



The British Shooting Sports Council



ANNUAL REPORT

2022

BRITISH SHOOTING SPORTS COUNCIL

ANNUAL REPORT

2022

Contents

	Page
Foreword	2
The Council's Officers	3
Association Representatives	4
Abbreviations used in the text	5
Overview of the year	6
Animal Sentience Bill	7
Annual Luncheon	6
Approved Clubs Police Liaison Officers	6
Bisley	7
British Shooting Sports Council meetings	7
Criminal Use of Firearms Prevent Board	8
Deactivation	8
Explosives Regulations	8
Fees Working Group	9
FACE	9
Firearms Safety	10
Guidance to the Police	11
Home Office Minister	11
Lead in Ammunition	11
Licensing delays	13
Medical Marker	13
Online renewals	13
Plymouth	14
Practitioners Group	14
Remote Transfers	15
Scottish Affairs Committee	15
Scottish Practitioners Group	15
Sound Moderators	15
Stakeholder meetings	16
Trophy hunting	16
United Nations	16
Value of Shooting survey	17
World Forum on Shooting Activities	17
Wild Game Guide	18

Cover picture: Walked-up grouse shooting, Inverness-shire
Photo: Graham Downing

FOREWORD

It was a great relief in 2022 to be able to get back to our conventional routine of meeting in person, whether with our member associations or with representatives of the police or Home Office, and a particular pleasure to enjoy the company of our members and guests at our AGM Luncheon, the first to be held after an enforced two year break. However, Covid left a long shadow and not least on firearms licensing.

The temporary suspension of firearm and shotgun certificate grants during the pandemic led to a huge backlog in police licensing work which was compounded by the bedding-in of new Statutory guidance to Chief Officers which brought with it the necessity for additional checks and investigations. Whilst we commend those police forces which have worked hard to overcome these difficulties, much remains to be done to iron out the inconsistencies and provide a level playing field across Great Britain for aspiring shooters and current certificate holders alike. These concerns were central to the review of firearms fees which opened in 2022 and which is ongoing.

Discussions on lead ammunition occupied a great deal of time during the course of the year. Game shooters have already made the decision to move away from lead shot, but the launch of HSE's consultation on restrictions upon the use of lead in all ammunition presented a real challenge for target shooting, as well as for users of small calibre rifles, air rifles and historic firearms, where the options to move to lead alternatives are much more limited. International events, such as Russia's invasion of Ukraine meanwhile shone a spotlight on supply chains and the ability of ammunition manufacturers to supply lead alternatives to civilian sport shooters. The lead debate has of course been running for many years, but we have now entered a critical phase in which the knowledge and skills present within our BSSC member associations are vital to ensuring an outcome that is both fair and workable.

It was particularly pleasing to see the Council's international profile raised considerably during the year, with our central role in the World Forum on Shooting Activities enabling the Secretary to address the United Nations in New York, underlining the willingness of our sport shooting bodies to co-operate with Government and law enforcement to suppress the illicit diversion of firearms. We had other successes at home too, not least the promise by the Policing Minister that the Government intends to remove sound moderators from certificate control. A small step maybe, but a step in the right direction.



Jonathan Djanogly MP

Chairman

THE COUNCIL'S OFFICERS

PRESIDENT	The Lord Robathan PC
VICE-PRESIDENT	Martyn Jones
CHAIRMAN	Jonathan Djanogly MP
VICE-CHAIRMEN	Martyn Jones, Derek Stimpson
TREASURER	Bill Harriman
SECRETARY	Graham Downing

“The aims and objectives of the Council are to promote and safeguard the lawful use of firearms and air weapons for sporting and recreational purposes in the United Kingdom amongst all sections of the community.”

(Extract from the Constitution of the Council)

ASSOCIATION REPRESENTATIVES

ASSOCIATION OF PROFESSIONAL SHOOTING INSTRUCTORS	Chris Miles
BRITISH ASSOCIATION FOR SHOOTING AND CONSERVATION	Bill Harriman TD
COUNTRYSIDE ALLIANCE	James Aris
CLAY PIGEON SHOOTING ASSOCIATION	Iain Parker
DEACTIVATED WEAPONS ASSOCIATION	Barry Johnson
FIFTY CALIBRE SHOOTERS' ASSOCIATION	Scott Wylie
GUN TRADE ASSOCIATION	Simon West
HISTORICAL BREECHLOADING SMALLARMS ASSOCIATION	Derek Stimpson
INSTITUTE OF CLAY SHOOTING INSTRUCTORS	Malcolm Plant
MUZZLE LOADERS' ASSOCIATION OF GREAT BRITAIN	Jon Harper-Smith
NATIONAL RIFLE ASSOCIATION	Andrew Mercer
NATIONAL SMALLBORE RIFLE ASSOCIATION	Graham Burns
PREPARATORY SCHOOLS RIFLE ASSOCIATION	Mary Eveleigh (until March)
SPORTSMAN'S ASSOCIATION OF GREAT BRITAIN & NORTHERN IRELAND	Savvas Toufexis
UNITED KINGDOM PRACTICAL SHOOTING ASSOCIATION	Alex Moreton
VINTAGE ARMS ASSOCIATION	Ian Barclay
CO-OPTED MEMBERS	Jim McAllister David Penn
HONORARY LEGAL ADVISER	Mark Scoggins

