

CONTROLS ON FIREARMS
A CONSULTATION PAPER
FROM THE
HOME OFFICE

A Response by the

RUSTINGTON & DISTRICT HOMEGUARD
(Incorporating Hangleton)
RIFLE CLUB

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INTRODUCTION

This response is by the Rustington & District Homeguard (Incorporating Hangleton) Rifle Club, established in 1944. The Club has 27 members, who shoot on the Club's own 100 yard M.O.D. approved outdoor Range, situated on private land in Sussex.

The Club is also a member of the National Rifle Association and regularly hold meetings at Bisley Rifle Range near Guildford in Surrey, in order to shoot at longer distances.

As stated, this is a response on behalf of the Club's Membership and as such encompasses their views, relevant observations and thoughts, based on their individual knowledge of particular issues raised in the Consultation Paper.

Thus this response can be regarded as the collective work of 27 individuals.

SUMMARY

As stated, this is a Club response and as such it will attempt to provide clear and practical responses to issues raised, avoiding the use of emotive and critical language.

It will also attempt to keep the use of jargon, and the quoting of supporting information and statistics in order to support its arguments, to a minimum.

Instead, it will attempt to provide a clear, controlled and measured response, broken down into layman's terms, so that anyone reading it can clearly follow the points raised.

RESPONSE TO THE FOREWORD BY DAVID PLUNKETT

The Club applauds any action taken to combat and reduce the growing levels of gun crime in the UK.

Gun crime is obviously an issue that causes Club Members, in common with all law abiding citizens, great concern.

As we are all aware, since the ban on legally held handguns was introduced the level of illegally held handguns, and their use in crime, has continued to rise. This indicates a steady stream of supply which does not, and never has had, any connection with legally held handguns.

This is clearly something that needs to be addressed by the Government.

On the issue of low-powered guns firing plastic pellets through the air, guns, and their indiscriminate use in the community, which can be defined by the generic term “gun culture”, the Club Membership again has grave concerns.

These types of incidents are in the main perpetrated by young people who have no kind of supervision or guidance with regard to the use of these kinds of guns.

One possible solution would be to encourage them to attend a recognised shooting club where they could be instructed in the safe use of their equipment by the membership, and hopefully encouraged towards having a responsible and disciplined attitude towards shooting.

Of course, a great advantage of this course of action would be that the young people concerned could develop a keen interest in the safe sport of shooting and realise the benefits to be gained from it. After all,

if they have a safe controlled environment to shoot in, there will be no need for indiscriminate shooting in the community.

On the issue of tackling gun crime, the Club is happy to see so many organisations and government departments working together, but does wonder why there are no representatives from the Sport of Shooting mentioned?

After all, it would be logical to assume that there is a wealth of knowledge, experience and technical expertise that could be used in tackling gun crime which would come from representatives of the shooting community.

PART 1. FIREARMS

Are types of guns in the right category?

The Club feels that the current categories, which are the result of previous Reviews, are correct, and there is no evidence that any currently legally held Firearms should be moved to the prohibited category.

Examples given are:-

1. Large Calibre “material destruction” Rifles

This term is very broad and can be used to describe a wide range of rifles ranging from antique large calibre rifles, including black powder, to modern long range target rifles.

These are all used for the legitimate sport of target shooting on ranges which have been certified for their use. Indeed, more of these ranges are being opened as the sport becomes more popular. Under the assessment of a gun’s “dangerousness” they have a very low rate of fire, they are large, cumbersome and heavy, making concealment impossible and they require a great deal of practice and training before a shooter becomes anywhere near accurate with them.

2. Long-Barrelled/Wrist Brace Revolvers

This firearm was brought in to comply with the new restrictions following the tragic events at Dunblane. These restrictions were brought in to make concealment difficult, (unlike handguns) so one must assume they are difficult to conceal.

The rate of accurate fire is slow due to the long barrel, and as a result many experienced shooters find the ease and accuracy of aim difficult.

However, this is an area of shooting that is becoming more popular as a sideline to rifle shooting, and should be allowed to continue.

