

BRITISH SHOOTING SPORTS COUNCIL**ANNUAL REPORT****2018****Contents**

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Cover picture by Graham Downing

FOREWORD

2018 was another busy year for BSSC, with the responses to the consultations on antique firearms, and to those on high powered (.50 cal), MARS and Lever release rifles, knives etc which resulted in the Offensive Weapons Bill. A great deal of work was done with the air weapons review, on the EU Firearms Directive, and on many other issues. Some success was had with .50 cal rifles by putting the case that legitimate ownership was not a risk, and successful lobbying in the Commons had an effect. Opposition amendments, however, showed the depth of ignorance, misinformation and possibly prejudice against shooting sports there is amongst our Parliamentary representatives.

I think that given the present uncertain political climate we must be even more vigilant, cohesive and proactive. We are facing clear and increasing dangers from the various anti shooting elements ranged against us. They include some prominent personalities who are given an inordinate amount of media coverage, not to say social media. To counter this, all the organisations in the British Shooting Sports Council should, in my opinion, be proactive and build relationships with politicians and opinion formers wherever and whenever they can.

I remember as an MP after the appalling events at Hungerford and Dunblane, many shooters who did not use semi-auto rifles or pistols kept their heads down and thought it would not affect their particular pastime. It is clear that is not the case, the antis will not stop. We must educate politicians of all parties that legitimate shooters are not a threat. This serves to highlight the importance of all shooting organisations working together in a coordinated and effective way. BSSC has the pre-eminent role in this project.

Martyn Jones

Vice President

THE COUNCIL'S OFFICERS

PRESIDENT	The Lord Glentoran CBE (to March)
VICE-PRESIDENT	Martyn Jones
CHAIRMAN	Jonathan Djanogly MP
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 (to March) Jack Knott (from March)
CLAY PIGEON SHOOTING ASSOCIATION	Iain Parker (from August)
DEACTIVATED WEAPONS ASSOCIATION	Barry Johnson
GUN TRADE ASSOCIATION	John Batley (to July) Simon West (from July)
HISTORICAL BREECHLOADING SMALLARMS ASSOCIATION	Derek Stimpson
INSTITUTE OF CLAY SHOOTING INSTRUCTORS	Malcolm Plant
MUZZLE LOADERS' ASSOCIATION	Chris Smith

OF GREAT BRITAIN

NATIONAL RIFLE ASSOCIATION

Andrew Mercer

NATIONAL SMALLBORE RIFLE
ASSOCIATION

Ken Nash

PREPARATORY SCHOOLS RIFLE ASSOCIATION Mary Eveleigh

SCOTTISH ASSOCIATION FOR COUNTRY
SPORTS

Alex Stoddart (to
November)

SPORTSMAN'S ASSOCIATION
OF GREAT BRITAIN & NORTHERN IRELAND

Mike Wells (to May)
Savvas Toufexis (from May)

UNITED KINGDOM PRACTICAL
SHOOTING ASSOCIATION

Adam Rowsell

CO-OPTED MEMBER

Jim McAllister

HONORARY LEGAL ADVISER

Mark Scoggins

ABBREVIATIONS

APPG:	All Party Parliamentary Group
ATT:	Arms Trade Treaty
BADA:	British Antique Dealers' Association
BASC:	British Association for Shooting and Conservation
BMA:	British Medical Association
CA:	Countryside Alliance
DEFRA:	Department for Environment and Rural Affairs
DUP:	Democratic Unionist Party
ECHA:	European Chemicals Agency
EFP:	European Firearms Pass
EU:	European Union
FAC:	Firearm Certificate
FACE:	European Federation of Associations for Hunting & Conservation
F&GP:	BSSC's Finance & General Purposes Committee
FLO:	Firearms Licensing Officer
GP:	General Practitioner
HSE:	Health & Safety Executive
MARS:	Manually Assisted Release System
MEP:	Member of the European Parliament
MLAGB:	Muzzle Loaders Association of Great Britain
NABIS:	National Ballistics Intelligence Service
NFLMS:	National Firearms Licensing Management System
NGO:	Non-Governmental Organisation

NPCC:	National Police Chiefs' Council
PAS:	Publicly Available Specification Standard
REACH:	EU Registration, Evaluation, Authorisation and Restriction of Chemicals
RFD:	Registered Firearms Dealer
T&R:	BSSC's Technical & Research Committee
TNIAG:	Themed National Independent Advisory Group
UN:	United Nations
WFSA:	World Forum on Shooting Activities

Annual report 2018

Overview of the year: 2018 has been a period of slow progress following the considerable activity in late 2017 preparing responses to the Home Office consultations on antique firearms, 'Fifty cal' rifles, 'faster firing rifles' and certain types of knives, the review of air gun legislation and the DEFRA consultation on a ban on the sale of objects containing ivory. We have had no response so far on the antique firearms front with two meetings held with the Home Office. A meeting was held with Nick Hurd, the policing Minister, to discuss progress on fees for prohibited weapon authorities and rifle club approval, deactivation, air guns and '50 cal' and 'faster firing' rifles.

