones
TREASURER	Bill Harriman
SECRETARY	David Penn

*“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	Graham Downing
CLAY PIGEON SHOOTING ASSOCIATION	Nick Fellows
DEACTIVATED WEAPONS ASSOCIATION	Barry Johnson
GUN TRADE ASSOCIATION	John Batley
HISTORICAL BREECHLOADING SMALLARMS ASSOCIATION	Derek Stimpson
INSTITUTE OF CLAY SHOOTING INSTRUCTORS	Malcolm Plant
MUZZLE LOADERS' ASSOCIATION OF GREAT BRITAIN	Ken Hocking
NATIONAL RIFLE ASSOCIATION	Andrew Mercer
NATIONAL SMALLBORE RIFLE ASSOCIATION	Ken Nash
PREPARATORY SCHOOLS RIFLE ASSOCIATION	Mary Eveleigh
SCOTTISH ASSOCIATION FOR COUNTRY SPORTS	Alex Stoddart
SPORTSMAN'S ASSOCIATION OF GREAT BRITAIN & NORTHERN IRELAND	Mike Wells
UNITED KINGDOM PRACTICAL SHOOTING ASSOCIATION	Adam Rowsell
CO-OPTED MEMBER	Jim McAllister
HONORARY LEGAL ADVISER	Mark Scoggins

## ABBREVIATIONS

ATT:	Arms Trade Treaty
BASC:	British Association for Shooting and Conservation
BMA:	British Medical Association
CA:	Countryside Alliance
CSP3:	Third Conference of State Parties to the Arms Trade Treaty
DEFRA:	Department for Environment and Rural Affairs
ECHA:	European Chemicals Agency
EU:	European Union
FACE:	European Federation of Associations for Hunting & Conservation
F&GP:	BSSC's Finance & General Purposes Committee
FOI:	Freedom of Information request
GP:	General Practitioner
HSE:	Health & Safety Executive
IMCO:	EU Internal Market and Consumer Protection Committee
MARS:	Manually Assisted Release System
MEP:	Member of the European Parliament
MEWG:	Home Office Medical Evidence Working Group
MLAGB:	Muzzle Loaders Association of Great Britain
NABIS:	National Ballistics Intelligence Service
NFLMS:	National Firearms Licensing Management System
NPCC:	National Police Chiefs' Council
REACH:	EU Registration, Evaluation, Authorisation and Restriction of Chemicals
RFD:	Registered Firearms Dealer
S&W:	Smith & Wesson
T&R:	BSSC's Technical & Research Committee
TNIAG:	Themed National Independent Advisory Group
UN:	United Nations
WFSA:	World Forum on Shooting Activities

**Overview:** 2017 saw the Scottish Government sanction major changes in the way in which medical evidence was collected as part of the process of issuing and renewing firearm certificates and shotgun certificates and also reject the Home Office 's 'Guide' with regard to antique air weapons. The period from July to September was relatively quiet since the Civil Service had gone into 'purdah' because of the general election and the proroguing of Parliament for the summer recess. The end of the year was busy again with a Home Office review of air weapon safety and consultations on 'Offensive and dangerous weapons' and ivory.

**Air weapons review:** During the Commons adjournment debate about the control of air rifles held on the 9<sup>th</sup> October, the Minister for Policing and the Fire Service, the Rt Hon Nick Hurd, had made it clear that the Government was not complacent about air weapon safety, and strong controls were already in place. He intended to look closely at the existing measures, particularly safe storage. A decision was taken to review the controls, rather than hold a formal consultation, and the review documents were distributed to stake-holders on the 12<sup>th</sup> December. The BSSC submitted its views before the deadline of the 3<sup>rd</sup> January. These took

the line that existing measures were sufficient, if properly administered, and were proportionate. Licensing would be disproportionate and absorb scarce and shrinking police resources. Access to good advice on safety and storage was essential so the new Home Office leaflet should be readily available and widely distributed. Legislation of itself did not guarantee safety, so gun safety should be taught as a life skill.

**Council and Committee meetings:** The Technical & Research Committee met on the 2<sup>nd</sup> February, 18<sup>th</sup> May, 14<sup>th</sup> September and 23<sup>rd</sup> November and the Finance & General Purposes Committee met on the 2<sup>nd</sup> February and on 14<sup>th</sup> September, when the F&GP Committee discussed the draft budget for 2018.