3. Long-Barrelled Pump/Self-Loading Shot Guns

These firearms were upgraded to Section 1 following the tragic events of Hungerford. They are used in the Sport of Practical Shotgun which is governed by the United Kingdom Practical Shotgun Association, which shooters wishing to use this type of firearm are required by the issuing authorities to be a member of before they can be granted a Licence. They are also required to complete a rigorous 2 day Training Course which covers handling, safety and gun control along with all aspects of Practical Shotgun. They must pass that Course and receive a Certificate before they can compete in National and International Competitions.

Indeed, because the Sport is held in such high regard it is currently being considered for inclusion in the Olympic Games.

It can be seen from the above that Practical Shotgun shooters are among the most highly trained, safest and skilled shooters in the country, and placing their firearms in the prohibited category would wipe out an entire sport. It would also cancel out the possibility of gold medals for England in what is a very exciting and skilled sporting discipline.

4. .22 Rimfire Rifles

Firstly, it should be observed that these rifles are the same calibre as an air rifle.

In this respect, they are probably the first firearm that “new” shooters will use when visiting or joining a gun club.

Indeed, the Club would guess that a very high proportion of Firearms Licence Holders have one of these rifles on their Licence.

The popularity of this little rifle amongst shooters cannot be underestimated. Indeed, whole businesses have sprung up which deal only with this type of rifle.

Shooting clubs hold competitions solely for this rifle, involving different scenarios and courses of fire.

It should be remembered at this point that the Sport of Shooting is not just about the serious business of laying prone behind an expensive single shot target rifle, on a full bore range, but can also cover, dare it be said, “fun” events which may involve movement!

Indeed, the moving of this rifle to the prohibited category will affect a great many shooting disciplines, clubs, and businesses. The cost in compensation for all the above rifles should also be considered, because these are all currently legally held firearms, and as there would be no alternative available, the Club would actively support claims for compensation.

After all, as dictated by current legislation they are all over a certain length and cannot be concealed, and there already appears to be a supply of more suitable firearms available to the criminal fraternity.

On the issues of the Secretary of States' specific power to ban any firearm that might be "especially dangerous", the Club feels that this is sufficient to respond to unforeseen development in firearms technology.

However, the Club notes that since the banning of self-contained gas cartridge system guns (Brocock), there are indications that a vast majority of them were not handed in or transferred on to a Firearms License, and remain in the hands of the general public.

Should we continue with the present three categories?

It should be noted that this item of the Consultation Paper which is concerned with the certification process is a very large and complex issue.

The Club and its Membership will always support constructive changes in shooting legislation that bring positive benefits to all members of the community.

However, there is a concern that change for changes sake may be the issue here.

With this in mind, it should be noted that the main aim of the Certification Process is to ensure that only responsible members of the public who are of sound mind are allowed to hold firearms. This in turn leads to the protection of public safety.

With this in mind, the events that led to the tragedy at Dunblane should be considered and Lord Cullen's Report revisited.

Did the Certification Process fail to protect public safety, or was it a failure on the part of the authorities concerned to implement it correctly, partly due to inadequate guidelines and the failure of internal procedures?

At any rate, if the Certification Process is to be reviewed in order to avoid such events happening again, it is clear that it is not only the Certification Process that should be reviewed, but also the whole framework concerned with implementing it.

With this in mind, the Club suggest that representatives from all relevant organisation and departments including, most importantly, those representing the Sport of Shooting, should form a new Firearms Licensing Board, and put forward their proposals for a new Firearms Licensing Procedure.

“Good Reason” for Shotguns: Standards of Fitness: Certification Conditions: Referees

The Club’s main activity is primarily Target Shooting, although its Members do possess shotguns held on Shotgun Certificates. This means they hold two certificates.

The Club observes the suggestion of a move to a single Gun Licence, with the requirements for a Shotgun Certification being basically the same as a Firearms Certification.

Obviously, the main concern here is the level of administration that would be required to implement this, and the extra workload that would be placed on already very busy Licensing Authorities, particularly bearing in mind the number of Shotgun Certificates compared to Firearms Certificates.

Could all the additional administration lead to the possibility of mistakes being made by the Licensing Authorities, which would ultimately undermine the effectiveness of the Licensing Process and its key aims?