Air weapons review: Following the Commons adjournment debate about the control of air guns held on the 9th October 2017, a decision was taken to review the controls with stakeholders, rather than hold a formal consultation, and the review documents were distributed to stakeholders on the 12th December. The deadline for responses was the 6th February 2018. The specific issues were: access to airguns by children, safekeeping, manufacturing standards, post sale modification to increase power levels and the merit, if any, of introducing licensing for lower powered air weapons. In the event the Home Office received over 55,000 responses, mostly concerned with feline welfare, so a formal Government response was likely to take some time.

The Home Office raised some questions about controls on air guns. Currently, it is an offence for a person under the age of 18 to have an air weapon or ammunition with them except under four specified circumstances. A proposed new clause would remove two of the exceptions: the one for persons of 14 or over to have the weapon on private premises with the consent of the occupier, and the other for persons under the age of 18 to possess an air gun when under the supervision of a person who is at least aged 21. If adopted, this would mean that under-18s could possess air weapons only if they were doing so as a member of an approved target shooting club; or they were using an air rifle at a shooting gallery where the only firearms used are air weapons or miniature rifles not exceeding .23 inch calibre. This proposal would criminalise back garden family instruction on safe use of an air gun and also family target practice. It is no exaggeration to say that these proposals, if adopted, would strike at the heart of shooting in Britain. The Home Office was also considering clarifying and strengthening the offence of failing to take "reasonable precautions" to prevent access to air guns whenever

under-18s are on the premises. “Reasonable precautions” would include locking the weapon out of sight when not in use and storing the ammunition separately. The gun would not need to be locked in a gun safe, however. BSSC had raised some questions about these proposals and awaits a response. The anticipated Government response to the public consultation on air weapons was not forthcoming during 2018. Ministers had rejected Opposition amendments tabled to the Offensive Weapons Bill and were considering non-statutory measures such as education and enforcement. The Gun Trade Association continued with discussions with the Home Office about a communications campaign on airgun safety.

British Shooting Sports Council: Meetings of the Technical & Research Committee and Finance & General Purposes Committee took place on the 18th January 2018. Agenda items for the former included the Policing and Crime Act, firearms fees, the Firearms Rules, deactivated firearms, Scottish licensing issues, the Home Office ‘Guide’ to firearms legislation, the Commonwealth Games, the HSE Sub-sector Guide on explosives and possibly new controls on some antique firearms. Every one of these issues were still under discussion at the end of December. The Annual General Meeting took place on the 15th March. Sadly, Lord Glentoran had decided not to stand again for election as President because of ill-health. Martyn Jones was elected as a Vice President and as a Vice Chairman. Jonathan Djanogly was re-elected as Chairman and Bill Harriman as Treasurer. Jim McAllister was co-opted as an Officer without Portfolio. The accounts for 2017 were formally adopted. The AGM was followed by a Council meeting at which issues raised in Committees and an impending meeting with the Minister were discussed. Also considered was the retirement of David Penn, the Secretary. There had been two nominations to succeed him when he stood down in March. Graham Downing was selected as Secretary Designate. It was agreed that there should be dual working period of about six months.

On the 10th April a workshop for Council members and Association nominees on the use of social media by shooting organizations was conducted by Professor Andrea Luminati. This provided much valuable advice on the considerable benefits and pitfalls of social media. The Technical & Research Committee met on the 3rd May. Agenda items included the implementation of the Policing and Crime Act, firearms fees and medical evidence, deactivated firearms, Scottish legislation, the revision of the Home Office’s ‘Guide’, the Offensive and Dangerous Weapons Bill, the proposed ivory ban, the General Data Protection Regulation, social media training and the NABIS conference on gun crime.

At the Council meeting on the 12th July Derek Stimpson was elected unopposed as Chairman of the Technical & Research Committee, succeeding Graham Downing of the Countryside Alliance, who had stepped down following his appointment as BSSC’s Secretary Designate. The T&R Committee undertakes the greater part of the BSSC’s political work, and Derek is to be congratulated. Jack Knott was appointed by the Countryside Alliance to be their BSSC representative. The main agenda items for the meeting were the Offensive and Dangerous Weapons Bill, the Home Affairs Committee’s intention to report on ‘serious violence’, the proposed ivory ban, the Practitioners Group meeting, and the Health & Safety Executive’s Shooters Guidance. The Finance & General Purposes Committee and the Technical & Research Committee met on the 13th September. At the former, consideration was given to the initial draft for the budget for 2019. At the latter, matters discussed included progress of the Policing & Crime Act. NABIS was now suggesting that between 5% and 11% of firearms used in crime were antiques but media interest was shifting to the growth in illegal import of modern pistols and fully automatic weapons.