T&R agenda items during the year included: The Policing and Crime Bill, firearms fees, revision of the Firearms Rules, deactivated firearms, antique firearms, Scottish legislation, medical evidence for the grant and renewal of firearm and shotgun certificates, the EU Firearms Directive and the Olympics, guidance to the Explosives Regulations, possible EU restrictions on the use of lead in ammunition, the Council's Forward Plan, the proposed ban on 'Fifty cal' rifles and 'rapid firing rifles', the proposed restrictions on the sale and possession of certain types of knives, a re-definition of 'flick knife' (a ban on the possession of which is also proposed), the stakeholder review of air weapon security and control, the London Assembly Police & Crime Committee's investigation into gun crime and the proposed ban on the sale of ivory.

At the Annual General Meeting on the 23<sup>rd</sup> Lord Glentoran was re-elected as President and Jonathan Djanogly, the Member of Parliament for Huntingdon, was elected as BSSC's new Chairman. He is a keen shot and succeeds Sir Peter Luff. Martyn Jones was elected as Vice Chairman and Bill Harriman as Treasurer. Jim McAllister was co-opted onto Council. The accounts for 2016 were approved. At the Council meeting that followed there was discussion of firearms fees, the Policing and Crime Act, the draft EU Firearms Directive, the 'Action Counters Terrorism' hotline and medical evidence for firearms licensing. Guests of the Council at the Annual Luncheon included Sam Darby (Home Office), Vicky Ford MEP, Roger Hancox (Proof Master, Birmingham), James Legge (Countryside Alliance), Professor David Ormerod (Law Commission), Richard Mabbitt (Proof Master, London), Stephen Petroni (Chairman, Federation of European Societies of Arms Collectors) and Graham Widdecombe (Home Office).

A meeting of the Council was held on the 15<sup>th</sup> June, chaired for the first time by Jonathan Djanogly. Agenda items included deactivated firearms, medical evidence, the Policing and Crime Act, the EU Firearms Directive, the cost of firearms licensing, the BSSC's Forward Plan and membership.

**Deactivated firearms:** the EU Commission's attempts to introduce new and more rigorous deactivation specifications were a major issue throughout the year and into 2018. Initially the EU's Deactivated Weapons Technical Committee had been very keen on the 2010 United Kingdom specification and Britain had been given the task of preparing for this Committee pattern examples of the deactivation of every weapon type to meet the EU's proposed new specifications. These specifications would then have been subject to a stress test. Legal opinion was divided on the issue of compensation for individuals or companies with holdings of unsellable deactivations, but the likelihood was that, as possessors of old specification deactivated firearms would not be deprived of them (although their owners would not be able to sell them or take them into another EU Member State), compensation would not be

payable. The Home Office, however, was aware of the wish of the British trade to ensure that weapons deactivated to the old (but rigorous) UK deactivation standards could continue to be sold. There was a provision in the Directive which would allow Member States to apply for national standards in force before 8 April 2016 to be recognized. An application had to be made within 2 months of the Directive coming into force and the Home Office had sought such recognition, having furnished details of the UK 1995 specification to the Commission in June. The Commission would decide within twelve months whether, or not, to accept national standards which differ from those in force in Regulation 2015/2403. At the time of writing, the outcome is not known. Jonathan Djanogly had requested a meeting with the Rt Hon Nick Hurd, the new Minister for Policing and the Fire Service, to reinforce the British stance. It is understood that the Netherlands, Spain and Hungary have submitted similar requests. No-one can predict the outcome. The Czech Republic had questioned the legality of the Directive and, after the most recent meeting of the technical committee, the French Proof house had withdrawn from it. It was understood that Austria, Germany, France and Belgium were continuing to use their current national deactivation standards. The situation was not improved by the Commission revising its specifications without heeding the views of its own technical committee, resulting in recently-deactivated firearms having to be deactivated again, an expensive and in some cases impossible undertaking with inevitably harsh financial consequences for the British trade.