On the points of Standards of Fitness and Referees, the Club can see no good reason why Shotgun owners should not be subject to the same conditions as Firearms holders.

How else might the Certification Process be improved?

1. Number of Guns

There is no evidence to suggest that the current process is not working well. The Police have to be satisfied that “Good Reason” has been provided for holding each gun, particularly on the issue of same calibre, and that there is also suitable security available.

The dialogue involved in this process increases the amount of contact between the authority and the Firearms holder, which must be viewed as a positive benefit for both parties.

2. Statutory Prohibitions

The Club is in favour of all legislation in this area and is confident that it will be implemented correctly.

It should be remembered that shooting clubs also rely on the strict issuing of Firearms Licences to prevent undesirable elements of society infiltrating club membership.

3. Duration of Certificates

The Club feels that as long as there is regular ongoing contact between the Licensing Authority and Certificate Holder, the

current period of 5 years is appropriate. The benefits of reducing the period are marginal when compared to the additional burdens, e.g. increased administration and costs.

On the issue of “peaks and troughs” that exist with regard to renewals, the Club feels that each Licensing Authority should be allowed to spread the due date for renewals out according to the available resources, within a defined margin. This could be achieved by simply extending renewal dates by a number of months and informing the License Holder of this change.

This could also be done with R.F.D. Certificates.

4. Medical Information

The Club feels that ongoing checks with the Licence Holder’s GP would be a good thing.

All GP’s should have a list of patients under their care that hold either Shotgun or Firearms Licences, and if a relevant issue should arise, they should immediately contact the Licensing Authority and inform them of the issue.

5. Suspension of Certificates

The Club agrees that there is merit in allowing the police to temporarily suspend a Certificate whilst they investigate any concerns they may have. If these concerns are then proved correct, the Certificate can be revoked.

6. Referees

The Club feels that the current system is effective. The referees know the applicant and will have read the guidance notes. If they were not happy with the applicant’s suitability to hold a

Licence it is hoped they would not sign the form, and indeed, would inform the Licensing Authority of their concerns.

7. Mandatory Training/Testing

As stated, the Club Members serve a probationary period during which they are instructed on the safe handling of firearms, along with many other aspects of the discipline. During their probationary period they are continuously observed and assessed, and it is only when they have served their probationary period and the Membership is happy that they have proved themselves competent and of good character, that they are allowed full membership.

Even when full membership is granted, if any Member exhibits grounds for concern, they may face expulsion from the Club.

The Club is aware this does not extend to other Firearms Holders who use their guns for purposes other than target shooting. One possible answer would be to require that they join a shooting club or organisation, or indeed they could form their own organisation and carry out the required assessment and training needs within that organisation.

8. Other Improvements

The formation of a Licensing Committee with representatives from Shooting Associations and Clubs, to improve the process

Component Parts of Firearms

1. Definition of Component Parts

The Club supports the Firearms Consultative Committee's view contained in its Tenth Annual Report, which states that only

pressure bearing parts be regarded as “components” in this context, these being :-

The barrel, chamber or cylinder, frame, action, body or receiver, breach block, bolt or other mechanism for containing the charge at the rear of the chamber, any other part of the firearm upon which the pressure caused by firing the gun impinges directly.

2. Shotgun parts and component parts for prohibited weapons that are not firearms

The Club does not have any clear evidence on the value of making these parts subject to the same restrictions as the complete item to which they relate

Responsibilities for Firearms Licensing

The Club views the proposal of a “National Firearms Agency” with a certain amount of concern as to how this would work.

Firstly, there would still be a need for local based representatives to carry out the mandatory call on License Holders, checking issues of security and actual guns held, particularly at renewal time.

There is also the implication that the personal contact built up between the Issuing Authority and the Licence Holder would be lost.

The main advantage would be that a uniform approach would be applied to Licensing, rather than the current system where the Home Office Guidelines to the Police, as the current licensing authority, are interpreted by each of the County Police Forces, leading to possible anomalies in the system. However, uniformity of approach could also be achieved by issuing the same clear guidance to all authorities concerned with Licensing, thus ensuring that they are interpreted in the same manner.

