

**The British Shooting Sports Council** 



# **ANNUAL REPORT 2024**

## **BRITISH SHOOTING SPORTS COUNCIL**

## **ANNUAL REPORT**

## 2024

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## Chairman's Foreword

The year 2024 represented a period of considerable achievement overshadowed by unexpected political turbulence for both the British Shooting Sports Council and the broader shooting community. The Council's efforts throughout the year's opening months centred on progressing critical long-term policy goals, with substantial headway achieved across multiple fronts.

Sound moderator deregulation reached a significant milestone with the Home Office's February consultation proposing their removal from licensing requirements, while firearms fee negotiations had progressed through substantive discussions between BSSC, Home Office representatives, and police officials, establishing frameworks for fee restructuring tied to performance standards and 10-year certificate implementation.

These ambitious plans and years of collaborative groundwork across party lines, however, came to an unexpected standstill when the Prime Minister's announcement of a July 4 General Election suspended all legislative progress, with Parliament's dissolution at May's conclusion bringing all such initiatives to an immediate halt.

Labour's electoral success under Sir Keir Starmer MP resulted in Yvette Cooper MP's appointment as Home Secretary and Dame Diana Johnson MP assuming the Policing Ministry. BSSC responded promptly to establish productive relationships with the incoming administration, though advancement on priority issues remained suspended pending ministerial policy reviews.

Despite this political disruption, the Council sustained its comprehensive engagement programme with law enforcement agencies, government departments, and international partners. The Value of Shooting survey's successful launch delivered persuasive evidence of the sector's £3.3 billion annual economic impact, while the Council's international standing continued to grow through ongoing World Forum on Shooting Activities leadership and active European policy engagement.

A landmark achievement emerged through the College of Policing's new Firearms Enquiry Officer training programme, where BSSC assumed a pivotal role. The September pilot training session at Bisley, hosting 27 FEOs from nine constabularies, exemplified the benefits of practical firearms education in enhancing licensing consistency and professional competence.

The year also witnessed a significant leadership transition as Secretary Graham Downing announced his retirement following six years of distinguished service. Through a comprehensive recruitment process, Jeremy Hinde was selected as Secretary designate, assuming responsibilities from January 2025. The Council extends profound gratitude to Graham for his dedicated advocacy and international leadership throughout an exceptionally challenging period for shooting sports.

Jonathon Djanogly

Chairman

## THE COUNCIL'S OFFICERS

PRESIDENT The Lord Robathan PC

VICE-PRESIDENT Martyn Jones

CHAIRMAN Jonathan Djanogly

VICE-CHAIRMEN Martyn Jones, Derek Stimpson

TREASURER Chris Miles

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 Countryside Alliance Roger Seddon 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 Allan Whiffin National Rifle Association **Andrew Mercer** National Smallbore Rifle Association **Graham Burns** Sportsman's Association of Great Britain & Northern Ireland Savvas Toufexis **United Kingdom Practical Shooting Association** Clive Gamlin

Vintage Arms Association Ian Barclay

Co-opted Members David Penn

Honorary Legal Adviser Mark Scoggins

APCC: Association of Police and Crime Commissioners

APP: Authorised Professional Practice

APPG: All-Party Parliamentary Group

ASA: American Suppressor Association

**ATT: Arms Trade Treaty** 

BASC: British Association for Shooting and Conservation

BMA: British Medical Association

**BSSC: British Shooting Sports Council** 

CC: Chief Constable

COP: College of Policing

CPSA: Clay Pigeon Shooting Association

CUF: Criminal Use of Firearms

DCC: Deputy Chief Constable

DCS: Detective Chief Superintendent

DEFRA: Department for Environment, Food and Rural Affairs

D&C: Devon & Cornwall

ECHA: European Chemicals Agency

EFP: European Firearms Pass

ESG: Environmental, Social and Governance

ESSF: European Shooting Sports Forum

EU: European Union

FAC: Firearm Certificate

FACE: European Federation of Associations for Hunting & Conservation

FEO: Firearms Enquiry Officer

FELWG: Firearms and Explosives Licensing Working Group

FOI: Freedom of Information

GB: Great Britain

**GP:** General Practitioner

HAC: House of Commons Home Affairs Committee

HMIC: His Majesty's Inspectorate of Constabulary and Fire & Rescue Services

HSE: Health and Safety Executive

IOC: International Olympic Committee

ISSF: International Shooting Sport Federation

IWA: Internationale Waffen Ausstellung (International Firearms Exhibition)