The Council met on the 25th October. Matters discussed included the budget for 2019, contact with NABIS on the obsolete cartridge list, the DEFRA Ivory Bill, the European Firearms Pass after Brexit, relations with Thames Valley Police and the lack of progress on EU requirements on the marking of firearms imported from outside the EU, which has led to problems with Border Force over conditions on import licenses. The Offensive Weapons Bill was also discussed. The Technical & Research Committee met on the 6th December. Matters discussed included possible procedures for firearms whose status may change with the implementation of the Policing and Crime Act, medical issues, and a report that the campaign in Parliament to remove Fifty cal rifles from the Offensive Weapons Bill had been a significant one, with 74 MPs, including all DUP members, signing the amendment. Opposition had been limited, but there was still a danger that a prohibition could be re-introduced in the Lords. Jonathan Djanogly and his Parliamentary colleagues were congratulated for their efforts by members of the committee. The Fifty Calibre Shooters Association recorded its thanks for the work undertaken by BSSC and in particular BASC and the NRA. The removal of the Fifty cal ban from the Bill would give the Home Office an opportunity to consult on a number of firearms issues.

Commonwealth Games 2022: Following intervention by the BSSC, it is anticipated that a decision on the inclusion of shooting sports in the 2022 Birmingham Games will be made in 2019. British Shooting is hopeful, and shooting is a highly regarded event in the opinion of many Commonwealth countries. It was noted that Mr. Vladimir Lisin, a Russian steel tycoon and President of the European Shooting Federation since the 30th of November 2018 is keen to see shooting included within the Games.

DEFRA Ivory consultation: Ivory has been long used for practical or decorative purposes on weapons and has its legitimate place in the world of arms. Currently, there is no ban in force on the sale of worked ivory that pre-dates the 3rd March 1947. A Parliamentary debate on the ivory trade in February 2017 had aroused a lot of media interest. Faced with a call to ban all ivory sales, DEFRA put out a consultation paper with a deadline of the 29th December, to which BSSC responded. On the 3rd April DEFRA announced a proposal to ban the sale of ivory whatever its age. It proposed, however, that an object containing less than 10% by volume of ivory and made before 1947 would avoid the ban as would the ‘rarest and most important items of their type’. This is not equitable, as musical instruments will escape the ban if they contain less than 20% by volume of ivory. On the 21st April the Secretary discussed the proposed ban with Mark Dodgson, General Secretary of BADA (the British Antique Dealers’ Association), who was determined to pursue a more equitable outcome, including an exemption for objects with up to 20% by volume of ivory. BSSC and HBSA supported this proposal. In response to pressure from MPs the Government announced a consultation on extending the scope of the Bill to protect hippos, walruses and narwhals. The Ivory Bill being considered by Parliament was amended to include a power for ministers to extend the proposed ban on selling items made from elephant ivory to other ivory-bearing species covered by the Convention on International Trade in Endangered Species (CITES). The British Antique Dealers Association (BADA) has reported that despite its efforts to encourage amendments, MPs have been very reluctant to do so and the best that could be achieved in the third reading debate was a suggestion from Sir Hugo Swire that the Lords should take account of the concerns raised by the antique dealers. Apart from defining the size of a portrait miniature and rendering the Bill capable in future of being extended to the ivory of any animal, the Bill moved to the Lords virtually unchanged. In the Upper House the matter was debated extensively at its third reading on the 13th November. A large number of anomalies were raised, but these made little headway against the Government proposals. The Government remains intransigent over a ban on sales of all but

objects judged to be a pre-1918 item of outstandingly high artistic, cultural or historical value. The Ivory Bill received Royal Assent to become law on the 20th December. The Act is expected to come into force in late 2019. Environment Secretary Michael Gove said: ‘It is an extraordinary achievement to have passed this Act of Parliament. The Ivory Act is a landmark in our fight to protect wildlife and the environment. The speed of its passage through Parliament shows the strength of feeling on all sides of the House on this critical issue.’ Once commenced, the Act will introduce a near-total ban on dealing in items containing elephant ivory, regardless of their age, within the UK, as well as export from or import to the UK. A narrow and carefully defined set of exemptions will be created to establish a new compliance system that would allow owners to continue to trade in exempt items. Tough new penalties will be introduced for those found guilty of breaching the ban, including fines and possible imprisonment.

