

BRITISH SHOOTING SPORTS COUNCIL

ANNUAL REPORT

2009

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FOREWORD

It is, as always, a great pleasure for me to write a short foreword to the British Shooting Sports Council's Annual Report.

The BSSC, under the most able secretarial skills of David Penn, has had another exceptionally busy year, with much progress in numerous areas being achieved.

Without the continuing support of the Bodies who comprise the makeup of Council and their various representatives, the BSSC simply would not exist. I have long felt that the BSSC plays a major role in enabling the various shooting Associations to work together in the spirit of co-operation which is absolutely key if we are to continue to support the shooting sports.

I would like to take the opportunity of paying tribute to the support which we have received from two Members of Parliament who retire at the forthcoming General Election. Martyn Jones and Martin Salter have been great supporters and we shall miss them.

Also, Bill Wiggin MP stepped down as a Vice-Chairman in March 2009: I would like to express my sincere thanks on behalf of Council to Bill for his support and advice in the past.

Doubtless the work of Council will not diminish in 2010, and I know that there will be no weakening in our determination to support, defend and promote the shooting sports for which we all share a common passion.

The Earl of Shrewsbury & Talbot DL

THE COUNCIL'S OFFICERS

| | |
|----------------|--|
| PRESIDENT | The Earl of Shrewsbury & Talbot DL |
| VICE-PRESIDENT | Brian Carter |
| CHAIRMAN | The Lord Glentoran CBE |
| VICE-CHAIRMEN | Martyn Jones MP Bill Wiggin MP (to March) Tobias Ellwood MP (from March) |
| TREASURER | Graham Downing |
| 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 CLAY TARGET SHOOTING GROUNDS | Ian Clifton |
| ASSOCIATION OF PROFESSIONAL SHOOTING INSTRUCTORS | Christopher Miles |
| BRITISH ASSOCIATION FOR SHOOTING AND CONSERVATION | Bill Harriman TD |
| COUNTRYSIDE ALLIANCE | Graham Downing |
| CLAY PIGEON SHOOTING ASSOCIATION | Phil Boakes |
| GUN TRADE ASSOCIATION | John Batley |
| INSTITUTE OF CLAY SHOOTING INSTRUCTORS | Roger Hill |
| MUZZLE LOADERS ASSOCIATION OF GREAT BRITAIN | Ken Hocking |
| NATIONAL RIFLE ASSOCIATION | Glynn Alger |
| NATIONAL SMALLBORE RIFLE ASSOCIATION | Geoff Doe |
| SPORTSMAN'S ASSOCIATION OF GREAT BRITAIN & NORTHERN IRELAND | Alan Westlake |
| UNITED KINGDOM PRACTICAL SHOOTING ASSOCIATION | Graham Gill |

ABBREVIATIONS

ACPO: Association of Chief Police Officers (England and Wales)
 AFEMS: Association of European Manufacturers of Sporting Ammunition
 ANPAM: Associazione Nazionale Produttori Armi e Munizioni sportive
 ATT: Arms Trade Treaty
 BCAP: Broadcast Committee of Advertising Practice
 BVP: British Visitor's Permit
 CASA: Coordinating Action on Small Arms (a UN organization)
 CIEH: Chartered Institute of Environmental Health
 CLA: Country Land and Business Association
 CUF: Criminal Use of Firearms, an ACPO Secretariat
 EFP: European Firearms Pass
 EU: European Union
 FAC: Firearm Certificate
 FELWG: Firearms and Explosives Licensing Working Group, an ACPO body
 GGE: (United Nations) Group of Government Experts
 HSE: Health and Safety Executive
 IANSA: International Action Network on Small Arms
 ISACS: UN CASA's International Small Arms Control Standards
 NaBIS: National Ballistics Intelligence Service
 NFIC: National Firearms Intelligence Cell
 OEWG: UN Open Ended Working Group
 REACH: EU Registration, Evaluation and Authorisation of Chemicals regulations
 RRO: Regulatory Reform Order
 RFD: registered firearms dealer
 SAAMI: US Sporting Arms and Ammunition Manufacturers Institute
 SGC: Shot gun certificate
 SOCA: [Serious Organised Crime Agency](#)
 TKAP: Tackling Knives Action Programme
 TNIAG: Themed National Independent Advisory Group
 TTF: Transit Task Force, a World Forum Group
 UN: United Nations
 UNIDIR: UN Institute for Disarmament Research
 VCR Act: Violent Crime Reduction Act 2006
 WFSA: World Forum on the Future of Sports Shooting Activities

Overview of the year

The year has seen progress on many fronts, on the whole slowly at home but with increasing momentum within the United Nations. Bill Wiggin MP stood down as a Vice-Chairman and Tobias Ellwood MP was appointed to succeed him on Council. The Countryside Alliance organised another very successful National Shooting Week on behalf of the Council. A successful Parliamentary Dinner was held to enable an exchange of views with Conservative decision-makers. Discussions continued with the Home Office and police on the updating of Home Office 'Guidance' on the Firearms Act and on possible amendments to the Firearms Act 1968 by means of a Regulatory Reform Order. A short-list of topics for amendment to the Act was agreed with the Chair of the ACPO Firearms and Explosives Working Group. Following the final report by the Calman Commission, the subject of devolution of legislation on air weapons to Scotland has remained a live issue, as it had been in 2008. The outcome of the Home Office consultation on possible changes to the law on deactivated firearms is still awaited. New themes at home included the Broadcast Committee of Advertising Practice's Review of Broadcast Advertising Standards, to which the Council and several of its members responded robustly, attacking both the existing and the proposed prohibitions on advertising the shooting sports in the broadcast media. The use of lead in ammunition continues to be debated. Towards the end of the year discussions commenced on the level of fees charged for firearms certification. Internationally, the impetus of United Nations activity on matters relating to Small Arms and Light Weapons has quickened considerably, particularly in relation to the proposed Arms Trade Treaty and the CASA (Coordinating Action on Small Arms) Project on International Small Arms Control Standards (ISACS). All the signs are that 2010 will be at least as busy as 2009.