**EU Firearms Directive 2017/853:** On the 14<sup>th</sup> March the new Directive was approved by the EU Parliament by 491 votes to 178. It is something of a mixed bag, and came into force on the 13<sup>th</sup> June, after which Member States would have only 15 months to incorporate the new rules into national law. Member States must meet several deadlines to accomplish this. The first of these is 14<sup>th</sup> September 2018 for Member States to have in place electronic means of exchange of information. A further deadline will be for Member States to have in place by the 14<sup>th</sup> December 2019 an electronic system that would allow Registered Firearms Dealers immediately to notify transfers to the Authorities. Issues affecting the UK which remain unresolved are the licensing of deactivated firearms and controls on the acquisition and possession of large capacity magazines. Museums, military re-enactors and film hire companies, whose ability to possess firearms or deactivated weapons would have been seriously compromised by the Commission's proposals as originally drafted, are now catered for, subject to safeguards, after briefings from UK interests. Historically important firearms will not be covered by new marking requirements, nor will the marking rules apply to antiques. The definition of antiques will lie with member states, as will storage and transportation requirements for firearms, so it is hoped that there will be no change to present practices in the UK. Semi-automatic .22 rim-fire rifles would remain in Category B, a major victory. For these ameliorations MEP Vicky Ford, chair of the IMCO Parliamentary Committee and *Rapporteur* for the draft Directive, deserves our considerable thanks. What this will mean for Britain is still unclear, as the meaning of 'declaration' remains under consideration. Also unclear in the UK context will be the possession and acquisition of high capacity magazines (over 20 rounds for pistols, over 10 for long arms). At present such magazines are freely available in Britain. Acquisition and possession may in future require a Category A prohibited weapon authority. Article 5 3 states:

Member States shall ensure that an authorisation to acquire and an authorisation to possess a firearm classified in category B shall be withdrawn if the person who was granted that authorisation is found to be in possession of a loading device apt to be fitted to centre-fire semi-automatic firearms or repeating firearms, which:

(a) can hold more than 20 rounds; or

(b) in the case of long firearms, can hold more than 10 rounds, unless that person has been granted an authorisation under Article 6 or an authorisation which has been confirmed, renewed or prolonged under Article 7(4a).

This is severe, given the widespread distribution of high capacity magazines among British shooters, collectors and re-enactors. Category B encompasses conventional centre-fire repeating rifles capable of being used with high capacity detachable magazines. The year ended with an EU Commission meeting being called for the 31<sup>st</sup> January 2018 to discuss marking of firearms and alarm guns (i.e. blank firers).

**Expanding ammunition:** One of the most welcome improvements for which the BSSC had been campaigning was the return of expanding rifle ammunition from Section 5 prohibited status to Section 1. This was included in the Policing and Crime Act. Not only does this simplify life for the quarry shooter who can zero and practice on the range with the same cartridge as he will use when hunting, but it helps the target shooter who may find full metal jacket loads hard to source for some cartridges and greatly reduces the cost of transport for the retailer. Following an exchange of emails, NABIS has confirmed that the following cartridges are deemed to be solely for use in pistols, so, if loaded with expanding bullets, they would continue to be classified as Section 5(1A)(f): .32 S&W, .32 Colt, .320 Revolver, .380 Revolver, .45 Auto Rim, .44 Automag and .50 Action Express. Popular ‘gallery rifle’ cartridges such as .38 Special, .357 Magnum, .44 Magnum and .45 Colt are deemed to be ‘dual use’, so expanding loads for them have reverted to Section 1.

**FACE:** Graham Downing (Countryside Alliance) and Matt Perring (BASC) are members of FACE’s firearms committee and the BSSC is a member of FACE UK. A meeting of FACE UK was held on the 28<sup>th</sup> March. The new Secretary General of FACE Ludwig Wellneger attended. Agenda items included FACE’s role in ‘Brexit’, FACE UK’s role in lobbying the UK government on ‘Brexit’ on behalf of FACE, avian flu and ECHA (the European Chemicals Agency) and its plan for further restrictions on lead in ammunition. FACE has very successfully lobbied against a move by the Convention on Migratory Species to ban lead in ammunition, but this is a continuing battle. REACH, the European Regulatory body on Registration, Evaluation, Authorisation and Restriction of Chemicals, is considering a restriction of the use of lead shot over wetlands, which is concerning news. In the coming months, FACE expects ECHA (the European Chemicals Agency) to commence work on its report on the restriction of all lead ammunition, not just shot, over all habitats. Graham Downing attended the FACE conference on securing a future for Europe’s young hunters, held on the 6<sup>th</sup> September. The EU Environment Commissioner, Karmenu Vella, had indicated that shooting and conservation were not incompatible in principle. There was a warning over declining species and a clear intention to revisit the Birds Directive regarding scientific evidence relating to breeding. There was discussion on large carnivores. There was the promotion of wild food as a validation of hunting. Social media were seen as a good way of engaging a younger audience. A meeting of FACE UK was held on the 11<sup>th</sup> October. Matters discussed included FACE’s new premises in Brussels, the Habitat and Birds Directive, the European Chemicals Agency’s review of the use of lead shot over wetlands and concerns over use of veterinary medicines and antibiotics in game feed.