MPS: Metropolitan Police Service

NCA: National Crime Agency

NFLMS: National Firearms Licensing Management System

NGO: National Gamekeepers' Organisation

NPCC: National Police Chiefs' Council

NRA: National Rifle Association

NSRA: National Smallbore Rifle Association

PCC: Police and Crime Commissioner

PMB: Private Members' Bill

PNC: Police National Computer

PoA: Programme of Action on Small Arms and Light Weapons

REACH: Registration, Evaluation, Authorisation and Restriction of Chemicals

RFD: Registered Firearms Dealer

RUTIC: Project RUTIC (certificates checking system)

SAGBNI: Sporting Arms and Gunnery Business Northern Ireland

SGC: Shotgun Certificate

SI: Statutory Instrument

TVP: Thames Valley Police

**UK: United Kingdom** 

**UN: United Nations** 

VoS: Value of Shooting

WFSA: World Forum on Shooting Activities

## Overview of the Year

## **Administrative**

#### **Council Meetings**

Throughout 2024, the Council continued its established meeting rhythm, alternating between face-to-face sessions at The Farmers Club and virtual conferences. The February 8th videoconference addressed annual account approval alongside discussions regarding firearms fees and sound moderators, while addressing growing concerns about financial institutions' "debanking" practices affecting shooting clubs and related organisations. Persistent issues with firearms licensing department performance remained a significant concern.

The March 21st Annual General Meeting took place at The Farmers Club, followed by a full Council session examining Fees Order progress and reviewing legal guidance on certificate backdating practices along with Metropolitan Police medical check requirements for RFD servants.

The May 9th in-person Farmers Club Council meeting concentrated on sound moderator deregulation progress, proposed connections between revised fees and 10-year certificates, and the draft Value of Shooting publication. The session also reviewed matters from the April 19th Practitioners Group meeting at the Proof House, particularly MPS initiatives concerning medical assessments for RFD servants and referees.

The July 11<sup>th</sup> Council meeting was held by videoconference and focused primarily on General Election outcomes and their implications for BSSC operations. Council members also examined Home Office proposals for bi-annual strategic meetings and their potential impact on Practitioners Group arrangements. The session confirmed continued commitment to College of Policing FEO training programmes and explored possibilities for a 2025 National Shooting Week.

September 12th meeting addressed financial reporting and approved the 2025 budget while discussing Secretary recruitment procedures, HSE lead ammunition restriction announcements, and strategies for land check elimination.

October 10th videoconference approved Jeremy Hinde as Secretary designate, replacing Graham Downing upon his December retirement. Council endorsed a Practitioners Group paper advocating land check termination and received updates on the WFSA autumn conference, September 19th Bisley FEO pilot training, and CC Debbie Tedds' retirement from the NPCC firearms licensing portfolio.

December 5th final session recognised Graham Downing's six-year service record and confirmed his Council co-option. Discussions covered handover arrangements with the incoming Secretary, 2025 Annual Luncheon planning, and firearms licensing manager land check meetings.

#### Annual Luncheon

The March 21st Annual Luncheon at the Army & Navy Club followed the Council's AGM, welcoming 56 members and distinguished guests including Sir Graham Brady MP, Mark Tami MP, Baroness Buscombe and Lord Crathorne. This gathering provided valuable networking opportunities and facilitated important discussions on shooting sports challenges.

#### **Secretary Transition**

As recorded earlier in this report, early in 2024 Secretary Graham Downing announced his intention to retire upon reaching his 70th birthday. BSSC Chairman and Officers initiated a comprehensive recruitment process, with the Secretary updating role documentation and reviewing employment contract proposals.

The recruitment process commenced with the August 28th videoconference, leading to advertisement preparation for shooting media and member associations, along with engagement documentation development. Vice Chairman Derek Stimpson provided oversight for much of this preparatory work.

October 1st candidate interviews at the City University Club resulted in Jeremy Hinde's selection, subject to Council approval, which was confirmed at October's meeting. Subsequently, engagement letters and contracts were finalised, with press releases distributed to shooting media. Arrangements ensured Jeremy Hinde's participation in partner organisation meetings, while a comprehensive handover session facilitated digital record transfers and IT provider coordination for seamless January 2025 transition.

#### Financial Management

Regular financial oversight continued throughout the year. Subscription invoicing was completed, and financial statements were presented at February's Council meeting. Paul Austen Associates prepared Annual Accounts for Council approval and AGM ratification. Banking arrangements were updated with Lloyds, Santander, and Barclays. Year-end financial reconciliation enabled the incoming Secretary to proceed with annual account preparation.