EU Firearms Directive 2017/853: An EU Commission meeting took place on the 31st January to discuss marking of firearms and alarm guns (i.e. blank firers). There is a provision in the Directive that marking for a firearm that is of particular historical importance shall be determined in accordance with national law, which will protect heritage items and museum collections. The only member states to request that the EU Commission recognize their national deactivation specifications as being equivalent to the EU’s were the Czech Republic, the Netherlands, Spain and the UK. The Czech Republic, the Netherlands and Spain subsequently withdrew their applications. Since the EU was revising its deactivation specifications again, the outcome was uncertain, particularly as the EU appeared to be changing its mind to require that all deactivations placed on the market will have to comply with the new EU specification, even those recently deactivated to its current standard. At the time of writing, it is understood that the European Commission has not yet responded to the Home Office’s request under Article 10b (4) for the current UK 1995 deactivation procedures to be recognised as equivalent to the EU specification, thus permitting firearms deactivated to this specification to be traded again. The other major issue raised by the Directive concerned the marking of firearms. The Commission has yet to lay down the requirements for the marking of component parts, and this had caused difficulties over the wording of import licences. The question as to who would be responsible for marking as yet unmarked firearms and component parts remains unresolved. The Gun Trade Association has been progressing the marking of firearms and parts and was trying to ensure that the Home Office did not unduly constrain the timescale within which an imported firearm could lawfully be marked since the number of organisations competent to undertake such work was limited.

European Chemicals Agency: This organisation was becoming more active in the firearms field. It has released a statement saying that measures were needed to regulate lead ammunition in terrestrial situations. There was a suggested timescale of 5-10 years. Evidence of environmental damage caused by lead ammunition continues to mount.

FACE UK: FACE is the European Federation of Associations for Hunting and Conservation of the EU. A meeting of FACE UK was held on the 20th March. Matters discussed included lead in ammunition, Brexit and the FACE UK Communications Working Group/Biodiversity Working Group meeting. FACE UK met again on 16th October and discussion was resumed about the International Humane Trapping Standards and the management of invasive alien species. FACE is closely involved in the EU’s Directive on the marking of firearms and essential parts of firearms and ammunition, on which a workshop had been held in Brussels. BSSC had submitted on behalf of FACE UK a response to a request for information on the use of non-lead shot in the UK.

Firearms Licensing Officers: A new accredited NPCC training regime for Firearms Licensing Officers was launched in May. There has been substantial input from the BSSC and some of its member Associations.

Good Practice Guide for Registered Firearms Dealers: The Metropolitan Police have produced a guide for dealers in their area which could well be adopted by other forces. It held a workshop for RFDs in the Met area on the 11th January, to which BSSC members who sit on the Met's Independent Advisory Group contributed.

Health & Safety Executive: The planned 'road test' for the draft sub-sector 'ER 2014 'Guidance for Firearms Users and Associated Trades' on the storage of shooters' powders has continued to be delayed, pending further fine tuning of the text, sourcing of better illustrations and finding the finance for publication. A further meeting of the subgroup working on the HSE's 'guidance' was held on the 5th July. This was to address any lack of clarity in a guide intended for hobby shooters and retail dealers, and to remedy any omissions. BSSC was represented by the Secretary and Dr Sandy Robertson (MLAGB). Also attending was Danny Kay, a former police officer who runs a firearms and explosives consultancy. He was of considerable assistance in improving the text, as was Ian MacDonald Watson, the current Chair of the Sub-Group. Revised drafts were circulated and additional sections were drafted on ammunition collecting and training in safe loading practices. It is hoped that the HSE will be able to include the publication of the Guidance in its budget for 2019-2020.

Home Affairs Committee: The Home Affairs Committee undertook an inquiry into Serious Violence, part of which would consider gun crime, beginning in July. This Committee sought to create a Serious Violence Strategy. The concerns to be addressed were: Tackling the misuse of drugs, County Lines (the organised expansion of metropolitan drugs gangs into market towns and rural areas), early intervention and prevention, supporting communities and local partnerships, effective law enforcement and criminal justice responses. The BSSC made a submission to the Committee on the 14th August pointing out the weaknesses in the Government's strategy and proposing some proportionate alternative measures.

Home Office Firearms Fees: No response from the Home Office has yet been received to the BSSC's request for a further 'round table' meeting on the proposed increases of fees for Prohibited Weapon Authorities, Rifle Club Approvals and Museum Firearms Licenses. Fees were however on the agenda for the meeting with the Minister Nick Hurd on the 26th March, postponed from the 31st January. We understand that fee proposals have been under discussion with other Departments. 'Fifty cal' rifles and 'faster firing rifles', deactivated firearms, the EU Directive and the air gun review were discussed. There had been an on-going exercise to establish the number of applications refused and certificates revoked on medical grounds. On the 9th October the Home Office advised that there would be an announcement shortly on the fee scales for prohibited weapon authorities, rifle club approval and museum firearms licenses but nothing further transpired during the reporting period.

Home Office 'Guide on Firearms Licensing Law': Considerable work has been done by Home Office staff on the non-statutory parts of the 'Guide'. The statutory and non-statutory sections will be published separately. The first tranche of drafts of chapters 2, 3, 8, 9, 16 and 18 were received for comment on the 28th March. These covered non-statutory issues. No additional drafts have been received.