**Firearms fees:** The first of three consultations relating to the Policing and Crime Bill was opened on the 12<sup>th</sup> January and closed on the 9<sup>th</sup> March 2017. The proposed fee for a three year section 5 Prohibited Weapon Authority (at present free of charge) for a dealer would be £1,860, and £1,710 for a renewal. There would be a £200 discount for coterminous



RFD/Prohibited Weapon Authority applications. Museum Firearms Licences would go up from £200 to a proposed £1,440 (£1,240 for a renewal) and a club approval from £84 to a proposed £1,050 (£900 for a renewal). No date had yet been set to discuss fees for firearm certificates and shotgun certificates. Following BSSC's request for a meeting regarding fees for prohibited weapon authorities, rifle club approvals and museum firearms licences, the then Police Minister Brandon Lewis offered to see us in April. On the 1<sup>st</sup> February BSSC lodged a Freedom Of Information request with the Home Office for a detailed break-down of actions taken, time spent and grades of staff involved in the licensing process to enable an understanding to be reached of the true costs involved. The FOI response was not received until the 3<sup>rd</sup> August. The number of responses to the fees consultation relating to the Policing and Crime Act which had closed on the 9<sup>th</sup> March 2017 was around 5,000, an impressive total. A meeting at which fees were discussed was held on the 27<sup>th</sup> March between the Secretary and Nick Hunt, who had succeeded Angharad Thomas as Head of the Tackling Crime Unit, The then Policing Minister, Brandon Lewis, held a meeting on fees on the 19<sup>th</sup> April. He stated that the government was seeking a system in which recipients of prohibited weapon authorities or club approvals paid their fair share, and no cost burden was placed on the police, and he did not wish to put anyone out of business. The announcement of the general election cut short the meeting and as a result no decisions could be taken until the new government was in power. Nick Hunt had recognized that good points had been raised in the consultation process and the government did wish to talk further to shooters.

A firearms licensing round table chaired by Nick Hunt was held on the 5<sup>th</sup> September, the first of two or three meetings to decide on courses of action for changes promised over the past two to three years. The work of these meetings is confidential. With regard to the 5000+ responses to the fees consultation (mainly from approved clubs, who should be congratulated), these would be reviewed by an economist. Detailed discussions were held about cost recovery, fees and how they might be structured. There was a discussion about regaining momentum on the medical evidence issue. The BSSC's Chairman Jonathan Djanogly had requested a meeting with Nick Hurd the Minister for Policing to discuss three matters: fees, the failure to update or replace the National Firearms Licensing Management System and issues relating to deactivated firearms and the EU Directive. When we met him on the 6<sup>th</sup> September, Nick Hurd proved an attentive and perceptive listener. He confirmed from the outset that the Government would not be proceeding with the level of fees proposed during the consultation. We spoke strongly about how smaller dealers and clubs could not afford high fees, but performed valuable public services. We talked about the impact on museums and also about the weaknesses of the National Firearms Licensing Management System. We also discussed the severe negative economic impact of the new EU Regulation on deactivators, dealers and collectors of deactivated firearms, whose holdings were now unsellable without further deactivation and consequent loss of value.

**Firearms Rules:** The only activity of note during the year has been work on a revised form 201 for the grant or renewal of firearm and shotgun certificates. This came into force on the 31 December 2017 and will have completely superseded the old form by the 28<sup>th</sup> February 2018. BSSC has been much involved in the details of form design over several years, particularly through pressure to maintain momentum exerted by Mike Eveleigh (BASC).