ABBREVIATIONS

AFEMS:	Association of European Manufacturers of Sporting Ammunition
APP:	Authorised Professional Practice
APSI:	Association of Professional Shooting Instructors
ASF:	African Swine Fever
AWG:	Ammunition Working Group
BASC:	British Association for Shooting and Conservation
BSSC:	British Shooting Sports Council
CA:	Countryside Alliance
CC:	Chief Constable
CPSA:	Clay Pigeon Shooting Association
DEFRA:	Department for Environment, Food and Rural Affairs
DWA:	Deactivated Weapons Association
ECHA:	European Chemicals Agency
ESSF:	European Shooting Sports Forum
EU:	European Union
FAC:	Firearm Certificate
FACE:	European Federation of Associations for Hunting & Conservation
FCSA:	Fifty Calibre Shooters' Association
FELWG:	NPCC's Firearms and Explosives Licensing Working Group
FEO:	Firearms Enquiry Officer
FLD:	Firearms Licensing Department
FWG:	Firearms Working Group
GCN:	Gun Control Network
GP:	General Practitioner
GTA:	Gun Trade Association
HME:	High Muzzle Energy
HMIC:	His Majesty's Inspectorate of Constabulary and Fire & Rescue Services
HSE:	Health and Safety Executive
IEACS:	European Institute of Hunting and Sporting Arms
IT:	Information Technology
IWA:	Internationale Waffen Ausstellung (International Firearms Exhibition)
NaBIS:	National Ballistics Intelligence Service
NGO:	National Gamekeepers' Organisation
NPCC:	National Police Chiefs' Council
NRA:	National Rifle Association
NSRA:	National Smallbore Rifle Association
PoA:	United Nations Programme of Action on Small Arms and Light Weapons
RFD:	Registered Firearms Dealer
SACS:	Scottish Association for Country Sports
SEAC:	European Committee for Socio-economic Analysis
WFSA:	World Forum on Shooting Activities
VAA:	Vintage Arms Association
VoS:	Value of Shooting Survey

ANNUAL REPORT 2022

Overview of the year

The year saw a welcome return to normality after two years which had been blighted by the Covid-19 pandemic and the restrictions which it imposed not just upon shooting sports but on every aspect of national life. Member associations were able to fully return to meeting in person, and there was a welcome return of the BSSC Annual Luncheon. The shadow of Covid remained, however, insofar as the firearms licensing backlogs which had been built up during the pandemic, when firearms licensing staffing was reduced, were now extended by applications from a host of aspiring shooters who wished to enter the sport. This, plus the bedding-in of the new Statutory Guidance for firearms licensing, meant that some police forces were severely stretched. Lead ammunition continued to occupy much time throughout the summer and autumn, during which BSSC worked up its response to the consultation on a restriction dossier launched by the Health and Safety Executive. In the international sphere, it was a good year for the UK, with the election of the BSSC Secretary as President of the World Forum on Shooting Activities, and his representation of WFSA at the United Nations in New York.

Animal Sentience Bill

A Bill to make provision for an Animal Sentience Committee with functions relating to the effect of government policy on the welfare of animals as sentient beings, was introduced into the House of Lords with DEFRA sponsorship. It was evident that the legislation as drafted could potentially be used by opponents of game shooting to restrict the sport. The Chairman and Sir Geoffrey Clifton-Brown, Chair of the All-Party Group for Shooting and Conservation, therefore promoted the addition of wording drawn from EU legislation which required the Animal Sentience Committee to take note of regional and cultural traditions. The additional text was accepted, and the Bill passed all its Parliamentary stages and received Royal Assent.

Annual Luncheon

BSSC held its Annual Luncheon following the AGM on March 24 at its traditional venue, the Army & Navy Club, Pall Mall. This was the first such event to have been held since the pandemic and it was much appreciated by the 45 Council members and guests who attended, including Sir Bill Wiggin MP and Sir Graham Brady MP.

Approved Clubs Police Liaison Officers

Contact between police and Home Office approved clubs having fallen away in some forces during the pandemic, the Home Office decided that a review of arrangements was needed and convened a working group to discuss this and related matters. A BSSC team was agreed comprising NRA, NSRA and the Secretary, with input from other associations, and a meeting of the working group was held at the Home Office on June 17. There was a discussion over how often meetings between clubs and police licensing departments should be held, and it was suggested that there was a need for some 'Best Practice' framework. The Metropolitan

Police Service best practice guide was held out as a means of bringing consistency into the process of police liaison, and it was felt that if this could be adopted nationally, then a satisfactory outcome could be achieved. A Home Office 'Task and Finish' group having been formed, BSSC agreed to discuss the matter with the governing bodies of target shooting and offer its proposals for a formalisation of the role of the police liaison officer. Following a meeting between the Secretary, NRA and NSRA, the Home Office was sent a note of what the shooting associations felt the role of a Police Liaison Officer should be. This was discussed at a further meeting with police and Home Office officials and a paper on the Role and Responsibilities of Gun Club Liaison Officers was prepared by the Home Office, for further consideration.