Advising the Secretary of State on Firearms Matters

The Club welcomes the introduction of a two tier body, the membership of which will include representatives from the Sport of Shooting.

PART 2. UNLICENSED GUNS

Introduction

1. Air Guns

The Club feels that the present power levels are the correct ones for determining how air guns should be classified.

2. Lethality

The Club supports the Firearms Consultative Committee's definition of lethality in that a statutory threshold of one joule (0.7376ft/lbs) muzzle energy should be included in legislation. The Club feels that the statutory definition of a "firearm" does not need to be amended.

Imitation Firearms

1. Readily Convertible

The Club feels that the current definition is correct, and does not need updating. Each case will obviously be different and will be subject to examination in the Courts

2. Offences

The Club feels that the new offence of possession in a public place without legal authority or reasonable excuse is justified in the present climate.

The Club fees that there is a justification for having imitation firearms. There are members of the community who like to collect these items, display them, and research their history.

For these people, imitation firearms give them a chance to own what is basically a non working replica of a real firearm. They

are neither interested in shooting the gun, or indeed in the Sport of Shooting, for them it is simply a collecting hobby.

Unfortunately, there are other members of the community who buy imitations to terrorise and intimidate the general public, and these range from hardened criminals through to youths obsessed with “Gun Culture”. It is the second group the Club is concerned about.

Sadly, with so many of these imitations in circulation already, the Club realises that trying to impose restrictions would be like “closing the barn door after the horse has bolted”.

Previous warnings about imitations were not heeded, and now it is the police who suffer the consequences every time they encounter an individual brandishing one of these imitations in the street.

Air guns

Licensing and Restrictions

The Club agrees that there should be no changes considering the points that have already been raised

Deactivated Firearms

1. Retrospective standards

The club feels that this would be unworkable bearing in mind the recent “BROCOCK” legislation, the level of compliance would be likely to be fairly low.

2. The 1995 Standards

The club feels that these standards are tough enough. However, the Club will leave the question of further improvements to technical experts in this field.

If it is felt that if making them a statutory requirement would benefit the community, the Club would have no objection.

3. License all deactivated firearms

The Club feels that this issue is similar to Imitation Firearms. The level of compliance would be likely to be low, with only respectable legitimate collectors responding.

As a result, the cost and effort involved would outweigh the resulting gains in public safety.

Antiques

The Club feels that regulatory changes in this area are not necessary. On the issue of antiques, and shooting them, the Club also wonders about the question of reproduction flintlock and percussion black powder pistols/rifles and the merits of de-licensing these pistols/rifles.

They are a specialist area of shooting in which a small proportion of enthusiasts partake. The rate of fire is slow, with several tools being needed to accomplish reloading successfully, and accuracy, along with range, compared to modern firearms, is poor.

Also on the subject of black powder and the need for a black powder license, could this not be incorporated into shotgun or firearm licences, leaving the Health and Safety Transportation document the same

Both these suggestions would save administration costs and time.

PART 3. YOUNG PEOPLE AND GUNS

The Club agrees that this is an emotive and difficult issue. But it is an issue that can only be tackled in one way, and that is to give young people the guidance and supervision they require whilst satisfying their obvious, and understandable, interest in guns.

You cannot legislate away a young person's curiosity about the world in which we all live. Guns, and their impact upon our society, are a fact of life. Young people are exposed at an early age to their existence. News programmes showing wars on our television screens as they are happening, newspapers, films, video games and toys are all just a small example of this. In many cases, a child's play culture is geared towards playing with guns, be it cowboys and indians, cops and robbers, or playing at being The Terminator. Our profit driven society fosters this interest, and actively stimulates it, in the pursuit of higher viewing figures, more toy and video game sales, greater newspaper sales. Gun-toting action figures are made into Public Heroes, and one of the most popular toys of all time is the Army Action Man Figure. It must be borne in mind that Arnold Schwarzenegger has never played a humanitarian figure, and Action Man is not a civil servant!!

Young people are therefore bound to be interested in Guns, and to deny them the opportunity to indulge their natural curiosity in a safe, controlled and disciplined environment will only serve to fuel their curiosity, and encourage them to seek other unlawful means to satisfy their inquisitiveness and drive the problem underground.