ACPO Criminal Use of Firearms Themed National Independent Advisory Group

The Secretary attended all four of the Group's meetings, held on the 27th January, 28th April, 21st July and 5th November.

During the January meeting, the Group was given a very good introduction to NaBIS, the National Ballistics Intelligence Service, NFIC, the National Firearms Intelligence Cell, which is tasked with the broader intelligence picture, and SOCA, the [Serious Organised Crime Agency](#), which deals with serious and organized crime. There was further discussion of the revised Terms of Reference for the Group, which would focus on sources of illegal firearms and gun crime prevention, rather than 'post event' matters such as witness protection.

In April there were further discussions concerning the TNIAG's terms of reference, membership and funding. There was detailed discussion of the Home Office's proposals regarding deactivated firearms and on an ACPO paper concerning witness protection. On

behalf of the Group's Chair, Dr Derrick Campbell, the Secretary presented a report on the working of the Group to the ACPO CUF Steering Group meeting on the 30th June.

The meeting in July was mainly concerned with Section 39 of the Violent Crime Reduction Act: A presentation was given by Metropolitan Police CO 19 on converted blank firers with a view to influencing the ongoing discussions on the definition of blank firers within Section 39 of the VCR Act. There was also an issue of 'convertibility' in terms of the EU Directive 91/477/EEC on control of the acquisition and possession of weapons, as amended. There was considerable discussion covering legitimate uses for such blank firers, the likelihood that such a ban would mainly affect the law-abiding, and how the figures for converted blank firers quoted by the Met were arrived at. This was followed by discussion of sentencing policy in firearms cases, mandatory sentences, judicial discretion and strict liability legislation.

In November the main business was a presentation by ACC Sue Fish, Chair of the ACPO Criminal Use of Firearms portfolio. This covered changes to CUF's role and work for the next twelve months, issues relating to the availability and supply of firearms, new technology to detect firearms misuse, proposed changes to legislation on blank firers and deactivated firearms, concentration on preventative measures for gun crime and concern about the complexity of existing legislation. Other points that arose at the meeting were that NFIC, the old National Firearms Intelligence Cell, has now been fully integrated into NaBIS. NaBIS has an increasingly active 'Knowledge and Communications' section, which is proactive, keeping all 43 English and Welsh forces up-to-date on gun crime issues, acting in an advisory role and ensuring factual accuracy. Scotland would become the fourth NaBIS hub in January. There was increasing co-operative effort within Europe to reduce internet sales of firearms. There was considerable discussion of the likely impact of the recent Court of Appeal rejections of appeals on firearms cases. In part these comments on heavy sentencing were seen as a response to a build-up of firearms cases.

The work of the Group frequently concerns issues that may affect the legitimate sporting use of firearms, so our direct input on such use and on technical and legal matters is of great value. The Group now benefits from the membership of Mark Scoggins, the Hon. Legal Adviser to the BSSC. It is expected that additional members will be appointed during 2010.

All Party Group on Shooting and Conservation

The Secretary is a member of this Parliamentary group which is convened by BASC and provides an important forum. The Secretary attended the meeting of the 9th June at which Dr John Harradine gave a presentation on lead in ammunition. This was a wide-ranging paper covering contamination issues and the impact of scientific research and legislation. There was discussion of substitutes for lead and the management of change. The aim was to minimise adverse impacts and maximise the consumption of healthy game. Oversight

of these very important issues will continue within the BSSC's Lead and Noise Abatement Working Group.

Amendment of the EU Directive 91/477/EEC on control of the acquisition and possession of weapons

During 2009, low-key discussions continued with the Home Office on aspects of the Amendments to the EU Directive which had been agreed by the EU Parliament in 2007. Areas of concern centred on the additional requirements imposed on the gun trade and a potential problem over two not entirely compatible definitions of 'parts' in the amended Directive. These culminated in a meeting to discuss trade-related issues, including the definition of 'blank firers', registered firearms dealers and record keeping, on the 9th November. Further meetings are anticipated during the first half of 2010, as implementation of the Amendments is due by July and some of the trade-related aspects will have considerable long-term impact.

Annual General Meeting and Annual Luncheon

The meeting was held on the 19th March. The Earl of Shrewsbury was re-elected as President, and Brian Carter as Vice-President. The Lord Glentoran was re-elected as Chairman, Martyn Jones MP as a Vice-Chairman and Graham Downing as Treasurer. James McAllister was co-opted onto Council. Sadly, Bill Wiggin MP had decided not to offer himself for re-election as a Vice-Chairman, owing to pressure of Parliamentary business, and the Council is most grateful to him for his positive support, very helpful advice and willingness to sponsor Parliamentary events. The AGM and Council Meeting were followed by the Annual Luncheon, where the Council's guests included Tobias Ellwood MP, Kate Hoey MP, Rob Gray (Countryside Alliance and organiser of the very popular National Shooting Weeks), Graham Widdecombe (Home Office), John Leighton-Dyson (then Performance Director of British Shooting), Brinley Salzmann (Defence Manufacturers Association) and Malcolm Russell (Foreign & Commonwealth Office). Subsequent to the AGM, Tobias Ellwood very kindly agreed to be co-opted as a Vice-Chairman. He is a former army officer and keen pistol shot.