Bisley

The Home Office Head of Firearms Policy, Nick Hunt, approached the Secretary about the possibility of a briefing event for Home Office firearms policy team members at Bisley. This was discussed with the NRA and a comprehensive briefing day was arranged on May 25 for Nick Hunt and his Home Office team comprising Sheila Alexander, Graham Widdecombe, Mike Box and Maureen Young. There was a morning session which explained the range of firearms used for target shooting, and in the afternoon, following a buffet lunch, there was the opportunity to use gallery rifle, .22 semi auto, muzzle loading pistol and shotgun, which everyone enjoyed. There was also a demonstration of the difference between moderated and unmoderated rifles. Thanks were conveyed to Andrew Mercer and his team at Bisley for setting the day up, and all those who assisted with the presentations.

BSSC meetings

A decision having been made to alternate Council meetings between a remote and an 'in person' format, Council meetings were held on February 17 by videoconferencing and on March 24 in person at the Farmers Club. Discussions included lead ammunition, the roll-out of medical markers, establishing BSSC policy with respect to the newly constituted Home Office Firearms Fees working Group and action by Luke Pollard MP around the six-month anniversary of the Plymouth shootings. The March date also saw the Council's Annual General Meeting at which all existing officers were re-elected.

A meeting of Council was held on May 5 at the Farmers Club, in which there was discussion following the first meeting of the Firearms Fees Working Group and planning for the upcoming Home Office visit to Bisley.

The meeting of Council held on July 14 by videoconferencing was also joined in part by Chief Inspector Adrian Davis of Warwickshire Police, staff officer to the NPCC Firearms Licensing lead. There was discussion on a wide range of current licensing issues, including delays, acceptance of paper submissions, the GP medical form and FLD staff training. The meeting on September 8 at the Farmers Club considered lead ammunition and the Home Office review of the Statutory Guidance to Chief Officers of Police on firearms licensing. A letter of condolence was subsequently prepared and sent by the Chairman to HM The King following the death of Her late Majesty Queen Elizabeth II.

Meetings of Council were held on October 13 by videoconferencing, in which the format and

timing of the BSSC response to the HSE consultation on lead ammunition was agreed, and on December 1 at the Farmers Club, when developments arising out of the recent Practitioners Group meeting, including the deregulation of sound moderators, were discussed. A letter of appreciation was received from HM The King following the message of condolence sent to him by the BSSC Chairman.

Criminal Use of Firearms Prevent Board

A meeting of the National Crime Agency's Prevent grouping was held on January 25. There was an update of the criminal use of firearms threat response in which it was noted that most types of firearms crime had returned to pre-pandemic levels. There were discussions on Sentencing Council guidelines, the theft of lawfully held shotguns and project SERGEANCY which seeks to address the threat posed by criminal modification of top-venting blank firers.

A further meeting of the National Crime Agency's Prevent Board was held on April 26, when it was noted that firearms offences had decreased over the previous year and were at their lowest since March 2016. The welcome downward trend still persisted. There was a discussion on a forthcoming national firearms surrender scheme scheduled for May 12-29, and there was a report on the Ukraine conflict and its implication for the illegal transfer of firearms to organised crime groups. At the meeting on July 20 the picture concerning firearms offences had not changed significantly, with urban street gangs primarily responsible for firearm discharges. Monthly firearm recoveries remained stable. There was a discussion about the security of the paper firearm certificate and the potential for forgery, and there was a discussion about the illicit trade in firearms in post-conflict states. On October 19 the meeting discussed novel firearms systems including 3D printed firearms and parts, and considered a 'deep dive' assessment of shotgun thefts to explore the circumstances in which particular thefts had been carried out.

Deactivation

A paper was presented to Council by DWA calling for an amendment of the 1988 Firearms (Amendment) Act, S8A, to exclude from the definition of a 'defectively deactivated firearm' not only those deactivated to an EU specification, but also those deactivated to an official UK standard from 1988 to 2016. Following support for the proposal at the Practitioners Group, the Chairman took the paper to the Minister who responded favourably but cautiously, noting the current passage of the EU Law (Revocation and Reform) Bill which included sunset clauses on many aspects of retained EU law.

Explosives Regulations

It was noticed by VAA that there was an inconsistency in Explosives Certificate application form ER4b, which states that 'Powder must be in containers with no more than 550 grams per container,' the current Guidance meanwhile clearly stating that powder must be in containers of no more than 1 kg. The inconsistency was highlighted and reported by the Secretary to the Home Office. It was discussed with Police FELWG representatives, who raised the anomaly with HSE, the body responsible for explosives regulation.