Home Office legislation: With regard to the implementation of the Policing and Crime Act 2017, the Home Office held a meeting on the 22nd January to consider the responses to the consultation on antique firearms, followed by a second meeting on the 12th February. BSSC supported the significant expansion of the Obsolete Cartridge List. It did not however, consider removals from the existing obsolete cartridge list to be proportionate. If such removals were proposed, the BSSC insisted that the historical and financial value of the affected firearms must be safeguarded. The Home Office was already looking at delaying the submission to Parliament of the Statutory Instruments relating to antiques, although there has been discussion on additions to and subtractions from the ‘Obsolete Cartridges List’. Work on antiques had still not been completed at the time of writing this report.

With regard to the Home Office’s consultation on dangerous weapons, which included Fifty cal rifles, ‘rapid firing rifles’ and knives, the Minister had advised that the Home Office’s response to this consultation was still being worked on and would not be made available for several months.

Work on the Offensive Weapons Bill progressed and, following interventions by Jonathan Djanogly and Sir Geoffrey Clifton-Brown with the Home Secretary and with Victoria Atkins, the Parliamentary Under Secretary of State for Crime, Safeguarding and Vulnerability, a ‘technical’ meeting took place between civil servants and representatives of BASC and the BSSC on the 13th June. With regard to the ‘Offensive and dangerous weapons’ consultation, seeking a ban on Fifty Cal rifles and MARS and other ‘faster firing’ rifles, and tighter controls on corrosive substances and knives, a BSSC submission had been written.

With regard to the Offensive Weapons Bill which included a ban on Fifty cal rifles and faster firing rifles such as the MARS and tighter controls on corrosive substances and knives, the passage through the Commons had been the responsibility of Victoria Atkins. Jonathan Djanogly and Sir Geoffrey Clifton-Brown met her to put the BSSC’s case. The Offensive Weapons Bill received its second reading on the 27th June.

A wide-ranging group of hostile amendments laid by Labour MPs were in the end not proceeded with. These included website display of an offensive weapon in a threatening manner, the payment in cash for an antique firearm, the compulsory keeping of a register of the sale of antique firearms and introducing controls on shotgun ammunition. Labour did however bring back at Report stage two of their anti-shooting amendments. These were NC3, the removal of the Section 11(4) exception for miniature rifle ranges, a matter in which the Home Office already had an interest, and NC4, the possession of components of ammunition with intent to manufacture. It may be that some or all of these proposals could be raised during the forthcoming consultations on firearms issues which would take place in 2019. Sir Geoffrey Clifton-Brown (Chair of the APPG for Shooting and Conservation) and Jonathan Djanogly had been talking to the Home Secretary and together to Victoria Atkins, the Home Office Minister responsible for seeing the Offensive Weapons Bill through Parliament, and some important progress was achieved. The good news was that the proposed ban on ‘Fifty cal’ rifles had been removed from the Bill. The Minister had asked for a report on security of storage of Fifty cal rifles. She had done this to enable consultations to take place on other firearms issues. Another piece of good news was that a wide-ranging group of hostile amendments laid by Labour MPs were not being proceeded with. These included a ban on the website display of an offensive weapon in a threatening manner, the removal of the Section 11(4) exception for miniature rifle ranges, the requirement that common carriers be licensed to transport firearms, the possession

of components of ammunition with intent to manufacture, a ban on the payment in cash for an antique firearm, the compulsory keeping of a register of the sale of antique firearms and the introduction of controls on shotgun ammunition.

Home Office medical evidence working group: There had been considerable debate within the police service over the lack of consistency still prevailing in the obtaining of medical evidence relating to certificate applicants. Many GPs in England and Wales were not co-operative. The BSSC had called for the re-convening of the working group but was advised that the Home Office was preparing revised guidance. It was anticipated that this may echo the Scottish procedure. This would make a medical response mandatory (with a possible alternative approach to be used only if it had been found that it was impossible to involve a GP) and would expect the applicant to bear any fee. Because GP surgeries are commercial enterprises a fixed fee cannot be imposed and fee levels currently run at between £20 and £200. This is a most unsatisfactory situation. A meeting was called by Nick Hunt, Head of the Tackling Crime Unit, to discuss the medical issues. It was made clear that any acceptance by the BSSC of a fee for an initial records check paid to a GP by an applicant for a FAC or SGC would be conditional on the following points: the installation of a confidential enduring marker (which would facilitate continuous assessment) within the applicant's medical records, the payment of a fee being a 'one off', either on first application or first renewal, and the introduction of a 10-year certificate, which would enable significant financial savings. Nick Hunt stated that he would look at: the use of a copy of the applicant's medical record (available from the National Health Service) in lieu of a GP response; a ten-year certificate; the lack of clarity of wording in the letter to GPs; training issues with the College of Policing and an appeals process. He would continue discussions with the BMA and would consult the BSSC regarding statutory guidance.