**Guide on Firearms Licensing Law:** Under the Policing and Crime Act, parts of the Home Office Guide to firearms legislation would become statutory. This included antique firearms and the consultation on antique firearms was opened on the 19<sup>th</sup> October and closed on the 14<sup>th</sup> December, a rather brief period. BSSC submitted its response on the 6<sup>th</sup> December. The

Council was broadly in agreement with the proposal that the definition of an antique firearm should continue to be based on its ‘propulsion’ system and, in the case of firearms chambered for a centre-fire cartridge, a list of obsolete cartridges. The Law Commission in its report had also endorsed this continuation of a well established and proven approach. One important point over which there continued to be a disagreement, however, was whether or not an obsolete cartridge could be removed from the list. If it could, then, where a pistol was concerned, it would become a prohibited weapon. This could potentially affect the continuing survival of a heritage firearm and also adversely affect its monetary value. We also believe removal to be a mistake since the cartridge remains obsolete having to be made by hand loading which may be done legally. The BSSC looks forward to working on the details of what will become a statutory definition. Meetings with Home Office staff to review the outcome were set for the 22<sup>nd</sup> January and the 12<sup>th</sup> February 2018.

**Health & Safety Executive:** The completion of draft subsector guidance on the storage of shooters’ powders for the ‘Shooters and Shooting’ sub-sector of the Explosives Regulations 2014 had been in the doldrums for some months, but a revised draft was circulated to members of the Working Group, with a deadline for comment of the 14<sup>th</sup> July. Ian MacDonald Watson, a Senior Safety Consultant from the Home Office, had taken over the responsibility for completing the draft of the sub-sector ‘Guidance’. There was considerable activity to improve the text in September and early October. On the 1<sup>st</sup> November a meeting was held of the Working Group at which the draft text of the Guide on storage of shooters’ powders was extensively improved. Further work on the text demonstrated that it was not yet fit for purpose, however, so work would continue in 2018. We owe considerable thanks to Matt Perring (BASC) and Dr Sandy Robertson (MLAGB) for all their hard work on this project.

**Home Office Dangerous and Offensive Weapons:** The consultation on Dangerous and Offensive Weapons opened on the 14<sup>th</sup> October and closed on the 9<sup>th</sup> December. The BSSC’s response expressed its concern over changes to the terms of the consultation in the section where firearms were addressed. With regard to the ‘Fifty cal’ consultation, this had been widened to include ‘other similar high power, long range rifles’ and had introduced a 10,000 foot pounds muzzle energy limit. The MARS rifle proposal had been expanded to include unspecified arms employing an as yet undefined ‘manually activated release system’. Nor had any evidence been adduced in support of these proposals. Nevertheless the Council responded notwithstanding its concern over the changes to the consultation. It responded in a spirit of co-operation and did so for the sake of good order and without prejudice. With regard to the proposal to prohibit ‘.50 calibre materiel destruction’ rifles and ‘rapid firing rifles’ under section 5 of the Firearms Act 1968, no evidence had been produced of the misuse in Britain of either type of firearm by terrorists or criminals. It is the design of the bullet and the material from which it is made, rather than the type of rifle, which determines its materiel destruction capability. The bullets used for target shooting in ‘fifty cal’ rifles in Britain are not designed to have an armour piercing capability. Armour piercing and explosive .50 cal ammunition is already prohibited. The size and weight of these rifles limit their misuse.

The Council could not support the proposed ban on the sale of knives to private addresses, since anyone’s home already provides immediate access to numerous sharp or pointed instruments used in the course of everyday life. The inconvenience of a ban to the legitimate purchaser was therefore substantially disproportionate. The Council strongly opposed the proposed ban on the possession of certain knives in the home. This potentially would

adversely affect collectors and ‘collecting’ would need to be added to the list of defences. The existing 100 year rule would need to be applied to establish the antique status of knives and the wording of the offence would require care and precision to avoid adverse effects and unintended consequences on the legitimate collecting of swords, bayonets, hunting knives and so on. The proposal also gave the police far too wide a power speculatively to enter and search people’s homes. The Council disagreed with the proposal that it was in the public interest to extend the offence of possession of offensive weapons/articles with blade or point to further education colleges, sixth form colleges, designated institutions and 16-19 academies. Exceptions would have to be made for a wide variety of non-academic vocational training, for instance trainee chefs, pattern cutters and butchers. It would affect educational establishments offering courses in agriculture, wildlife, conservation and game keeping. The Council is also seeking to safeguard the continuing legitimate and wide use of corrosive substances in the countryside, museums, the health and food industries, and in other areas.

**Ivory:** A Parliamentary debate on the ivory trade in February generated considerable media interest, culminating in October with a call to ban all ivory sales. DEFRA issued a consultation paper in October and the BSSC responded on the 5<sup>th</sup> December. The BSSC did not support the proposed ban and made a submission.. It recommended that the existing 1947 break date for worked ivory be retained, and that weapons incorporating ivory should be exempted, as was being proposed for musical instruments. A discussion is ongoing in the EU on a possible total EU ban on the trade in ivory.