#### Jim McAllister Memorial

The shooting community mourned the loss of Jim McAllister, a dedicated advocate and coopted Council member. Memorial donations were made to two cancer charities in recognition of his significant contributions to both BSSC and the broader shooting sports community.

## Legislative and Home Office

#### **General Election Impact**

Prime Minister Rishi Sunak's May 22nd announcement of a July 4th General Election, requiring Parliament's dissolution by month-end, created significant ramifications for shooting sports policy. This timing contradicted widespread Conservative MP expectations of an early November election, prompted instead by marginal inflation improvements. The abbreviated "wash-up" period provided insufficient time for addressing outstanding shooting sports matters.

The Conservative Party's decisive defeat led to Labour Government formation under Sir Keir Starmer MP's leadership. Critical unfinished business affecting shooting sports included sound moderator deregulation, firearms fee restructuring, firearms safety consultation responses, Wildlife & Countryside Act Schedule 2 reviews, and HSE lead ammunition restriction proposals. Yvette Cooper MP assumed the Home Secretary role while Dame Diana Johnson MP became Policing Minister.

#### Sound Moderator Deregulation

Early 2024 witnessed substantial sound moderator deregulation progress. The Home Office's February 21st consultation proposed removing moderators from licensing through Legislative Reform Act 2006 provisions. Following Chairman consultation, details were distributed to BSSC members and allied organisations to encourage positive consultation responses. BSSC submitted comprehensive support prior to the April 2nd deadline.

Continued rapid advancement saw Home Office indication that Legislative Reform Act 2006 Orders would reach Parliament before July 23rd recess. The legislative process appeared certain until the General Election announcement immediately terminated all progress. This represented considerable frustration following two years of intensive BSSC effort.

Post-election, the Chairman contacted new Policing Minister Dame Diana Johnson MP seeking deregulation assurances. The Minister confirmed Home Office review of all consultation responses from the previous government's 2024 process, with responses to be published subsequently.

#### Firearms Fee Reform

With no new Fees Order consultation developments, the Chairman and Sir Geoffrey Clifton-Brown MP engaged in ministerial discussions. BASC-facilitated negotiations involving the Secretary, Chief Constable Debbie Tedds, and Superintendent Adrian Davis established foundations for fee increases linked to police performance guarantees regarding licensing turnaround times.

April 22nd Home Secretary correspondence, following continued Chairman and Sir Geoffrey Clifton-Brown engagement, indicated forthcoming fee consultation publication would include firm 10-year certificate commitments with implementation dates, contingent on safety assurance. The General Election announcement derailed both fee consultation and any immediate 10-year certificate prospects.

The December 17th Written Ministerial Statement confirmed Government intentions to implement Statutory Instruments increasing firearms licensing fees for full police cost recovery, with additional revenue retained for licensing improvements. The Secretary responded to the Home Office Firearms Policy Head, highlighting "full cost recovery" terminology ambiguity. BSSC emphasised that "full cost" should reflect efficient licensing operations, incorporating land check elimination and sound moderator deregulation. Calls continued for service level agreements, inflation indexing, and 10-year certificates.

## Strategic Meeting Proposals

Home Office proposals emerged for BSSC participation in bi-annual strategic meetings with officials, NPCC, Scottish Government, and other stakeholders. Secretary discussions with the Chairman and Vice Chairman noted potential impacts on successful BSSC-managed Practitioners Group meetings. Subsequent meetings between Home Office officials and BSSC leadership addressed strategic panel proposals and Practitioners Group relationships. Following BSSC personnel change notifications and additional communications, March 2025 inaugural strategic panel meetings were scheduled.

#### **Crossbow Consultation**

March Home Office crossbow licensing regime consultation prompted BSSC responses noting that while crossbows fell outside direct Council concerns, any firearms-mirroring licensing schemes incorporating PNC checks, interviews, and referee systems would logically integrate with existing police firearms licensing operations. Such developments would inevitably increase firearms licensing workloads, significantly impacting shooting sports participants, gun trade operations, and shooting ground services. BSSC therefore advised against pursuing such approaches.

#### Blank Firer Reclassification

October 24th Home Office correspondence advised that National Crime Agency expert reports identified certain Turkish-manufactured top-venting blank firing pistols as "readily convertible" under Firearms Act 1982 S1 provisions and were thereby prohibited. A four-week amnesty was proposed from February 3rd, 2025, across English and Welsh forces would enable voluntary surrender without compensation, given existing legislative breach determinations. All BSSC member associations were kept informed of these reclassifications.