The Club also observes that private schools, which have a long history of providing private shooting ranges within their grounds for use by their pupils, do not appear to produce future members of Society who are interested in the illicit Gun Culture. This is because they have been exposed to, and trained in, the disciplined Sport of Shooting from an

early age. They are familiar with handling a gun, know well its capabilities and effect, and there is no “novelty factor” to them.

Rationalising age limits

As a young person matures, their sense of responsibility becomes more inherent; hence the need for different restrictions at different ages, in line with other age related social restrictions, e.g. Driving, sex and drinking. It is for this reason that the legislation covering young people and firearms has to be complex. This legislation has been formulated and improved over a number of years to bring us to where we are now.

If one age restriction is brought in, it will simply mean exemptions are necessary e.g. for Cadets, scouts etc and the result will be similar legislation to that which we have now.

It must be pointed out that, as in the distinction between lawful and unlawfully held guns, there is no connection whatsoever between young people using guns legally, and illegally held guns in the hands of the wrong people.

PART 4. TRADE

The Club has on its' Committee an R.F.D. and respected Gun Maker who is regularly consulted by, and works for, various Government Agencies.

Registered Firearms Dealers

1. RFD Registration

The Club feels that the current R.F.D. registration system works well, and adding further restrictions would only increase administration costs and hamper trade. Many, if not all, Police Forces and Firearms Units will know the dealers in their area, and already have strong working relationships with them.

2. Place of Business

The Club sees no need for a change in this area

3. Gun Shops

The Club feels that Gun Shops should not have blacked out or frosted windows. The reasoning behind this view is firstly because of security. If the front window is blacked out it would be easy to break into a shop and proceed to empty the shop without anyone noticing through the front windows.

It is not suggested that Firearms should be kept in the front windows, but traditionally along one wall in the shop secured in accordance with regulations, with the interior of the shop being lit at night to deter possible theft.

In the window the shop should continue to display associated shooting goods, accessories and supplies.

Secondly, we should avoid turning gun shops into places with an atmosphere similar to “Private” or Sex Shops, and to be the subject of ridicule and ill-informed gossip.

The Sport of Shooting, and lets try to remember that Shooting **is** a Sport, and one of the remaining few, (if not the only one!) at which the UK consistently excels in International Competition, already suffers from a poor, unjust and undeserved reputation.

It should also be left to the individual shop owners as to whom they let into their shop. If they wish to admit young people into their shops then surely this should be their decision, provided of course that they adhere to the legislation covering the various items on sale.

Surely, with all the problems being caused by the current “Gun Culture”, it would be better to try and educate young people about the legitimate, safe and disciplined Sport of Shooting, which bears absolutely no relationship to, and has no links with, the “Gun Culture” and the problems it is causing in today’s society. This must be a better way forward than to exclude them from gun shops, thereby denying them the opportunity of contact with the Sportsmen and Women who frequent gun shops, and who use their guns in pursuit of their sport in a safe, legal, and disciplined environment.

4. Period of RFD Registrations and Renewals

Again, the Club feels that as stated, there is already regular ongoing contact between the police and the R.F.D., the period therefore should not be changed.

On the question of an R.F.D.’s Licence because of failing to trade to a substantial extent, the Club has some reservations

about how much is meant by “substantial”. How can this be measured on a fair and equal basis? Some small dealers may only do a small amount of trade, this should not mean they lose their R.F.D. Licence.

However, if a dealer is not trading at all, and has not done so for a long period of time, then they should provide “good reason” for keeping their R.F.D. Licence.

5. Removal of an R.F.D. from the Register

The Club feels that the current process works effectively and change is not necessary.

6. R.F.D. Servants

The Club feels that the current process works well, and to try and define the word “servants” in law could prove difficult, and lead to problems.

It must be remembered that the term “servants” is used to describe many different people who are used by the R.F.D. in many diverse roles, from those involved in transportation to those who operate the machinery. To try and impose a rigid description of each and every role would be virtually impossible, and any attempt to do so is extremely likely, on a practical basis, to cause problems with interpretation of the law in the future.