Broadcast Committee of Advertising Practice (BCAP) Review of Broadcast Advertising Standards

A review of regulations for broadcast advertising had last taken place in 2002 for television (2000 for radio) before BCAP assumed this responsibility. The regulations at that time effectively banned advertisements on these media for firearms, gun clubs or shooting (with a partial exception for clay pigeon shooting) and were based on the false and indeed insulting assumption that firearms and shooting are, in themselves, likely to

cause widespread offence. Despite the best efforts of the BSSC, no relaxation of these regulations was achieved at that time. A further across-the-board review, not relating solely to the advertising of firearms and shooting, was undertaken in 2009. It included an intention to extend the prohibition to replica firearms and further to extend the limitation of the radio advertising of clay pigeon shooting. The Council and several of its constituent Associations took the opportunity to respond in robust terms. The BSSC strongly disagreed with the bias of the existing Code against the legitimate sporting use of firearms and objected to the pejorative language used in the BCAP Consultation. It pointed out in detail that the BCAP's understanding of firearms and the law relating to them and their use was inaccurate and very likely to mislead other consultees. The Council took issue with the BCAP's view that sporting firearms were items 'liable to encourage the commission of crime', and were intended to be offensive weapons or 'to murder or maim'. It questioned BCAP's belief that the public at large have any concerns about a legitimate and popular participation sport undertaken by citizens of good character and provided evidence to the contrary, the BSSC's 2008 National Shooting Week having attracted widespread favourable media attention. Media-monitoring had demonstrated that at least 22 million people read or heard about National Shooting Week. This media exposure did not result in a tide of expression of public offence. Existing high-level political support for shooting was underlined and BCAP was given an overview of shooting which underlined its safety, its respectability, its significant contribution to the economy and the high levels of both public participation and international success. The BSSC not only disagreed with any extension of the current prohibition on advertising firearms and shooting in the broadcast media, but also suggested in strong terms that the existing prohibitions be removed. The Council encouraged other shooting organisations and individual shooters to respond. The outcome is awaited with interest.

EU REACH (Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals)

The Secretary attended a meeting of the AFEMS (Association of European Manufacturers of Sporting Ammunition) Expert Group and the International Lead Association, which is advising AFEMS, on the 26th August. The meeting was to discuss data relating to the sporting use in the UK of projectiles made of, or containing, lead for inclusion in AFEMS' report for REACH, which had entered into force on 1st June 2007. AFEMS has been involved long-term in the preparation of the EU ammunition industry's response to REACH. AFEMS' work was discussed at length at the Lead & Noise Abatement Working Group held on the 5th October. The National Rifle Association and Muzzle Loaders Association of Great Britain have contributed valuable papers on reloading, bullet casting and muzzle loading shooting, all activities that had not yet been addressed in the draft report. The Secretary participated by telephone in the AFEMS REACH meeting on the 1st December and the BSSC continues to advise the AFEMS Expert Group. The AFEMS report is scheduled to be completed in September 2010 and this issue will continue to be a significant aspect of the BSSC's work in 2010.

Health and Safety Executive

Following a very productive series of meetings held with the Health & Safety Executive in 2008, the Health (Miscellaneous Amendments and Revocations) Regulations 2009 have been published. The excellent news is that the term of an Explosives Certificate will be extended to five years to allow it to be co-terminous with a firearm certificate or shot gun certificate, and that firearm certificate and shot gun certificate holders will not be charged a fee for their Explosives Certificate. Less satisfactory are some measures affecting explosives licensing for game fairs and dealers, where some expected improvements and simplifications have not materialised and there are significant fee increases. At the time of writing, the BSSC is considering its response.

Home Office

Consultation on ‘Guidance’ to the Firearms Act: During 2009 the revision of the Home Office ‘Guidance’, which had got well under way in 2008, slowed down somewhat. A third tranche of largely non-contentious draft revisions was worked on in February and March and further chapters are awaited. The intention is to make the next edition a ‘live’ document which can be consulted (and readily updated) online. In future, the revision process could therefore be gradualist and undertaken at need. Indeed some aspects of the present Guidance will not be subject to detailed review and updating at this point, as they are dependant on yet-to-be-implemented Amendments to the EU Weapons Directive. The participation of the shooting organisations is a key element in the revision process.

Deactivated firearms: Following the Home Secretary’s announcement on 10th January 2008 of her intention to introduce a ‘ban’ on pre-1995 deactivated firearms, the long-awaited consultation paper on further controls on deactivated firearms was announced in Parliament on the 2nd March 2009. Despite the fourteen month wait, the Home Office had not presented any strong evidence that there was a problem, let alone a growing one. The Home Office’s own statistics demonstrate that only two reactivated handguns were used in crime in each of the years 2004/05, 2005/06 and 2006/07 whilst there were 0, 2 and 1 other reactivated firearms respectively in those years. Deactivated firearms that had not been reactivated were used in 1, 4 and 2 cases. The police had however suggested that ‘...despite the low numbers in official statistics, the true scale of criminal misuse of deactivated guns is much larger and must be tackled’ which implied that the police’s own figures were wide of the mark.

The Home Office had estimated that there are about 180,000 deactivated guns in circulation which have been certificated by the Proof Houses. The number of pre-1989 deactivations was more difficult to estimate but was likely to be significantly higher. It

estimated that the current value of a deactivated gun ranged from £100 to £2,500, with a minimum average value of £350 and a total value of £105 million.

The consultation paper offered six options. None of these involved the confiscation or licensing of deactivated firearms already in private possession, but could affect their sale or transfer and their value. These options were:

1. To treat deactivated firearms as ‘realistic imitation firearms’ within the terms of the Violent Crime Reduction Act;
2. To make deactivation standards mandatory;
3. To require pre-1995 deactivations to be upgraded to 1995 standards
4. To sell deactivated firearms only through a registered firearms dealer.
5. To make it an offence for prohibited persons to possess deactivated firearms.
6. To take no action.

[The Council](#) and several of its constituent Associations took a robust line in their responses. The BSSC recommended that the best way forward would be Option 6, do nothing, pending the production of a report by NaBIS, the National Ballistics Intelligence Service, based on the analysis of all deactivated/reactivated firearms recovered by the police. Of the other five Options, the Council was only able to support Option 5, to prohibit certain convicted offenders from buying deactivated guns, and then only provided that such legislation incorporated protection for the vendor who had acted in good faith.

The Home Office had indicated its wish to protect the interests of the legitimate collector, and, given the detrimental effects most of the proffered options would have on both the transferability and the financial value of existing collections, the avoidance of such harm should be given great weight. The Council also noted that ‘The Government is therefore seeking an effective but *proportionate* response to the problem.’ (Our emphasis). The Council is unable to understand how a proportionate response can be achieved unless the problem is itself properly quantified and analysed.