#### 3D Printing Legislation

Preet Kaur Gill MP's Private Members Bill addressed 3D firearm printing and blueprint possession. Recognising limited PMB legislative prospects, the Secretary nonetheless advised the Home Office that 3D printing represents novel manufacturing methodology, currently illegal in Great Britain without Firearms Dealer registration. While preventing criminal firearm production remained essential, BSSC emphasised the continued importance of RFD access to contemporary manufacturing techniques.

#### Firearms Act 2023 Implementation

Home Office guidance iterations for S11(4) miniature rifle range operations under 2023 Act provisions enabled range operations during FAC operator absence, provided there was suitable qualified supervision. Clarification addressed simultaneous range usage by FAC holders using firearms beyond operator certificate coverage. Official agreement and satisfactory Home Office draft circulation preceded a proposed May 1st 2025 commencement notice.

#### **Product Regulation Legislation**

Published legislation ensured UK government flexibility in adopting EU product safety laws and standards while enabling beneficial business and consumer divergence. Given specific firearm proving references, the Secretary engaged both Proof Houses for Proof Master assurance regarding Bill support and absence of adverse effects.

#### NFLMS Replacement

The Secretary confirmed BSSC stakeholder participation interest to Blue Light Commercial Ltd, facilitating NFLMS replacement procurement. Arrangements ensured Secretary designate would remain involved during the 2025 process advancement.

#### Pyrodex Reclassification

A question regarding the licencing requirements to hold Pyrodex (an alternative to Black Powder) had been raised by Police FLDs. Pyrodex was not included in the licencing exemption granted by ER14 for smokeless shooters powder and requires the issue of an Explosives Licence to acquire and keep. This substance was obtainable in the UK without a licence prior to ER14. There had not been a change in the formulation or in the production method and the lack of an exemption creates additional licencing activity. There is also confusion regarding the advice to store smokeless shooters powder and Pyrodex in a compartmented box mandated for the storage of Black Powder. This alternate use of the compartmented box has not been subject to official trial, and the consequences of an ignition event are therefore unknown and needs to be tested. The current position exposes FLDs to potential liability with recommending storing smokeless and Pyrodex shooters powder in untrialled storage conditions. HSE stated they expected pragmatic, proportionate police enforcement relating to safe storage standards.

#### **Police**

## **NPCC Leadership Transition**

September concluded with CC Debbie Tedds' formal retirement announcement from Warwickshire Police, simultaneously vacating the NPCC Firearms Licensing Portfolio. While no immediate successor designation occurred, speculation centred on DCC David Gardner of Warwickshire Police assuming the role.

Subsequent confirmation established DCC David Gardner's appointment to the vacant NPCC firearms licensing portfolio following CC Tedds' departure. Coordinated arrangements facilitated an introductory videoconference on December 6th between DCC Gardner and national shooting association representatives, attended by the BSSC Secretary designate.

#### **Practitioners Group Engagement**

The April 19th Proof House gathering featured Home Office Firearms Policy Head Nick Hunt confirming government implementation of Plymouth shooting Coroner recommendations, particularly enhanced FEO training. Additional consultation matters had generated substantial responses. Hunt provided updates on moderator progress, fee developments, medical marker systems, and S11(4) guidance advancement. NPCC's Adrian Davis addressed police licensing performance data, responding to FOI request criticism regarding publication delays, while outlining College of Policing FEO training course development.

Project Titanium discussions revealed trial questionnaire usage by three licensing teams, aligned with domestic abuse assessment protocols. The BBC coverage highlighted these initiatives as causing serious shooting association concerns over nationally uncoordinated, consultation-free initiatives and lacking Home Office oversight. NPCC confirmed project suspension.

Non-statutory MPS forms requiring RFD servant medical checks prompted BSSC presentation of two legal opinions confirming procedural illegality. Home Office representative Nick Hunt acknowledged these procedures exceeded guidance requirements, lacked BMA consultation, and contradicted data protection principles, and promised NPCC discussions. BSSC's backdated certificate legal opinion demonstrated unlawful procedures. NPCC's Adrian Davis confirmed certificates cannot have sub-five-year durations and agreed to circulate opinions for FELWG consideration. Police Scotland and National Crime Agency provided update reports to the Practitioners group.

October 18th BSSC Practitioners Group session received Home Office updates on fees and sound moderators, both unchanged post-election. New NPCC firearms lead DCC Gardner's intention to attend subsequent meetings was confirmed, alongside his commitment to a pre-Christmas force performance data release. Feedback received from the Bisley FEO pilot event recognised BSSC's significant contribution and cemented continued FEO training

support with the College of Policing. Police Scotland and National Crime Agency reports followed.