Fees Working Group

Firearms Fees having remained unchanged since 2015, the Home Office announced that a new Fees Working Group was to be set up in order to review the schedule of statutory fees paid to the police for the grant and renewal of firearm and shotgun certificates, RFD registrations and associated documents. The Secretary was invited to represent BSSC on the Working Group, and contact was made with non-BSSC shooting associations (NGO and SACS) to ensure proper liaison with them. The first meeting of the Working Group was held on April 7 at the Home Office. On July 25, the Home Office updated BSSC on the progress of its Fees review, explaining changes to the collection of data about the processing of certificate grant and renewal by a range of forces. It also agreed to clarify with HM Treasury which activities fall within 'compliance and monitoring' and which fall within 'enforcement' so that licencing costs could be properly apportioned. A fees meeting was scheduled for September 19, but cancelled owing to the funeral of Her late Majesty Queen Elizabeth II. Thereafter the review proceeded slowly and an anticipated meeting of the Working Group was cancelled after the data collection exercise had thrown up problems and significant inconsistencies. It was decided by the Home Office to go back to forces to collect a new set of data by means of a proforma to be completed in early 2023.

FACE

FACE UK

At a meeting of FACE UK on February 2, the FACE Chairman, Torbjorn Larsson, spoke about the strong team they had in Brussels. He said that the diversity of Europe's hunters is a great strength and spoke of FACE's plans to update its mission over the next 5 years. The future of hunting in protected areas was particularly worrying across Europe, and everyone was watching the trophy hunting debate, which could snowball internationally. FACE had analysed the main factors in the outside world which affected hunting and was using this information to inform its upcoming work programme. Secretary General David Scallan spoke of the need to check hunting's social acceptance and establish what is good and what is bad. It was necessary to maintain societal support, and to get EU institutions to understand that hunting is part of the solution to habitat and biodiversity issues. Disease issues were becoming increasingly problematical. African Swine Fever, now present in 10 European countries, was a growing threat to wild boar. Government action plans would call for major reductions in wild boar numbers where ASF is present. Avian Influenza threatened the import of eggs into the UK from French game farms.

FACE Ammunition Working Group

As a member of the FACE AWG, the Secretary assisted with the production of data on lead ammunition usage in the UK. This was of assistance in the preparation by FACE of a robust response to the consultation on proposed restrictions on the use of lead by the ECHA Committee for Socio-Economic Analysis, SEAC. The response was circulated to BSSC members along with responses by EU gun trade associations AFEMS and IEACS.

FACE Firearms Working Group

The Secretary attended a meeting of the FACE FWG on November 21. The European Commission was revising Regulation 258/2012, which lays down rules governing export

authorisation and import and transit measures for firearms, their parts and essential components and ammunition, for the purpose of implementing Article 10 of the United Nations Protocol against the Illicit Manufacturing of and Trafficking in Firearms. The Regulation was amended in 2017 following the terrorist attack on the Bataclan in Paris, but the new revision was being driven by technical requirements of the UN treaty. There were a number of key elements, including requirements for transit authorisations, a simplified procedure for the EU Firearms Pass and a simplified procedure for temporary export. A single position on the draft revision was developed by ESSF, IEACS and FACE, representing sport shooting, industry and hunting. A new chapter was included on imports, with rules about deactivated firearms, definitions of semi-finished firearms and components, signal and alarm weapons, museums and collectors. Positive improvements were a new EU electronic licensing system, a requirement that transit cannot be subject to payment of taxes or tariffs and a general authorisation for operators who meet certain criteria.

Firearms Safety

On July 15 the Government published its response to the consultation on Firearms Safety, a wide-ranging consultation which affected all sections of the shooting community and especially target shooters. On high muzzle energy rifles the Government confirmed that it would be mandating level 3 security for HME rifles through a change to the Firearms Rules. On air weapons, the Government announced that it would not be removing the exemption allowing 14-17 year olds to shoot on private premises with consent. Instead it would be clarifying the 'reasonable precautions' required for air weapon storage, and working with industry to improve safety and security. On miniature rifle ranges, it was announced that range operators would in future be required to hold an FAC. On ammunition and reloading, the Government proposed to make it an offence to possess component parts with intent to assemble unauthorised quantities of ammunition. BSSC responded on this last point by suggesting that an offence "to possess component parts with intent to assemble unauthorised ammunition" would be sufficient to catch the criminal manufacturer whilst protecting the legitimate home loader. This argument was subsequently accepted by Home Office Minister Tom Pursglove in a letter to the Chairman on July 27. The outcome of this long and complex consultation was overall, therefore, a very acceptable one to the shooting community.

Following publication of the Government's response to the consultation on Firearms Safety, the Home Office drafted a Statutory Instrument which would give effect to the decision to impose 'level 3' security requirements on HME rifles. The draft was shared by Home Office officials with the Secretary who, in consultation with FCSA, proposed changes, in particular a transition period which would allow certificate holders time to upgrade their security, as well as time for FEOs to visit holders of HME rifles. Although the Home Office initially resisted a transition period of more than 21 days, the final SI, which was laid early in 2023, contained a transition period of 6 months as requested by BSSC.