The Home Office suggested that medical issues might be addressed by statutory guidance, but no further meeting has as yet been called. Lack of progress on medical matters is of concern to the All Party Parliamentary Group on Shooting and Conservation (APPG) and Nick Hurd, the Policing Minister, has been questioned by the group. It has been noted that Registered Firearms Dealers will also in future be subject to medical checks. The continuing inconsistency in the application of the 'enduring marker' to the medical records of certificate holders remains a major concern. Full compliance by GPs in the application of the marker, along with continuous monitoring by the police, would be required if the medical records check is to be a one-off process leading to the introduction of a 10 year certificate. The extension of certificate life has been regularly raised by the APPG. It was also noted that the EU Directive makes it clear that no responsibility for the grant or refusal of a certificate should attach to medical professionals engaging in the licensing process. BSSC will continue to press the medical issues and Nick Hurd has maintained that he is keen to put in place a statutory regime, which would include a duty on doctors to report, a reasonable fee and an extension of certificate life. BSSC would support such an outcome.

Lead in ammunition: Within the EU lead in ammunition remains a very serious issue. The EU has been moving towards a wider definition of wetlands, which would be seriously disadvantageous to Britain, and indeed to most Northern European nations, and was expected to go to the EU Parliament in mid 2018. A revised definition would probably be implemented via a Regulation, which might come into force before Britain leaves the EU. As predicted, ECHA (the European Chemicals Agency) is expected to commence work on its report on the restriction of the use of all lead ammunition, not just shot, over all habitats.

Membership: The Scottish Association for Country Sports has resigned from the BSSC.

Metropolitan Police Club Engagement event: BSSC representatives attended the meeting on the 18th April to launch the Met's new good practice guide for target shooting clubs, into which BSSC had had input. Rob Aitkin, in charge of armed policing and firearms licensing, made it clear that the Met strongly supported target shooting clubs. Roger Arditti, in charge of the firearms licensing office, indicated that the Paris terrorist shootings had alerted the police to possible sources of firearms for terrorists, one being theft from clubs. Speakers covered mental illness and how to recognise different mental problems and engage with club members who might be experiencing difficulties. Also addressed were personal security, particularly when going to or coming from the range, club security, security of doors and windows to PAS 24 (Publicly Available Specification standard) and the need for care when using social media. This was a useful and instructive meeting. The Met's 'Good Practice Guide' was subsequently adapted for national use.

Metropolitan Police Independent Advisory Group: This Group met on the 14th June. Agenda items included a staffing update, updates on meetings with Approved Clubs and RFDs, digitisation of records, a presentation on the work of the Met's Forensic Firearms Unit and updates on training and medical issues. This Group met again on the 3rd October. The meeting was mainly to evaluate the Met's new online application process for application for the grant or renewal of firearm certificates and shotgun certificates. There was also a discussion on the legal aspects of a 'voluntary surrender' of a FAC or SGC.

NABIS: The planned NABIS conference on 'Working in Partnership to tackle the Lawful to Unlawful Firearms Threat' took place on the 2nd May. Case studies were presented showing links between the 'criminal world' and the 'lawful firearms world'. There were c. 150 attendees, mostly firearms licensing staff. ACC Dave Orford expressed concern that criminals and terrorists could exploit legislative gaps. The Home Office had made it clear that there was no opportunity for new firearms legislation. To keep matters in perspective, only 0.025% of legally owned firearms and shotguns had gone missing in 2017. A tiny percentage was used in crime. Derek Stimpson made a presentation on behalf of the BSSC drafted by David Penn and himself and reviewed by Bill Harriman, Andrew Mercer and Graham Downing. This strongly put the case for proportionality and stressed that ammunition had been the problem rather than antique firearms. If the law on the latter was tightened, legitimate collectors would have to suffer the consequences indefinitely, while the criminals would find another source of weapons. Presentations were given on the Edmunds case, involving large numbers of revolvers, some legally antiques, and substantial quantities of cartridges hand loaded for them. Other operations were the supply of hand-loaded cartridges to gangs by Nazram and Stevenson, a Suffolk hoarder with 17 licensed firearms and 463 unlicensed ones including 139 pistols and 38 machine guns. While there was no evidence of supply to criminals in this case, such 'hoarders' are vulnerable to pressure from criminals. Another operation was against an approved club where two of the officers (one a dealer) had large numbers of illegal firearms. Another certificate holder who also possessed unlicensed firearms came to police attention when he used one to shoot a man who was beating up a girl beside his house. Another case involved a RFD who was blackmailed into supplying numbers of sawn-off shotguns which had been entered in his register as destroyed. Another case was of a certificate holder and members of his family who supplied hand-loaded cartridges to criminals, filling the gap in the market after Edmunds had been apprehended. There was discussion as to why a few dealers went bad and on how to identify warning signs. It was clear that perceived weaknesses in the legislation illustrated by the operations referred to will be addressed and RFDs can expect more searching police activity.