Other Outlets for Sales and Marketing of Guns

Internet Sales; Imports; Domestic Trade; Newspaper and Telephone Sales; Mail Order Deliveries

This is an area that is constantly changing to meet market requirements, and ever increasing demands for better customer service.

The Club does not have a lot of experience in these areas of the market, however, one thought does come through very strongly, and that is that all sales of firearms and shotguns to individuals should take place on a “face to face” basis.

Retailers should provide, and in most cases probably do provide, information about safety, and the legal requirements to enable a shooter to possess a particular gun.

As for new criminal offences being brought in to restrict this kind of trade, again, this is something that the Club recommends is examined by a new advisory committee. It should be borne in mind that it will require a flexible regulatory framework, perhaps under delegated powers to the new advisory body, to enable the legal requirements to reflect progress and change in the market place.

On the subject of mail order deliveries in connection with internal trade, i.e. amongst dealers, this should be allowed to continue for obvious reasons relating to business needs.

PART 5. AMMUNITION

Shot Gun Cartridges

Whilst the Club feels that it is correct that a shot gun licence should be produced in order to purchase cartridges, it has reservations about controlling them on the Licence, and ultimately, what would be gained from this?

The first reason for this view is that many shotgun shooters tend to purchase cartridges in large quantities (1000 rounds) due to obtaining a price discount for this, which is acceptable as “good reason”.

The second reason is the extra administration costs this would entail for the already very busy Firearms Officers across the country.

Under the current system, Licences would fill up very quickly with recorded purchases, and with so many shotgun licences, the extra paper alone would have a significant impact on costs.

Component Parts of Ammunition

The Club feels this is one area where legislation **should** be changed. Presently, an individual can purchase everything needed to make a complete round, without the need to produce a Firearms Licence.

The Club feels that to purchase these component parts an individual should demonstrate “good reason” by producing their Firearms License.

As for the question of controlling component parts, by, say, putting primers onto a Licence, the Club has its reservations.

This is because firstly, primers are purchased in boxes of 1000; Secondly, due to the constant research and development by

homeloaders, and the various different shooting disciplines they may shoot with one rifle/calibre, requiring different types of loads, it is not inconceivable that 4 different types of primer could be used for one calibre.

Thirdly, this would again place a large burden on already very busy Firearms Officers and again, the administration costs would be high. A Firearms Licence would begin to resemble this White Paper" (!) causing major confusion.

It must be remembered that a primer is a very small component and in reality, with the best will in the world, nobody is going to be counting them.

To a certain extent, the other components have the same drawbacks, and there can certainly be as many variations for one calibre as there are for primers.

Expanding Ammunition

As the Club is involved primarily in shooting disciplines which have paper targets, it could be assumed that there is no need for its Members to use expanding ammunition.

Whilst this assumption is correct, in that expanding ammunition will make the same hole in a paper target as normal ammunition, there is the issue of the supply and availability of factory ammunition to be considered.

It should be noted that for certain calibres and rifles, only expanding ammunition is available to purchase, and this has meant that people wishing to shoot these calibres have had to resort to hand loading in order to carry on shooting.

One good example of this is the popular .303 calibre, the main rifle being the historic Lee Enfield. Stocks of this ammunition are dwindling, with decent ammunition becoming increasingly rare and more expensive.

However, there is a ready supply of expanding ammunition in this calibre, which could be used for target shooting.

The Club would therefore like to see the current ban on expanding ammunition lifted, and at the very least, exemptions granted for the above reasons.

PART 6. OTHER ISSUES

Miniature Rifle Ranges

The Club is controlled by strict legislation, and guidance, which is always implemented to a high standard at all times.

While miniature rifles are actively shot by Club Members, these are held on Firearms Licences where required, and fall under the control of the Range Safety Officer when they are used.

The Club feels that this is not an area where it can comment, but would hope that owners/operators of these ranges will put their own responses forward.

The Club feels however that it would be a loss to the public and the world of shooting, if these ranges were to disappear, because apart from bringing enjoyment to the general public, they also provide what could be a first introduction to the Sport of Shooting which could lead to people taking up the sport.