Guidance to the Police

Statutory Guidance

On August 25 the Home Office announced a review of the new Statutory Guidance to Chief Officers of Police, which was introduced in November 2021. BSSC responded to the review, expressing concerns over the clarity of the medical information proforma. It was also suggested that a stronger message needed to be sent to GPs about the fact that no liability would attach to them in respect of information provided about applicants. It was suggested that the requirement for a 'practice stamp' on medical checks was an anachronism. Meanwhile BSSC advised better guidance in situations following the seizure and surrender of firearms and a firm requirement for forces to issue a letter where the validity of certificates had been extended under S28B.

Non-Statutory Guidance

A revised edition of the non-statutory Guide to Chief Officers of Police was issued by the Home Office and circulated to BSSC Council members. Updated guidance included new advice on UK Athletics licenced race starters. Guidance on the exemption under section 11(6) relating to organised clay pigeon shoots was re-inserted as requested by BSSC member associations, and new guidance on 'remote' sales by registered firearms dealers was inserted following discussions at BSSC Practitioners Group meetings between police, APSI and GTA.

Home Office Minister

As part of a Government reshuffle, Chris Philp MP was appointed in October as Minister for Policing, with responsibility for firearms licensing matters. Among his first actions was to give evidence to the Scottish Affairs Committee on firearms licensing. The Chairman and Sir Geoffrey Clifton-Brown MP held informal discussions with him.

Lead in ammunition

Lead Ammunition (Restriction) Bill

A Bill was introduced to the House of Lords in January by Lord Browne of Ladyton to restrict the possession, use and sale of lead ammunition. While the Bill had no chance of becoming law, it was seen as a further indication of the views of Parliamentarians on the matter of lead ammunition.

UK REACH

In advance of the anticipated publication by DEFRA of a consultation paper on a possible restriction of lead ammunition, BSSC reviewed its policy in relation to the subject. It was acknowledged that the quarry shooting associations continued to pursue a phase-out of lead for live quarry shooting, albeit that there were increasing concerns over the future availability of both loaded rounds and components. It was further confirmed that BSSC saw no reason for restriction of lead in target shooting disciplines where fired projectiles did not leave the shooting ground or range and where they could be recycled or sequestered. After an initial delay, an Annex XV Restriction Dossier concerning the use of lead ammunition in Great Britain was published by the HSE. The consultation document envisaged a ban on the

sale and use of lead shot for hunting and target shooting with an 18 month transition period and an optional derogation for elite clay shooters at licenced grounds where 90% or greater lead recovery was achieved. It envisaged a ban on the use of all lead bullets with an 18 month transition for large calibre (5.6mm or greater) and a 5 year transition for small calibre (smaller than 5.6mm) bullets and an optional derogation permitting use at licenced ranges where 90% or greater lead recovery was achieved via bullet traps.

BSSC Council agreed the formation of a Working Group to progress the shooting sports and gun trade response, so that all BSSC associations could align their positions as much as possible. Two meetings of the Working Group were held at the offices of the CPSA at Bisley on August 2 and September 30. The questions posed by HSE were reviewed in detail and all associations agreed to assemble data on ammunition usage in their particular sphere of shooting sports and general principles were established with regard to the response by shooting sports. While the transition to non-lead by live quarry shooting was acknowledged, target shooting regarded its use of lead as contained and recyclable and thus felt no need for a move to non-lead ammunition. It was stressed that realistic transition periods were required for any movement away from lead and there was recognition that sub 6.5mm rifles (including all rimfire) were unable at the present time to switch to non-lead. The position of muzzle loading and historic breechloading arms was established, and there was discussion about management of lead at rifle ranges and clay grounds.

The Secretary met HSE and Environment Agency staff to voice concerns and develop proposals, and a detailed response was prepared and approved by BSSC Council. On hunting with shotguns, BSSC supported the principle of a transition to non-lead ammunition for live quarry shotgun shooting in shot sizes and loads which are normally used by live quarry shooters, but at a timescale which could be delivered by the gun and ammunition trade without unnecessary disruption to the sport of game shooting. In the case of large calibre centrefire (6.5mm and greater) rifles used for hunting, BSSC accepted a restriction on the sale or purchase of lead-based expanding ammunition after the conclusion of a suitable transition period. It was proposed that any transition for smaller calibres remained open to review until there was certainty that a range of suitable ammunition which was fit for purpose was available. BSSC did not believe that a restriction on the use of rimfire ammunition for target shooting was proportionate or necessary. Likewise BSSC did not believe that a restriction on the use of airgun ammunition for either hunting or target shooting was proportionate or necessary. On clay shooting, BSSC argued that lead ammunition fired on formally registered and approved clay target grounds did not represent a significant risk to bird life, the environment or human health, and that any restriction of it was disproportionate. Likewise with fullbore target shooting, BSSC argued that Firearm Certificate holders whose rifles were conditioned for target shooting should continue to be permitted to purchase, possess and use lead-based ammunition. Also on shooting grounds, vintage shotguns, along with certain specialist and rare historic firearms such as Paradox type rifled and rifled choke shotguns and muzzle loading guns, should continue to be permitted to be used with lead ammunition. For Practical shooting disciplines it was proposed that a Firearm Certificate holder with a shotgun conditioned by the police for participation in practical shooting should be authorised to acquire and possess lead ammunition. BSSC also felt that the transition periods proposed both for shotgun and rifle ammunition used in live quarry shooting were disproportionately short and would not allow the gun and ammunition trade time to develop, manufacture, supply and distribute sufficient stocks of suitable cartridges to enable live quarry shooting to continue without very significant disruption.