Bill Harriman of BASC, John Batley of the Gun Trade Association and the Secretary attended a meeting with Alan Campbell, Parliamentary Under-Secretary of State at the Home Office, on the 29th October. Assurances were given that any change in the law would be proportionate and based on evidence, but the c. 100 responses to the consultation were still under consideration. A meeting to discuss the evidence regarding deactivation with NaBIS was expected to take place early in 2010.

Crime & Security Bill: Air weapons have continued to maintain a high political profile and not solely in Scotland. A petition from residents of North Norfolk and others regarding the threat to people and animals from the lack of controls over access to air guns, and seeking the government’s assurance regarding the enforcement of existing laws on sale and use, was presented to the House of Commons in July. The Home Office replied robustly in October, pointing out recent changes to the law and advising that air gun offences were at their lowest since the 1980s. The Home Office has been considering further measures intended to curb the misuse, including accidental misuse, of air guns, and the result has been a clause relating to safekeeping in the Crime & Security Bill

which received its first reading on the 19th November. The second reading was to take place on the 18th January 2010.

The relevant section reads:

- (1) It is an offence for a person in possession of an air weapon to fail to take reasonable precautions to prevent any person under the age of eighteen from having the weapon with him.
- (2) Subsection (1) does not apply where by virtue of section 23 of this Act the person under the age of eighteen is not prohibited from having the weapon with him.

There then follow various defences.

Very short notice was given of the wording, and the only concession given to the shooting interest was the removal of ‘all’ from ‘...all reasonable precautions...’ in the original draft of (1), despite efforts by the BSSC to have the safekeeping proposal limited to instances where an under-18 year old had been found with an airgun in a public place without good reason. This Bill went well beyond any “crime reduction” measure, as the aim is to make it an offence to fail to store securely even where no young person in fact gets hold of an air gun, and this puts this measure squarely in the realm of Health & Safety, akin to section 3 of the Health & Safety at Work etc Act 1974 which penalises exposure to risk (i.e. the possibility of danger) notwithstanding that no one is in fact harmed. This measure is not likely to prevent tragedies arising out of carelessness. A parent who might thoughtlessly leave an airgun unattended in the garden is highly unlikely to act any differently because (and even if the parent knows) it is an offence to leave it unattended when children are around. Should this become law, it would not and could not achieve its stated aim of raising airgun owners’ attentiveness to safekeeping (and will instead act only unfairly) unless it is widely and prominently publicised. The BSSC will continue to work towards a more proportionate outcome.

Draft Firearms (Electronic Communications) Order: A draft response prepared by the Gun Trade Association to Home Office consultation on this draft Order (which has the objective of permitting in law the use of electronic communication in serving various notices prescribed within the Firearms Act, a practice already widely if not universally used for notifying the police of firearms transactions) was discussed at the Technical & Research Committee meeting on the 2nd July. The agreed response was subsequently submitted to the Home Office and it is understood that the Order will be laid in April 2010.

Firearms fees: During December consultations were initiated with regard to firearms fee levels and the police activities for which fees are charged. There has been no increase in fees for certificate grant and renewal since January 2001 and the Home Office has been keen to review them for some time. The BSSC and Gun Trade Association have submitted initial papers on the matter and a paper is expected from ACPO, taking into

account initial discussions at the Practitioners Meeting on 17th December. A review of firearms licensing fees in other European countries indicates that the present fee levels in Britain are already among the highest in Europe. This proposal will be a major element in BSSC's work for 2010.

Firearms in Scotland: The Calman Commission to consider aspects of Scottish devolution issued its 'First Report', on 2nd December 2008. This was essentially preliminary. It made no recommendations, although it did include firearms licensing as one of a group of issues where a case could be made for devolution. Initially responses had been by invitation and neither shooting organisations nor anti-gun groups appeared to have been approached. In a subsequent statement reported in *Scotland on Sunday* on the 15th February 2009, Sir Kenneth Calman did particularly highlight devolution of firearms licensing as a possibility. BSSC, BASC and the Gun Trade Association had sent in robust representations. All made clear the undesirability of devolving firearms legislation and their opinions may be viewed on the Calman Commission's website. On the 9th March Justice Secretary, Kenny MacAskill met the Home Secretary to discuss firearms and alcohol issues. During the meeting, Mr MacAskill called again for a pilot licensing scheme for air weapons and also expressed for a desire for the devolution of firearms legislation to the Scottish Government. The Commission issued its final report on the 15th June. So far as firearms legislation is concerned, the Commission's conclusions were as follows:

(5.156) '...it does believe that in the instance of firearms and their potential for misuse there are strong arguments for maintaining control at a UK level. The Commission believes that there are advantages in having common offences relating to the misuse of firearms across Great Britain and that there could be serious disadvantages in having different, uncoordinated policies and therefore does not recommend devolving generally the subject of the Firearms Acts.'

This sensible conclusion was undermined by its further statement:

(5.157) The Commission is persuaded, however, that there may be merit in devolving legislative competence for air weapons about which the Scottish Government has made particular representations to the UK Home Office. It appears to the Commission that if there is appetite to deal with air weapons differently in Scotland than south of the border then the advantages of enabling the Scottish Parliament to do so outweigh the disadvantages. The Commission notes that air weapons have been clearly defined in legislation and recommends that powers over weapons of this kind are devolved to the Scottish Parliament. This could be achieved through an Order under the Scotland Act. RECOMMENDATION 5.13: The regulation of airguns should be devolved to the Scottish Parliament.

The BSSC does not consider this to be well-founded and will continue its objection to any such devolution.

At meetings at the Home Office on the 29th and 30th October it became clear that the devolution issue was very much 'live' and fears concerning devolved air weapon legislation being used as a political bargaining counter were being realised. On the 25th November the Scottish Secretary Jim Murphy introduced a White Paper, announced that a Cross-Party Steering Group to consider further devolution had been set up and stated that a Scotland Bill would be introduced, but not until after the next election. The Conservatives have made it clear that Labour's White Paper will not bind any future Conservative government and that they will consider devolution but not as an immediate priority. The Scottish government is continuing to press very hard for immediate action on the air weapon issue. This proposal will continue to be of major concern in 2010.