**Lead in ammunition:** FACE has very successfully lobbied against a move by the Convention on Migratory Species to ban lead in ammunition, but this is a continuing battle and the BSSC has written to DEFRA to seek their support in retaining the current position whereby states have some ‘flexibility’ over its application. REACH, the European Regulatory body on Registration, Evaluation, Authorisation and Restriction of Chemicals, has been asked to consider the restriction of the use of lead shot over wetlands, which is concerning news. FACE expects ECHA (the European Chemicals Agency) to commence work in the coming months on its report on the restriction of all lead ammunition, not just shot, over all habitats.

**Medical Evidence Working Group (MEWG):** During 2017 it became clear that the situation regarding the consideration of medical evidence as part of the application process for a firearm certificate or shotgun certificate was one of growing disparity between Scotland and England and Wales. Police Scotland had achieved very good firearms licensing results, having the advantages of a single policy, a single budget and the support of the Chief Medical Officer in Scotland. By the end of the year 125 GP surgeries were now co-operating with the firearms licensing procedure and only 12 were not. 11,491 shooters have had enduring markers placed on their medical records, with only 474 still unmarked. 97% of certificates were renewed before expiry. To maintain perspective, in Scotland approximately 600 certificate holders from 51,000 could be negatively affected by GP non-compliance.

Initially the procedure agreed by the MEWG for seeking medical evidence was that the police would send the GP a letter asking the GP to give tick box answers and to return the letter within 21 days. No fee was expected to be charged and, if no response was received, the police could infer that there was no medical concern and proceed with processing the application. Police Scotland considered that this did not provide sufficient reassurance to the Chief Constable, however, and it had become clear that the majority of GPs did expect payment, ranging up to £200, but averaging c. £40. Police Scotland has therefore introduced a system whereby the applicant is required to contact his GP, hand over the form and negotiate

any fee. The application process would not progress until the information had been received. There have been two continuing problems: the disparity in fees charged and the action to be taken if a GP refused to cooperate on grounds of conscience.

The situation in England and Wales was less than satisfactory. The BMA had provided a template for GPs to use, conscientiously or otherwise, to object to engagement in the firearms licensing process. They no longer recommended that dissenting GPs should refer patients to other practices and they were also advising GPs not to place enduring marker codes indicating access to firearms on patients' records. On the 17<sup>th</sup> March the Daily Telegraph ran a major news story concerning a serious security breach in the computerised medical records program SystemOne used by c. one in three GPs. Security of data has, and continues to be, a major BSSC concern. This was drawn to the attention of the Home Office. The problems encountered with the BMA were discussed with the then Minister for Policing, Brandon Lewis, at a meeting called for the 19<sup>th</sup> April to discuss fees and medical evidence. During this meeting came the news of the calling of a general election which would delay progress until the new government was in place. The Minister accepted that the agreement with the BMA was not binding on GPs. He had raised the issue with the Health Minister. He expressed a wish to talk further after the election and to achieve a safe environment in which the shooting sports could be enjoyed but, in the mean time, asked for information on police forces where problems were occurring to be forwarded to the Home Office. He would personally intervene with forces. The introduction of legislation is recognised as the most effective means to resolve the current challenges but the Home Office maintains that there is no Parliamentary time available. In England and Wales forces have continued to follow the Home Office 'Guide', or have developed their own version or have adopted the Scottish procedure. While it is fair to say that it was accepted by all that a system was required to ensure that the interests of public safety were preserved and that information sharing processes between the police and health professionals would need to be efficient and effective, there is at present no agreement among BSSC's member associations on the fees issue, however, although all agree on the goal of a 10 year certificate. It will be necessary to continue to work on fees over the coming months. The British Shooting Sports Council has called for the re-convening of the Medical Evidence Working Group. The BSSC does not support a payment for the GP's response to the first letter. It does strongly support the Home Office's current guidance that, if the GP had not responded within 21 days, the applicant should not be disadvantaged.

**Metropolitan Police meeting for Registered Firearms Dealers held on the 31<sup>st</sup> July:** BSSC participated in this very useful meeting concentrated on security, on the new 'Good Practice Guide for Registered Firearms Dealers' and on the correct procedure if a member of the public wished to surrender a firearm, including a prohibited weapon, to a dealer.