Lead as a Substance of Very High Concern

There were continued moves by ECHA to classify lead as a ‘Substance of Very High Concern’ within the EU. Classification would prohibit the general placing on the market of metallic lead, and every company that wished to use the metal would require an authorisation. To obtain such authorisation, ECHA would need to determine that the use was essential, and the company would then have to pay for a licence. ECHA would report back in 2023 and a decision would be taken in 2024 with a transition period of not less than 3 years.

Licensing delays

The temporary halt on new grants during the Covid pandemic were in large measure responsible for the very serious backlog of firearms licensing work which affected most forces in Great Britain. The problem became so serious that it significantly affected both certificate holders and the gun trade. At the Council meeting on July 14, Adrian Davis of Warwickshire Police and NPCC was invited to comment on delays and other issues affecting firearms licensing. Council members expressed a general concern over delays, where in some cases, 8 week renewal extensions were running out. Unnecessary costs were incurred in storage and staff were being laid off in the gun trade. Other issues raised were a reluctance of some forces to deal with paper applications, poor communications between licensing departments and certificate holders and inadequate staff training. All these matters and others were taken away for consideration by NPCC FELWG.

Medical Marker

BSSC was advised by the Home Office of the commencement of the rollout of the digital marker to English medical practices. The new digital marker was designed to assist GPs with providing information about relevant medical conditions and advise police forces accordingly as part of the licensing process. The digital firearms marker on a person’s medical record was also expected to help GPs to alert police forces to a change in a person’s medical circumstances if there were any relevant medical conditions for the purposes of firearms licensing. BSSC strongly supported the rollout of the digital marker as a step towards the implementation of a 10 year certificate. Initially the rollout was blighted by IT problems and was withdrawn in England after two weeks whilst the Welsh Government decided not to proceed with it. The matter remained pending, subject to the development of a suitable IT fix.

Online renewals

As the new Statutory Guidance started to bed-in and licensing departments started to return to normal levels of working after the pandemic, issues relating to certificate grant and renewal started to become more apparent. Included in these were glitches in the procedure for online applications, especially those related to the lack of a ‘save and return’ facility. Some applicants were also experiencing refusal by their doctor to co-operate and consequent delays while they sought alternative medical support with their application. These concerns and others were raised with both the police and the Home Office.

Plymouth

At the six month anniversary of the tragic shootings in the Keyham area of Plymouth, Luke Pollard MP, the constituency member for the area concerned, held a 'round table' meeting on February 22 to discuss various aspects of the outrage. Present were a range of individuals associated with gun control and the addressing of hate crime, including the Gun Control Network and Devon & Cornwall Police. Shooting interests were represented by the BSSC Secretary, and attendees from BASC and CA. Luke Pollard confirmed that he would be meeting the Home Secretary on March 2 to discuss gun laws, mental health and the 'incel' culture. There was a discussion on pump action shotguns and the question of whether they should be held in homes. It was explained that the type of shotgun was not relevant in the context of an incident extending over 12 minutes, when an ordinary double barrelled gun could have been reloaded several times. At this, even Mick North (GCN) commented that it is the licensing process that is the problem, not the gun. In a discussion about the new medical checks, the Secretary reiterated BSSC concerns about the weak-point in the system posed by the fact that a GP was merely invited to place the marker on a 'best endeavours' basis, not obliged to do so by law.

Ten Minute Rule Bill

Subsequent to his meeting with the Home Secretary, Luke Pollard MP introduced a Ten Minute Rule Bill on firearms and hate crime, proposing a prohibition on the keeping of pump action firearms in homes, making provision about the disclosure of mental health concerns relating to holders of firearms certificates and extending offences of stirring up hatred to cover hatred on the basis of sex or gender. Details of the Bill were circulated to BSSC Council, although the Bill itself stood no chance of further progress in Parliament.