Knife issues in England & Wales: On 11th March 2009 the government committed to spend an extra £5m to tackle knife crime, and to target the minority of young people who commit the most serious violence. The new funding will be used to extend the government's Tackling Knives Action Programme (TKAP) for another year, and to include two new police force areas: Kent and Hampshire. Recently published NHS data for 2007-08 (which pre-dates TKAP), showed an 8% reduction in the overall number of admissions to hospital for assault by sharp object. Provisional Home Office TKAP management information shows that since June 2008, police have conducted more than 150,000 stop-and-searches, and seized 3,000 knives. The BSSC will continue to monitor Home Office proposals regarding knives in case they could adversely affect those engaged in field sports.

Policing & Crime Act 2009: This portmanteau Act contained a section on 'offensive weapons', included to clarify the law on import controls, which had been a subject of dispute as a devolution issue between the Home Office and the Scottish Government. The Act reserved import controls to Westminster. For all practical purposes so far as the public is concerned the controls over offensive weapons remain as they have been since the Criminal Justice Act 1988.

Violent Crime Reduction Act: At the time of writing, the draft specifications for blank firers which have been the subject of much work in the past, led by the Gun Trade Association, remains with ACPO for comment. It may require further consideration in the light of interpretation of the wording of the EU Weapons Directive.

Working Party on the revision of firearms forms: The previous meeting having been held on the 28th October 2008, illness and military service abroad had delayed the next until the 19th May. It had been hoped that a streamlining of the 'one for one' variation process could be achieved by a change to the Firearms Rules, but legal advice was that a change to legislation was required. Good progress was made, however, on the proposed short application form for variations, which is now very close to agreement, and the single application form for FACs and SGCs. One important point was the clarification of the need to declare fixed penalty notices (other than parking) and formal written cautions. There was considerable discussion on 'medical questions' and particularly on which

‘medical or physical conditions’ needed to be declared. Some good progress was achieved and it is hoped that momentum will pick up in 2010.

Lead & Noise Attenuation Working Group

The Group met on the 27th April. The agenda included REACH (Registration, Evaluation and Authorisation of Chemicals, the EU’s chemical policy) implementation with regard to lead at EU and UK levels, ammunition-related outcomes of the March World Forum meeting, CIEH (Chartered Institute of Environmental Health) guidance on noise from shooting grounds and the re-cycling of spent shotgun cartridges.

The meeting on the 5th October was devoted to information-gathering for the AFEMS report on the EU REACH project (see EU Legislation above).

National Shooting Week 2009

The third National Shooting Week, organised by Rob Gray of the Countryside Alliance, took place between 23rd and 31st May. Around 100 event organisers took part, about the same as last year, with a healthy mix of airgun/rifle clubs and clay shooting grounds, and several thousand people tried shooting for the first time. Equally important is that millions more have learned that shooting is popular, safe and accessible. The event attracted a record level of UK media coverage. A positive article about women in shooting was placed in the Daily Telegraph, arranged by the Countryside Alliance. This was picked up by BBC Radio 5 Live which ran a debate between Rob Gray and Mothers Against Guns. Rob made it clear that shooters would work with anti-gun groups providing they looked to address the real problems in society and did not restrict legal firearms. It was a message that served us very well by making clear our reasonable position.

On the back of that debate, BBC TV News did a positive one-on-one live studio interview with Rob Gray. Over twenty radio and television interviews were also broadcast including BBC South Today and numerous regional BBC and independent radio stations. Numerous regional and local newspaper stories appeared, plus articles on stockbroker and property websites amongst others. Other coverage included a piece for FHM.tv, which enjoys 1.8 million hits.

Political support was received up to Ministerial level and Martin Salter MP, the Labour Party’s spokesman on shooting, said: “I’m delighted that National Shooting Week will take place again this year from 23rd-31st May. When Rob Gray from the Countryside Alliance asked for my support for this new project back in 2006, I was only too happy to help because it is so important to demystify firearms and show the general public that responsible shooting is safe and accessible to all. Happily this successful initiative is supported by all the organisations that belong to the British Shooting Sports Council.”

Olympic pistol shooting

Following a series of meetings in 2008, the Secretary attended a further meeting at the Home Office on the 5th June. There has been progress towards the establishment of a UK-based training programme for aspirant Olympic pistol squad members. The 73% cut in funding for shooting had, however, further restricted the possibilities, particularly for regional training centres for those lower down the performance pyramid. Two MoD Ranges now have Home Office approval for civilian pistol training, but consideration needs to be given to the practicability of upgrading MoD range facilities for which there is now a funding shortage. Prohibited weapon authority issue to elite squad members is proceeding smoothly. The Home Office has agreed to the use of the Melville Range at Bisley and the Bedford Range for Olympic .22 pistol training and, with regard to the Commonwealth Games, three shooters have been given permission to have .32 centre-fire pistols for training in the UK. The BSSC will be happy to continue to provide advice as this is sought.

Parliamentary Dinner

On 3rd March the BSSC held a very successful Parliamentary Dinner in the House of Commons, attended by Conservative policy makers and opinion formers with responsibilities for justice, gun crime, firearms legislation, sport and defence. A wide range of topics was discussed, and contacts were established. A follow-up paper on possible legislative change was subsequently circulated to those who had attended. The BSSC found this to be a most valuable occasion.

Practitioners Group

The Group, chaired by the Secretary, is made up of representatives from police firearms and explosives licensing officers, Home Office, Forensic Science service and BSSC. Three meetings of the Group were held during the year. These continue to be a valuable means of resolving difficulties relating to firearms and explosives legislation and its practical implementation. The Council is most grateful for the work of Matthew Perring (BASC), who has acted as Minutes Secretary for these meetings during 2009.