Exemptions for borrowing firearms on private premises

The Club feels that this exemption should continue, as long as the individual is being supervised by a Licence Holder at all times. After all, the more individuals introduced to the Sport of Shooting in a safe, supervised situation, the better it is for all concerned.

Firearms used in theatrical, film and television productions

The Club does not have a lot of experience in this area, but does feel that firearms should be supervised by an individual who is licensed to hold them.

Other exemptions from the need to have a certificate

As long as these exemptions continue to provide no cause for concern, the Club feels they are justified in modern circumstances.

Target shooting clubs

1. Club Criteria

The Club feels that current extensive criteria, and the way they are applied, are adequate.

The Club fully understands why this criteria is needed, and always ensures that the criteria is met, by constantly reviewing and updating its internal procedures.

There is one area where the Club would like to see some positive changes, and that is Guest Days.

Currently, the criteria covering guest days is complicated, and instead of encouraging guests, it has opposite effect.

Surely people who are interested in the Sport of Shooting should be encouraged to visit clubs, rather than being put off by all the "red tape".

After all, while they are attending a club as a guest, they are strictly supervised at all times.

2. Target shooting locations

The Club feels that as long as a shooter has a Firearms License, and are experienced, they should be allowed to shoot on a privately run range. The greatest element of safety is the actual shooter themselves, and they are ultimately responsible for every shot fired.

3. Target shooting disciplines

The Club feels that if this will help achieve a uniformed approach by the Licensing Authorities to the criteria concerning “good reason”, then this can only be a good thing. Obviously, every single shooting discipline would have to be included in this list to make it comprehensive.

Practical shooting would be included on this list, and would have to be broken down into the different disciplines that take currently take place e.g. Practical Shotgun and Practical Rifle.

Appeals process against licensing decisions

The Club has every confidence in the fairness of British Law, but does realise that bringing individual shooting related matters before the Court is time consuming and costly to all parties concerned. For this reason, the Club believes that an Appeals Tribunal could be a better first option.

Obviously, it would have to include impartial representatives from the Shooting Community as well as other representatives.

This would ensure that in the eyes of the person making the appeal, the process was fair.

If the appeal was rejected, the shooter would be free to appeal to the Courts, but in practice, the number doing this would be small, having already had their appeal refused by a Tribunal on which their fellow shooters sit.

The Club feels that License Holders should be allowed to appeal against a police decision to add a condition to a Firearms Licence.

British visitors permits

The Club feels that the present rules are responsible for restricting International Shooting in this country and basically, they are time consuming and cumbersome. The visiting shooter already holds a European Firearms Permit, surely this is double handling. Are we in Europe or aren't we?

As for other visitors, the original passport system could be re-adopted.

CONCLUSION

As previously stated, the Rustington and District Home Guard (incorporating Hangleton) Rifle Club is a progressive Club which will embrace and react positively to change.

However, this must be change which benefits everyone concerned, including the Sport of Shooting.

It must be change which is based on clear, logical decision, made by Committees who understand all the factors involved and the possible implications of the changes they are considering.

This can only be achieved by involving expert, impartial representatives from the Sport of Shooting to participate in the change process.

What MUST be avoided at all costs is a repeat of the previous changes to legislation that greatly affected the Sport of Shooting, and which were made based on decisions governed by emotion and on political considerations.

It is the hope of this Club that this Consultation Paper is the first step to a more open process of decision making which will bring changes that have positive benefits for the Sport of Shooting, and ultimately help it take its rightful place amongst the popular Sporting Pastimes of England, shrugging off the previous prejudices and ignorance that it has suffered from in the past.

IN CONNECTION WITH THE GOVERNMENT'S MANIFEST PLEDGE IN 2001, NOT TO PLACE ANY FURTHER RESTRICTIONS ON THE SPORTS OF SHOOTING AND ANGLING, THE CLUB HOPES THAT THE GOVERNMENT WILL NOW HONOUR THEIR PLEDGE

This response has been compiled on behalf of the Rustington and District Home Guard (incorporating Hangleton) Rifle Club by Club Members and Firearms License Holders Ms. Rosie Cowley and Mr. Sean Mika.

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