Practitioners Group

A meeting of the Practitioners Group was held at the Farmers Club on May 3 and included discussions on the recently issued Statutory Guidance, reports from the Home Office, Police, National Crime Agency and Police Scotland. It was reported that the Firearms Policy Unit was becoming a permanent unit within the Home Office, focussing on licensing. It would have 18 members of staff. It was also reported that the Authorised Professional Practice for Firearms Licensing would be brought up to date and would be published in 2023, and this would show how policing should operate consistently and how it could be brought to account. Improved police training was regarded by all as essential. A meeting of the BSSC Practitioners Group on November 22 welcomed both the Head of the Home Office Firearms Unit Nick Hunt and NPCC FELWG lead, CC Debbie Tedds, this being the first engagement with BSSC by CC Tedds. The Home Office provided updates on the Fees Working Group and both the Statutory and non-Statutory Guidance to Chief Officers. It was noted that the rollout of the encoded medical marker in England had been a partial success: two software firms supplying GP surgeries had launched the rollout in July; one had been successful and one had not, and the work had had to be stopped. The software problems were being worked through and there would be a relaunch in January. The Home Office said that they were working on an upgrade of NFLMS and it was hoped that a new system could be delivered in 2024. CC Debbie Tedds introduced herself to the group and outlined the structure of NPCC. She recognised the need for greater consistency in licencing between forces but felt that the foundations were

not yet in place to deliver the service she wanted to achieve. The APP was out of date and needed refreshing. A new APP would provide a guide or template which HMIC could inspect against. Work was in hand with the College of Policing to deliver this, and a new APP would be coming forward for consultation in January 2023. CC Tedds also said that shooters should know what to expect from their licensing department and that she was therefore also working on force performance data.

Remote Transfers

Following discussion both at the Practitioners Group and in Council about the lack of clarity over correct procedure for the remote transfer of firearms between a private seller and a private buyer, the Secretary held conversations with both APSI and GTA. These resulted in the finalisation of a GTA paper advising its members in the Gun Trade on correct procedure to be employed when undertaking transfers on behalf of private buyers and sellers. This advice note was then forwarded by the Secretary to the Home Office in the expectation that it would form an approved blueprint for correct procedure.

Scottish Affairs Committee

The House of Commons Scottish Affairs Committee announced an enquiry into firearms licensing following a group of shootings which occurred on Skye and in Wester Ross on August 10. Following a call for evidence by the Committee, BSSC prepared a submission which noted that, while the Firearms Act 1968 applied across the whole of Great Britain, there remained wide inconsistency between police forces in implementing the licensing of firearms, though it noted the high efficiency levels of Police Scotland. BSSC supported the rollout of mandatory medical checks on applicants and called for a statutory duty on GPs to place the firearms marker on patient notes. It commended the mental health initiative by Police Scotland and the Scottish shooting associations and called for it to be extended across the whole of Great Britain.

Scottish Practitioners Group

The Secretary attended the first 'in-person' meeting of the Scottish Practitioners Group in Edinburgh since the Covid pandemic. There was discussion about the new Mental Health leaflet that had been produced by the group and which was now being distributed. Police Scotland reported on firearms licensing statistics. Certificates were renewed on average 9 days prior to expiry, with 99.3% of certificates being renewed before they expired. There was an 'avalanche' of new grant applications for Air Weapon Certificates. There were significant numbers of variations from .243 Win to 6.5 Creedmoor in response to the widespread move to copper ammunition for deer stalking.

Sound Moderators

The Secretary prepared a paper proposing deregulation of sound moderators which was presented to the BSSC Practitioners Group in November. The paper described the technical

aspects of sound moderators and the rationale for their use to protect the hearing of shooters and to reduce noise disturbance in the countryside. It dismissed suspicion engendered by misrepresentation of moderators in films and on TV, it noted the anomalies which existed in the legislation surrounding the use of moderators on sub-12 ft lb air rifles, the fact that they are not required to bear identification marks, that they have not been recorded as contributing to criminality and that they present no threat to public safety. At the Practitioners Group meeting there was full support for deregulation from the police representatives, and the Chairman subsequently approached the Minister on the matter. On December 13, the Minister wrote to the Chairman with the welcome news that “on the assumption that removing sound moderators from certificate control would be supported by both the police and the shooting community, we are minded to do so when a suitable legislative opportunity arises.”

Stakeholder meetings

BSSC attended stakeholder meetings with the Thames Valley, Hampshire and Metropolitan forces. Subjects under discussion included the bedding in of the new Statutory Guidance and new College of Policing training standards. Concern was expressed where significant backlogs which had built up during the Covid period had thus far failed to be fully addressed. Renewals were, by and large, being catered for but in some cases new grants, for which there was a significant increase in demand, had been paused. Online applications now predominated, with in some cases 90% of applications being submitted online and only 10% on paper. Whilst supporting the move to online, with its attendant efficiency savings, BSSC sought to ensure that for those without the technology to apply online, paper applications continued to be accepted.

Trophy hunting

The Hunting Trophies (Import Prohibition) Bill was introduced by Henry Smith MP as a Private Members Bill. It was subsequently accepted by the Government at Second Reading as constituting the fulfilment of a Conservative manifesto commitment. There was very significant support, including on the Government benches. Speaking in the debate, Sir Bill Wiggin expressed the view that the Bill as drafted was not, in fact, just dealing with “rare and endangered” species and as such went beyond the manifesto commitment. The Bill was read a second time and proceeded to its next House of Commons stages.