At the meeting on 31st March at the Home Office, issues discussed included: legislative change using the Regulatory Reform Act; problems regarding appeals against Chief Constables' decisions under several Sections of the Firearms Act; delays in certificate renewals; initial grant of shotgun certificates; conditions on registered firearms dealers' certificates and guidance on Section 11(6). Following the meeting, Adrian Whiting, the Chair of the ACPO Firearms and Explosives Licensing Working Group, circulated a prioritised list of proposals for the proposed Regulatory Reform Order to improve the working of aspects of the Firearms Act. The BSSC endorsed this list, which was

forwarded to the Home Office for consideration. Discussion is also continuing about the precise wording of ACPO guidance in relation to Section 11(6) (Chief Officer approval for a clay pigeon shoot).

The Group met on the 6th August at the NSRA Headquarters. Subjects discussed included possible measures to reduce the impact of the ‘peaks and troughs’ in certificate renewals, the legal status of cup-type grenade launchers, progress on re-drafting Home Office ‘Guidance’, medical reporting on certificate holders, the proposed Regulatory Reform Order, thefts of shotguns and restrictive conditions on registered firearms dealer’s certificates.

The Group met again on the 17th December at the Birmingham Proof House. Subjects discussed included firearms fees, an update on proposed legislative changes via a Regulatory Reform Order, proposals regarding markers on National Health Service records identifying certificate holders, conditioning of firearm certificates regarding sound moderators, police procedures regarding humane despatch of wounded animals and conditions on registered firearms dealers’ certificates. Discussions on sound moderators and conditions on RFD certificates were very positive and progress continues to be made.

Proposed changes to weapon laws in EU member states

The Secretary continues to monitor proposals to change laws regulating firearms or other weapons within the EU and to provide information and advice if requested. This is increasingly necessary as nations study each other’s legislation and international and regional legislation such as the UN Vienna Firearms Protocol and EU Directive 91/477/EEC on control of the acquisition and possession of weapons exert increasing influence. During 2009 Netherlands Police studied air gun use in Britain and were advised by the National Small-bore Rifle Association. Finland continued to debate changes to its firearms laws. Eire introduced new legislation *via* the Criminal Justice (Miscellaneous) Provisions Act 2009 with some good and some undesirable aspects. Certificate life was extended from one year to three, except for existing owners possession of pistols other than .177 air or .22 rim-fire was effectively prohibited, a ‘certificate of competence’ would be required from applicants for firearm certificates and ‘simulated combat’ shooting was banned. Following the tragic school shooting in Winnenden with a licensed 9mm pistol, there have been calls for the banning of other than small-bore pistols in Germany. In response to a request for assistance, the Secretary has provided information, papers and links relating to the effectiveness, or otherwise, of legislation in Britain and Commonwealth countries.

Scottish Government

Custodial Sentences and Weapons (Scotland) Act: The Scottish Government’s Criminal Justice Directorate circulated a response to consultation on the Knife Dealers Licensing Scheme on the 7th April 2009. As anticipated, there has been little in the way of amelioration, other than to delay further the implementation of the scheme. Applications for dealer’s knife licenses should have been received from 1st September 2009, with a 1st

December deadline to guarantee processing by 1st June 2010, the deadline for dealers to be in possession of a valid licence. Prominent signage regarding the minimum age for purchase and an increased period of retention for records (three years, not one) will be mandatory. Other measures such as mandatory CCTV cameras, secure display cabinets, a ban on public display and a register of persons refused a purchase will be left to the discretion of the local authorities undertaking the licensing. It is therefore likely that there will be considerable inconsistency in the application of this legislation. Mercifully, proposals for background checks for purchasers, serial numbering of knives, and further checks and the provision of a referee for sword purchasers were rejected. Definition of a 'non-domestic' knife will be left to the Courts. Registered Firearms Dealers who wish to sell knives and swords will have to apply for the local authority knife license in the same way as other retailers.

Wildlife & Natural Environment Bill: Consultations in Scotland on proposals to modernise certain statutes (including the Deer (Scotland) Act 1996) and consultation closed on the 4th September. Included were measures that would affect deer management, game laws, non-native species and poaching. Following discussion in the Technical & Research Committee, a response prepared by Graham Downing, Chairman of the BSSC's Technical & Research Committee, was sent to the Scottish Government. The BSSC does not support compulsory testing of stalkers (and is thus against a mandatory stalking register); it supports an amendment to the Game Laws, but broadly in their existing form; supports the abolition of both the Game Licence and the Game Dealer's Licence; and supports a new offence of selling a game bird which has unlawfully been killed.

Standing Conference on Countryside Sports

On 30th April 2009 the Secretary attended the 62nd Meeting of the Standing Conference. Subjects covered included the EU's recognition of the vital role of sustainable hunting in maintaining biodiversity, concerns by EU anglers about the inclusion of the catches of recreational anglers in national fish quotas, the impact of EU policy on cover crops, intentions to tidy up the game laws in the UK and new guidance on the Dangerous Dogs Act which could have an unintended impact on working dogs. The main themes of the afternoon's discussions were on set-aside and a multi-purpose countryside

Thames Valley Police Consultation meeting

The Secretary attended a meeting in Reading on the 19th June, called by ACC Nick Gargan to take stock of current arrangements regarding firearms licensing issues and to improve relationships following a period when the grant or renewal of some certificates by this force had been taking an unacceptably long time. Attending from the shooting side were Mike Eveleigh and Alan Booth (BASC), Roger Speak (NRA), Geoff Doe (NSRA), Graham Downing (Countryside Alliance), John Batley (GTA), Alan Overton (Historical Breechloading Smallarms Association), Derek Wiggins (National Gamekeepers' Organisation) and Doug Florent (Oxford Gun Company). Also present were Martin Salter MP, Inspector Ray Howard, Paul Brightwell and Zoe Evans, Thames Valley Licensing and Nigel Dering, the Operational Firearms Commander for Thames

Valley. A presentation from Zoe Evans indicated that Thames Valley was the second or third largest force in terms of numbers of FACs and SGCs. It was currently working to a 60 working day turnaround, but with many achieved in 20 working days. There was discussion centred on staffing levels, workload, the anticipated effect of the imminent ‘bulge’ in certificate renewals, the use of temporary permits and training. There was also discussion of Visitors Permits and European Firearms Passes and Martin Salter undertook to look into the current statutory requirement that the original EFP be sent in as part of the application for a Visitor’s Permit following a briefing from the Secretary. Thames Valley is intending to hold an annual ‘stakeholder’ meeting.