NPCC National Firearms Licensing Management System: A formal decision has been made to enable NFLMS to continue in use for another three to five years. It is to be upgraded, in particular to introduce computerised applications and fee payment. It was hoped that these improvements would be achieved and piloted by the end of the year. It will have to cope with the EU Directive's mandatory requirements regarding computerised transfer of dealers' records of transactions and some form of database for deactivated firearms. If either is proved to be impracticable, then some form of stand-alone data base would presumably be required in order to comply with the EU Firearms Directive. BSSC stands ready to continue to have input into the development of NFLMS. The pilot scheme for online certificate applications in the Metropolitan, Thames Valley and Hampshire police force areas went live on 6 December and the first online application was received on that afternoon by Thames Valley Police.

NPCC Criminal Use of Firearms Themed National Independent Advisory Group: A meeting was held on the 21st March. Subjects discussed included an update of trends in gun crime. There was discussion of the role of the Police and Crime Commissioners in violence prevention. They work with communities through the Violence Prevention Alliance and mobilize support for legislation (e.g. over Zombie knives). Terrorism and crime initiatives are competing for funds. It may be more effective to treat the perpetrator of a crime as a patient. Up to two thirds of victims of violent crime refuse to co-operate with the police. There was discussion of sentencing guidelines, of which there is only one relating to firearms crime (Section 19), and the role of the Sentencing Council. The Offensive Weapons Bill had reached its second reading. It was understood that the BBC was planning a Panorama programme about gun crime which would include antiques. There was discussion about the increased use of surrender schemes, which forces now have the power to organise locally. A meeting was held on the 12th September. This was mainly devoted to the TNIAG's submission to the Home Affairs Committee. There was a discussion about treating gun violence as if it were a multi-agency public health problem. This had worked well in Baltimore and the agencies involved, such as schools and hospitals, tended to give a higher priority to tackling gun violence when working together. A meeting was held in Birmingham on 5th December 2018. NABIS had stated that while the number of reported criminal firearms discharges was considerably below the peak in 2006-7, it was nonetheless on the rise again. In 2017 the figure had been 547, but the figure for 2018 thus far was 573, of which shotgun discharges represented 36%. Since 1st October there had been 121 discharges of which 34% were from shotguns. There had been a 20% increase in shotgun theft and NABIS would be analysing how stolen shotguns were moving around the UK. A significant number of firearms are used only once in crime, and there existed a strong correlation between narcotics and firearm carriage/usage. There was a seasonal peak in firearms discharges in July/August. The National Crime Agency had expressed its determination to continue working with European colleagues post-Brexit to monitor and intercept the supply lines of illegal imports. Border Force has contingency plans in place for the aftermath of Brexit. NPCC has been planning another national firearms surrender in August 2019 and NABIS was supporting forces in pursuing this goal.

Panorama: The BBC1 programme aired at 8.30pm on 20th August covered the topic of antique firearms used in crime and the Paul Edmunds case. Derek Stimpson, who had spoken at the NABIS conference in May, was interviewed to cover BSSC's and HBSA's perspective. The filming location was in the National Rifle Association Museum, for which considerable

thanks are due to the NRA. All of the relevant points were covered and amongst them were the following:

- Preservation of heritage – once an antique firearm is gone it is gone forever.
- The relationship between the private collectors and museums.
- Ammunition which is not commercially available in the UK as a criterion of antiquity. Such ammunition has to be hand loaded which, if it is not on certificate, is a criminal act.

To criminalise thousands of law-abiding collectors for the acts of a few criminals is not proportionate. Antiques account for only 5% of firearms crime and modern firearms are readily available to criminals. The “loophole” referred to by NABIS will be closed shortly when the obsolete cartridge list becomes statutory. All the cartridges on the list are still obsolete: bans do not work, afterwards the law-abiding citizens have to live with the new law forever whilst the criminals will still acquire firearms and continue to break the law. After Dunblane, gun crime with handguns rose. A register of antiques is not practical; in this case ‘antique’ really means certain obsolete cartridge revolvers. The BSSC has been and will continue to be much involved with the Home Office, NABIS, the police and other parties in this process.