United Nations

In his newly-elected capacity as President of WFSA, the Secretary attended the 8th Biennial Meeting of States (BMS8) of the Programme of Action on Small Arms and Light Weapons in New York between June 26 and July 1. On the third day of the meeting, non-Government organisations had the opportunity to make interventions and the Secretary did so on behalf of WFSA, commenting on the need to maintain the consensual approach to the Treaty and noting the lack of agreement on some of the PoA’s existing aspirations. He argued for recognition of the lawful civilian use of firearms for the purposes of hunting, sport shooting, collecting and other legitimate purposes and spoke about the shooting associations’ close

working relationships with Government and law enforcement. He offered technical support to the PoA's technical working groups. The final agreed text of the meeting signaled two significant successes. A paragraph which would have brought ammunition into the ambit of the PoA, and thus into the International Tracing Instrument, was not agreed to, indicating no consensus for the future serial marking of ammunition; and it was agreed that a technical working group on modular arms, polymer arms and 3D printing would invite expert participation from industry.

Value of Shooting survey

The Value of Shooting steering group spent much time refining and approving the draft questionnaire which was to be used to obtain data for analysis in the forthcoming socioeconomic survey into shooting sports. Following the move to a new contractor, Cognisense, and the inevitable delays which this occasioned, the Secretary attended a steering group meeting on July 18 following which there was then a formal launch of the VoS questionnaire to the shooting public at the Game Fair. BSSC member associations subsequently launched tailored versions of the survey to their own members. The survey closed on September 30.

World Forum on Shooting Activities

The World Forum returned to its traditional practice of holding its Executive Committee and Plenary meetings in the margins of the IWA trade show which once again took place in Nuremburg for the first time in two years. In the biennial election of the Forum's President, the BSSC Secretary, Graham Downing, was nominated to succeed the outgoing Swedish President Torb Linskog. There was unanimous support for this proposal and Graham was elected to serve for two years. The following day at the WFSA Plenary meeting, another British shooter, the deer stalker, restaurateur and TV Chef Mike Robinson, a passionate advocate of game and wild venison, was presented by the new WFSA President with the annual Vito Genco Shooting Ambassador award. It was a good two days for the UK contingent and for British shooting. Under discussion at the WFSA Executive Committee were the UN Arms Trade Treaty and the Programme of Action on Small Arms and Light Weapons (PoA). It was agreed that a side event would be held at the forthcoming PoA meeting in New York in June on the marking of ammunition, and a small steering group was tasked with making arrangements for this. In the immediate shadow of the Russian invasion of Ukraine, the WFSA Executive approved a resolution in support of the International Olympic Committee, calling on shooting associations to ban participation by Russian and Belarusian athletes at international competitions. There were also discussions about the potential impact that restriction on lead projectiles might have on the ability of ammunition manufacturers to supply conventional ammunition for the defence of Europe.

Annual Autumn Conference

The Secretary attended the annual autumn conference of WFSA which was held in Ottawa, Canada, on September 20-21. There was a review of WFSA activity at the UN Programme of Action meeting in New York, which established an Open Ended Technical Expert Group to consider modular arms, polymer arms, 3D printing and possibly the role of biometrics,

but with industry representatives involved. There was also consideration of the UN working group on ammunition held in Geneva from August 15-19. The involvement of industry was acknowledged and recognised. WFSA discussed international trade issues covering air, sea and land freight providers refusing to transport firearms, ammunition or other goods and refusal of banks and financial institutions to support firearms related clients. It agreed to set up a survey to examine the extent of these restrictions upon international trade in firearms and hopefully to develop proposals to remedy obstacles and constraints. It was agreed that the WFSA autumn 2023 conference would be held in London.

Webinar on the marking of ammunition

It having been a long-held ambition of the United Nations Programme of Action on Small Arms and Light Weapons to introduce serial marking of individual rounds of ammunition, WFSA decided to hold a side event in the margins of the PoA meeting to highlight the disadvantages and technical obstacles. It was agreed that this event would be held online, and in his capacity as WFSA President, the Secretary attended a series of online planning meetings to progress this event, which was held on June 23. BASC's Head of Firearms Martin Parker, formerly of NaBIS, considered the tracing of ammunition used by criminals in the UK and concluded that better recording and sharing of forensic data would be a more proportionate response than marking.

Research papers

In his capacity as President of WFSA, the Secretary attended meetings with the scientific research organisation Arcadis in order to progress review papers on aspects of the impact of lead ammunition on bird populations and on human health. The first of these papers, an appraisal of bird mortality by Dr Carolyn Meyer, was published in the online journal Plos One. It questioned the methodology used to generate statistics on bird deaths allegedly caused by ingestion of lead from ammunition.

Wild Game Guide

The Food Standards Agency published a revision of the Wild Game Guide with minor changes which clarified the legal status of wild game guidance to reflect retained EU law and which incorporated practical changes to the layout to improve readability.

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

© 2023 BSSC

Printed by Micropress Printers Ltd, IP18 6SZ