Welsh Assembly Government Consultation on General Licences

The BSSC participated in the consultation process regarding General Licences insofar as these affected the shooting sports and vermin control.

World Forum on the Future of Sports Shooting Activities

[The BSSC is a founding member of the World Forum on the Future of Sports Shooting Activities \(WFSA\), a NGO in Roster Consultative Status with the Economic and Social Council of the United Nations.](#) The work of World Forum continues to be of primary importance to shooting in Britain, since so much legislation is now supranational in origin.

Following the very strong backing for an Arms Trade Treaty at the UN General Assembly on 31st October 2008, at the Arms Trade Treaty Group of Government Experts meeting during the week of 2nd March there was much discussion of the form that a UN body would take to administer any future treaty. Despite strong efforts by New Zealand, the inclusion of civilian arms remains under discussion, as does the inclusion of ammunition. Contact has been maintained with the Foreign & Commonwealth Office with regard to keeping civilian firearms and ammunition out of the proposed Treaty.

With regard to the UN Vienna Protocol, the EU has funded six regional workshops to progress work on marking and tracing and temporary importation (important to civilians travelling internationally with their own firearms).

The Secretary attended the World Forum Sub-committee meetings, Executive Committee meeting and plenary session in Nuremberg on the 11th and 12th March and the Sub-committee and Executive Committee meetings in Velden, Austria, on the 19th and 20th October. The inclusion or exclusion of conventional small arms ammunition in future UN legislation and ‘marking & tracing’ of ammunition remained key issues, and the Secretary, who is a member of World Forum’s Arms Trade Treaty working group, had been asked to present a paper on the subject at Nuremberg. This was very well received. The October meeting was concerned mainly with UN and environmental issues.

World Forum held a major symposium on the Ecological and Economic Benefits of Hunting from the 14th-18th September in Namibia. Developed from an original proposal by the Secretary and Professor Gary Mauser of the National Firearms Association of Canada, this was aimed at Government policy-makers, particularly in developing countries, and demonstrated the benefits of sport hunting and civilian ownership of sporting arms. The symposium enjoyed the strong support of the Namibian Government. 53 delegates participated and it brought together leading scientists and professionals, along with government officials and industry and shooting organisation representatives from around the world. Twenty-six presentations were made, covering scientific studies on hunting and habitat, wildlife management, the economics of hunting, data on environmental and economic impacts, methods of wildlife management and new concepts concerning the role of hunting. Information was included on the 2006 PACEC survey of the economic and environmental impact of the shooting sports in the UK, commissioned by BASC, the Countryside Alliance, the CLA and the Game and Wildlife Conservation Trust.

The ability of civilians to travel internationally with their sporting firearms continues to get more difficult. The old World Forum working group dealing with airline and postal matters was reformed in 2009 as the Transit Task Force under a new Chairman, John J. Jackson III, the Chair of Conservation Force, a wildlife conservation group. The Secretary is a member of the TTF and has participated in two telephone conferences of the Transit Task Force, which is concentrating on establishing contacts with key decision-makers in the major airlines and IATA, the International Air Transport Association, as a preliminary to discussions on making more straightforward the international movement by air of privately-owned firearms. The intention is to hold a workshop in 2010. During the year Jim McAllister of BSSC joined the TTF.

At its plenary session, World Forum makes an ‘Ambassador Award’ to give public recognition to the contribution made by some of the many public figures who have a longstanding interest in the shooting sports. Past recipients have included the author Wilbur Smith, Sir Jackie Stewart and Ugo Beretta. Shooters in Britain were delighted to learn that the 2009 recipient was Colin Greenwood, consultant to the Gun Trade Association, in recognition of his defence and promotion of all aspects of the shooting sports, his contribution to the serious study of firearms legislation and to the protection of the legal rights of firearms owners and shooters. The award takes the form of a magnificent solid silver wheel-lock pistol and powder flask.

There continue to be four current major strands to UN activity concerning firearms, usually referred to by the UN as ‘SALW’ (small arms and light weapons): the long-standing Programme of Action (POA) on illicit trade; the proposed Arms Trade Treaty dealing with legitimate trade and almost certain to include SALW alongside a wide range of conventional arms and ‘dual use’ materiel; the Vienna Firearms Protocol, which is focussed on crime and illicit trafficking and the UN CASA ISACS programme, which is focused on creating a set of international standards for the control of SALW.

The UN Firearms Protocol was on the agenda for the UN Crime Commission meeting in Vienna, on 16th-24th April. World Forum was in attendance. Marking on import continues to be a live issue, and 'Comparative Analysis of Post-Manufacture Marking Instruments and Practices for Small Arms and Light Weapons' by Giacomo Persi Paoli of UNIDIR (UN Institute for Disarmament Research) was published by ISROP (International Security Research and Outreach Programme). The report was paid for by the government of Canada. More activity in this field is imminent.

A Programme of Action on Small Arms (POA) regional meeting was held in Sydney, Australia, on 22nd-23rd June. World Forum members Sporting Shooters' Association of Australia and New Zealand Council of Licensed Firearms Owners were present.

The Secretary contributed to the drafting of a report presented by World Forum to an important UN Arms Trade Treaty Open Ended Working Group (OEWG) meeting in New York on 13th-17th July. IANSA, International Action Network on Small Arms, also addressed the OEWG, as did FAIR, a US group of firearms importers and retailers, who specifically addressed the issue of civilian ownership of obsolete military firearms. There is as yet no actual text for the treaty so it was discussed in concept. Several hundred delegates from over 100 nations reviewed the "feasibility", "scope" and "parameters" of the proposed treaty. The OEWG appears to be moving towards the highest possible international standards for the export, import and transfer of conventional weapons.