**NABIS:** The National Ballistics Intelligence Service held a Firearms Crime Prevention Strategy Meeting on the 26<sup>th</sup> September to discuss the Metropolitan Police's 'Smart Water' firearms marking project, the updating of the Home Office Firearms Security Handbook, standards of investigation into lost and stolen firearms and a proposed national voluntary cartridge retention scheme. This proposed that shooters should retain fired cartridge cases from their firearms or shotguns, to be passed to NABIS in the event of the loss or theft of a firearm. They would be used for comparative purposes with cartridge cases left at a crime scene. The planned conference to present case studies showing links between the 'criminal world' and the 'lawful firearms world' was postponed until 2018 because of Court delays.

**New member of Council:** The BSSC welcomed the Preparatory Schools Rifle Association which was elected to the Council on the 15<sup>th</sup> June. The PSRA was founded in 1906 and teaches all aspects of sports shooting to children from the age of nine to fourteen.

**NPCC (the National Police Chiefs' Council) Criminal Use of Firearms Themed National Independent Advisory Group (TNIAG):** A meeting was held on the 12<sup>th</sup> April, attended by Mark Scoggins and the Secretary. Roy Saatchi was re-elected as Chairman. Among issues discussed were 'Citizen Aid' (a programme of advice to adults and children on how to react to a terrorist incident, with emphasis on appropriate first aid), current legal issues including the Mark Duggan case, the EU Firearms Directive, and further delays to the planned conference on the move of firearms from legal to illegal possession. A further meeting took place on the 4<sup>th</sup> July. Among subjects discussed were an update on the Citizen Aid programme, obsolete cartridge firearms consultation, the acquisition of sound moderators, the anticipated impact of the EU Firearms Directive on the National Firearms License Management System, medical evidence, risk management, cartridges suitable for stalking, a threat update and legal issues. At the meeting on the 13<sup>th</sup> December there was discussion of sources of illegal imports to the UK and to other EU states, the increases in the number of firearms discharges and shotgun thefts, the consultation concerning the MARS rifle and 'Fifty cal' rifles and the recent firearms surrender programme covering England and Wales.

**NPCC Firearms & Explosives Licensing Working Group and the Practitioners' Group:** A BSSC Practitioners Group meeting was held on the 5<sup>th</sup> April. On the agenda were computer issues, the fees consultation, medical evidence and problems relating to continuous monitoring and the introduction of a ten year certificate. A further Practitioners Group meeting was held on the 15<sup>th</sup> August at which were discussed computer issues, the fees consultation, medical evidence, problems relating to continuous monitoring and factors affecting any future introduction of a ten year certificate. The next Practitioners Group meeting was scheduled for the 6<sup>th</sup> February.

**NPCC National Firearms Licensing Management System:** The intention continues to be to replace this ageing system used in England and Wales, which is nearing the end of its useful life, but a replacement may now be at least four years away, so an upgrade will be needed. The project had been re-named the National Firearms Licensing Transformation Program'. The program may face a major modification to incorporate dealers' records and possibly also information on deactivated firearms, as required by the EU Firearms Directive. Following a meeting with Nick Hurd, the Minister for Policing, the Secretary had sent him details of the inadequacies of NFLMS. The project has now become part of the Digital Policing Portfolio, and has again been re-named the 'Digital Public Contacts Business Transformation Programme'. The priority at the moment is finding funds to progress the programme.

**Olympics and Commonwealth Games:** With regard to the Commonwealth Games, Cape Town had withdrawn its offer to host the 2022 event and both Birmingham and Liverpool were considering 'rescue' bids, neither of which included shooting. Shooting is a 'discretionary' sport, although very popular with smaller Commonwealth countries, who may be expected to lobby and vote to ensure its inclusion. BSSC expressed strong concern.

Liverpool then decided not to continue with its bid. The National Shooting Centre at Bisley was offered to Birmingham for the shooting events, but this was not accepted. One reason was apparently that shooting would not leave a tangible legacy benefit for Birmingham. It

was understood that pressure to include shooting would continue to be exerted on the Commonwealth Games Federation by Commonwealth nations.