Policing and Crime Act: Most of the provisions of the Act are now in place. There has been some discussion between the Home Office, NABIS and the Historical Breechloading Smallarms Association on the Statutory Instrument defining antique firearms, For any pistol whose status changed from Section 58(2) ‘antique’ to Section 5 ‘prohibited’, the possessor (should he not have legally disposed of it before the Statute came into force) would be obliged either to surrender the pistol and receive compensation or to apply for a firearm certificate to continue to possess it or seek a variation to an existing certificate. No ‘good reason’ would be required, but the possessor could not sell or give away the pistol which would ultimately be surrendered on the expiry of the certificate. The BSSC and HBSA have been seeking formal confirmation that the owner could opt for Section 7(1) or 7(3) status. This would enable the owner to sell or otherwise dispose of his pistol, thus helping both to preserve an artefact of historical importance and to maintain its value. The pistol would have to meet one of the Section 7 criteria or be relevant to an existing collection theme. There will be a requirement for forensic identification of certain pistol designations, particularly indeterminate .32 calibre firearms where the designation was unclear. Clarity of definition is also required by the trade.

Practitioners’ Group: A BSSC Practitioners Group meeting was held on the 6th February. On the agenda were computer issues (including the impact of anticipated EU requirements for the keeping of records of deactivated firearms and of dealers’ transactions), the fees consultation, medical evidence and problems relating to continuous monitoring and the introduction of ten year firearm and shotgun certificates. A meeting was held on 9th October at which Roger Arditti, Firearms Licensing Manager for the Met, took the chair. Several new police initiatives were announced. It had been suggested that measures should be adopted to establish competence with regard to entry into quarry shooting with a rifle. A paper was being prepared. Forces were working together in a steering group to establish what Firearms Enquiry Officers need to know countrywide. A total of 28 learning outcomes had been established with the College of Policing and were being adopted by three trial forces: the Met, Durham and Devon & Cornwall. The Police Scotland air weapons certification team had been disbanded and its work subsumed into area commands. There would be a peak in air weapons license renewals in 2022. An agreement for standards of firearms licensing in the oil industry for flare ignition had been agreed and signed off by all the oil companies.

Standing Conference on Countryside Sports and Management: A meeting was held on the 1st November 2018. Following the recent internal review, the Standing Conference has been re-named the Countryside Forum. Following the review of international and national legislative activity the remainder of the meeting was devoted to the recovery of farmland birds. The Breeding Farmland Bird Index in 2016 showed a decline of 56% since 1970, but where effective measures are put in place, numbers rose. Measures helpful to game rearing could also benefit farmland species.

Visitors' permits: Foreign shooters are significant contributors to the rural economy and Britain offers unique opportunities for driven game shooting and stalking. It is therefore important that the procedure for issuing Visitors' permits should function smoothly and without undue delay. BSSC was advised that some Firearms Licensing Offices had been restricting Visitors' permits to a short period of validity instead the norm of up to one year. This could be very inconvenient as many foreign visitors shoot several times during the season and prefer to leave their guns with UK RFDs between shooting days. Some also arrive in the UK, shoot, then visit other countries with their guns, following which they return to the UK for more shooting during the season. It therefore makes sense, and reduces bureaucracy for FLOs, to extend the validity of the VP for such frequent visitors rather than insisting on multiple applications during the shooting season. BSSC considers that this should be agreed as best practice. The Home Office has confirmed that, in the event of a 'no deal' Brexit, existing European Firearms Passes granted to UK certificate holders would no longer be supported by the British Government and that EFPs issued by other EU member states would not be recognized in Britain. If a British shooter wished to hunt or target shoot in Europe he would have to negotiate with his destination and with each country on his route.

World Forum and the United Nations: With regard to the Arms Trade Treaty the UN was criticised for continuing to focus on procedural and organisational matters rather than developing processes to reduce trafficking and diversion of conventional arms.

The Arms Trade Treaty Review meeting took place in New York in June 2018. The main concern was over additional marking requirements, especially for ammunition. While ammunition marking was opposed by the US and Israel, the draft text was adopted and there will now be increased focus on marking of ammunition within the UN Programme of Action. The proposed marking technology is Brazilian and involves inserting a laser mark in the extractor groove of the cartridge, thus enabling the marking and identification of batches of ammunition. The Fourth Conference of State Parties to the ATT was held in Tokyo and was attended by 77 of the 97 parties. NGO attendance was heavily skewed to the arms control side. In the view of World Forum, the ATT is failing. Only 58% of the member states are paying their way, and the ATT Secretariat's budget is \$418,000 short of where it should be. Only 73% of states have submitted their initial report on import/export figures, and only 54% have submitted an annual report. Enthusiasm amongst the state parties appears low.

WFSA has announced its intention to hold a workshop in Rome in February 2019 to discuss both lead ammunition and wider threats to shooting.

Correspondence concerning this report, or other matters
relevant to the British Shooting Sports Council,
should be addressed to:

Graham Downing
Secretary
British Shooting Sports Council
PO Box 79
Halesworth
IP19 1BB

Telephone: 01986 834154

Email: secretary@bssc.org.uk

Website www.bssc.org.uk

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