There have been two regional meetings, funded by the EU, to enable discussion of the proposed ATT, one in Mexico City in June and the other in Amman, Jordan, in July. In Mexico City there was strong pressure for an ATT to be comprehensive in its coverage of categories of small arms and ammunition, to address both conflict and crime issues (reflecting the high gun crime rates in the region), to be legally binding and to incorporate international humanitarian law principles. Special emphasis was placed on the need to address national licensing procedures, brokering and transfers to 'non-state actors'. There were, however, contrasting views voiced on the nature and impact of any possible ATT. In Amman there was discussion as to whether to aim to make the treaty universal, in the sense of being signed up to by all countries, and as to the level of control. Concern was expressed that an 'unbalanced' ATT might harm the legal trade and encourage illicit trade. Human rights organisations were pressing for the inclusion of international standards for the use of military and security equipment, but others saw the proposed treaty as needing to be objective, non-political and not open to 'interpretation'. It appears that, on the basis of these two regional meetings, there is a fairly general acceptance that the international transfer of conventional arms does have significant problems that are susceptible to reduction by a Treaty, so a Treaty will probably happen, but beyond that there is less agreement on what to control and how to control it. Any ATT will virtually certainly cover small arms in some fashion, so has a significant potential for impact on civilian possession, trade and international movement.

Concurrently with the New York ATT meeting, UN CASA (Coordinating Action on Small Arms) Project on International Small Arms Control Standards (ISACS) held a workshop in Geneva, which the Secretary attended alongside representatives of ANPAM

(the Italian National Association of Producers of Arms and Ammunition) and SAAMI (the US Sporting Arms and Ammunition Manufacturers Institute).

CASA is an ‘umbrella’ organisation for all UN agencies with an interest in small arms and light weapons. It is undertaking a project to draw up International Small Arms Control Standards which goes far beyond the original intention of the UN Programme of Action to combat illicit international trade, and which is a separate initiative to the Arms Trade Treaty. The CASA project will cover national controls over manufacture and civilian access, marking & tracing and issues of crime and young persons’ access to firearms, international trade and national licensing of brokers, manufacturers, dealers and civilian owners. It is expected to complete its work on the English language draft of these Standards in 2010. At the workshop in Geneva the framework for the numerous ‘modules’ which are intended to form the International Standards were discussed. Although the adoption of these standards will be entirely voluntary, any state which signs up to them will be expected to apply them, at least in the longer term. CASA subsequently set up an Expert Reference Group to assist the consultants drawing up the modules. This includes representatives from SAAMI (the US Sporting Arms & Ammunition Manufacturers Institute), ANPAM (the Italian Arms and Ammunition Producers Association), FN/Browning, the Canadian National Firearms Association and the Secretary.

Attendance at both the ATT and the CASA meetings was of considerable importance, as it enabled World Forum and other shooting organisations to establish their positions at a very early stage of discussions. There will be a major international conference on the Plan Of Action on Small Arms and Light Weapons, known as the Biennial Meeting of States, at UN headquarters in New York, during the week of June 14-18, 2010.

In the latter half of 2009 the proposed Arms Trade Treaty continued to be pushed very hard, particularly by the UK and Canada. In its statement to the UN in October Canada incorporated a very important pro-civilian ownership statement in relation to the ATT: Canada “places particular priority on transfer controls to prevent illicit flows, *ensuring responsible civilian possession* and appropriate use of small arms by state officials, stockpile management and disposal, reducing demand for small arms and light weapons for illicit purposes and increased international cooperation and assistance”. The US Administration decided to participate in ATT discussions (it was one of two states to vote against in 2008, under the Bush administration) on condition that they are on a consensus basis (on the 2008 Biennial meeting on small arms and light weapons the UN had broken with the precedent of operating on a consensus basis by going to a vote, which had effectively removed the power of veto by a single state). There will be major preparatory meetings over the next two years, followed by a four week meeting in 2012 to discuss the details of the treaty. Approximately twice the amount of time has been allocated to the process as had originally been envisaged. The Foreign & Commonwealth Office will be holding a meeting for UK ‘stakeholders’ in February and the BSSC has been asked to participate.

There was also rapid progress on the UN CASA ISACS project. The Secretary, with considerable assistance from Council members, had by the year's end advised on twelve of the proposed modules. Most of these contained elements which would not be beneficial to the shooting sports and some required considerable input. The revised drafts were being awaited with much anticipation.

With regard to the United Nations Firearms Protocol an "Expert Working Group for the Development of a Model Law on Firearms" met on November 3rd-5th, 2009. This meeting was primarily concerned with international trade issues and was attended on behalf of World Forum by Mark Barnes of FAIR and Dr. Vito Genco of ANPAM. There will be further meetings in 2010.

WFSA is preparing for meetings regarding the Arms Trade Treaty in Vienna on 11th-12th February 2010, for the major Biennial Meeting of States from June 14th-18th June 2010 in New York and again for a "Preparatory Committee" meeting in New York on 12th-23rd July 2010.

WFSA is working with CIC (the international Council for Game and Wildlife Conservation) on issues relating to the use of lead in hunting. An Inter-Governmental Organisation (IGO) founded in 1928 and based in Austria, CIC is an influential independent advisory body aiming to preserve wild game. It promotes sustainable use of wildlife resources, and plays an active role in the worldwide efforts to keep hunting sustainable and to develop hunting, especially sustainable hunting tourism, into a powerful instrument for conservation, human development and poverty alleviation.

Miscellaneous matters

In April the Secretary assisted Professor Gary Mauser of the National Firearms Association of Canada with regard to an article that he was writing on the control of ammunition.

In April the Secretary had discussions with Neville Rowe, the Principal Policy Officer of Sandwell Council, where a proposal had been made to impose conditions on the possession of legal firearms by Council tenants. Mr Rowe appreciated the security implications and had been advised similarly by the police and others. The proposal was subsequently dropped.

In September the Secretary was consulted about the draft Cadet Shooting Policy by Brigadier John Smales, Chairman of the Council for Cadet Rifle Shooting.

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