**Policing and Crime Act:** The Policing and Crime Bill received Royal Assent on the 31st January. The Commencement Orders for most of the Policing and Crime Act, including the reversion of expanding rifle ammunition to Section 1 and the ‘borrowing’ clause took place on the 13<sup>th</sup> March and on the 2<sup>nd</sup> May, as follows: The Policing and Crime Act, Commencement Order Statutory Instrument No.399 (C.38)/2017 was laid before Parliament on 13 March 2017 to give effect to the following section of the 2017 Act on 3 April 2017: s.133 ‘Guidance to police officers in respect of firearms’ and on 2 May 2017: s.125 ‘Firearms Act 1968: meaning of “firearm” etc.’ s.127 ‘Possession of articles for conversion of imitation firearms’ s.128 ‘Controls on defectively deactivated weapons’ s.129 ‘Controls on ammunition which expands on impact’ s.130 ‘Authorised lending and possession of firearms for hunting etc.’

The remainder of the firearms provisions in the 2017 Act (s.126 ‘Firearms Act 1968: meaning of an ‘antique’ firearm’, s.131 ‘Limited extension of firearm certificates etc’, and s.132 ‘Applications under the Firearms Acts: fees’) will come into effect separately by commencement order(s) in 2018.

**Revisions to the Firearms Rules:** The introduction of the much worked upon revised forms for the grant or renewal of firearm and shotgun certificates and for variations took place on the 31 December 2017.

**Standing Conference on Countryside Sports and Management:** A meeting was held on the 27<sup>th</sup> April. In addition to updates on the political and legislative situation in the UK there was discussion on research into the economics of driven game shooting and on ‘rewilding’. The 78<sup>th</sup> meeting was held on the 2<sup>nd</sup> November. Issues included invasive alien species and how they might be controlled, illegal killing, puppy farming and the possible impact of a Corbyn-led Labour Government on game shooting.

**Steyr LP50 air pistol:** This high quality five shot repeating air pistol popular with top flight shooting athletes had been on the market in the UK for several years, but doubts had been expressed on its legal status and this was discussed at a BSSC Practitioners’ Group meeting on the 5<sup>th</sup> December 2016. It was either a low-powered air pistol for which no certificate was required, or it was a semi-automatic requiring a prohibited weapon authority. NABIS considered legal and technical opinions and a report from a forensic adviser. On the 26<sup>th</sup> June it was announced that the consensus was that the Steyr LP50 air pistol was not ‘self loading’ in terms of Section 57(2A) of the Firearms Act 1968, although only a Court decision could provide certainty. It may again be acquired and held without any form of certificate or authority, which is excellent news for pistol shooters. This clarification of status also applied to the Steyr Hunting 5 Auto rifle.

**World Forum and the United Nations:** WFSA Committee and Executive Committee meetings were held in Nuremberg on the 1<sup>st</sup> and 2<sup>nd</sup> of March. A first informal preparatory meeting on the Arms Trade Treaty was held in February in Geneva at which three representatives of WFSA attended. Between April and June there were further working groups and two preparatory meetings before the Third Conference of State Parties (CSP3). The WFSA ATT Working Group sought expert advice on Strategic Communication. The Third Conference of State Parties (CSP3) on the Arms Trade Treaty met between the 11<sup>th</sup> and

15<sup>th</sup> September. The two previous CSPs had discussed financial, bureaucratic and administrative processes relating to the Treaty, but had not devoted any time to consideration of actual arms transfers that violate or undermine the Treaty, despite 45 governments having submitted their first annual reports on arms exports and imports. The Third Conference was little better, having focused on procedural issues and the expanding bureaucracy attached to the ATT Secretariat. A point of interest was the lobbying by anti-gun Non-Governmental Organisations for the creation of national data bases of licensed civilian firearms in countries that do not already have them. On the 18<sup>th</sup> September Graham Downing attended the World Forum Workshop on social media in Rome. This provided a valuable insight into social media which has followed the major cultural change that has occurred since the 1990s whereby social media users' interest focuses not on factual content or information but on other people. The destination of a social media message cannot be controlled. The overarching message was that shooting organisations proposing to engage with social media should regard them as just one tool in an overall marketing strategy that must be carefully prepared, thought through and executed. It is not necessary to focus on the technicalities of how social media operate: What is crucial is developing the appropriate message.

The World Forum on Shooting Activities made a statement to the UN General Assembly's First Committee on the 10<sup>th</sup> October 2017, regretting the UN's unwillingness to work with and benefit from the WFSAs' expertise and experience in the arms trade field. The struggle continues.

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