The Secretary's land check paper questioned public safety value, advocating cessation and amendments to the guidance. Discussion agreement established further meetings between firearms licensing managers, BSSC, and Home Office. Devon & Cornwall licensing team discussions revealed an over reliance on Chapter 12 Guide tables. Consensus recognised table inadequacy, with Home Office welcoming BSSC revision expertise. MPS medical check decisions for RFD servants received additional discussion.

#### **Cumbria Incident Briefing**

NPCC provided the Secretary with briefing details regarding the tragic September 28th shooting of an eight-year-old boy near Warcop, Cumbria, during rabbit shooting activities. Incident details confirmed all participants held proper licenses with no licensing, suitability, or permission concerns.

This engagement with national shooting associations represented a welcome NPCC procedural development. Council members received appropriate incident notification, with investigations continuing.

#### Criminal Use of Firearms Prevention

January 17th NCA Criminal Use of Firearms Prevent Board meeting updated criminal firearm use threat levels, which remained suppressed. Continued discussions addressed top-venting blank firer availability and convertibility alongside unlawful smuggled component assembly. Strategic Communications Campaign reports on shotgun security from November-December 2023 noted theft declining during campaign periods: 35 shotguns stolen versus 55 during comparable 2021 periods. Warwickshire and West Midlands pilot RFD firearms surrender project updates followed local force coordination.

July 17th online CUF Prevent Board session noted slight criminal discharge and homicide increases but within expected ranges. Seasonal analysis demonstrated longer daylight hours and increased social events during summer months correlating with discharge events, suggesting seasonal rather than systematic increases.

NCA suggested that criminals preferred original lethal purpose weapons, though converted blank firers gained prevalence due to acquisition ease. 3D printed firearms appeared undesirable to criminal users. Previous UK antique firearm criminal usage spikes had declined and showed irregular usage patterns.

October 16th NCA headquarters meeting marked the Secretary's final BSSC representation, introducing Jeremy Hinde as successor. Turkish top-venting blank firers were covered on the agenda as was Project RUTIC that addressed certificate verification improvements preventing fraudulent document usage.

Board Chair Charles Yates extended appreciation for the Secretary's long-term guidance and board membership support, offering retirement well-wishes.

#### Force Performance Monitoring

January 10th's Winchester Hampshire police stakeholder meeting revealed continued serious grant backlogs, with slowly declining but persistently high numbers at 758 outstanding grants. Simple grant turnarounds required 9-10 months, extending further for suitability-issue cases. Monthly renewals processed 60-70 applications with 12-week turnarounds. Variations were normally completed within two weeks. 2023's 12 revocations accompanied Hampshire's acknowledgment of unsatisfactory seizure review processing.

The Secretary also attended the Hampshire Police stakeholders group meeting in Winchester on July 17th, meeting the new licensing lead DCS Tim Rowlandson and new licensing manager Chief Inspector Lou Hubble. Hampshire were struggling to overcome a backlog of more than 800 outstanding grant applications and acknowledged that the waiting time of 10 months for a new grant was unacceptably long. Some 80 new applications were, in addition, being received each month. Renewals were being turned round in 16 weeks and variations in 2-3 weeks. It was accepted that the establishment of 8 FEOs was insufficient, and the licensing department was clearly making genuine efforts to overcome its present difficulties.

The February 5th Thames Valley stakeholder meeting reinforced that TV are a large force managing 28,000 issued FACs and SGCs. In 2023 they granted 1,158 new certificates and renewed 5,769. Their grant turnaround time was currently 45 working days for FAC and 39 for SGC. Renewal turnaround times were 42 days for FAC and 28 for SGC. These times peaked in May 23 when there was a staff shortage, but all metrics were now trending slowly downwards. There were 60 revocations in 2023 and 31 voluntary surrenders. All of these were in cases where the certificate holder was told that if he or she did not surrender their certificate, it would be revoked. Secretary concerns addressed TVP's authoritarian stakeholder engagement approaches reflected in required conduct codes, attendance interview processes, and contribution evaluations.

#### Land Check Reform

At the College of Policing event on July 23rd during the period for questions from the floor, South Yorkshire FEOs had raised the matter of ending land checks. When the floor was asked whether land checks were favoured by forces, there was little or no support for them. Following submissions by member associations, the Secretary prepared a paper that was presented at the next Practitioners Group meeting.

On November 7th an online meeting was held that included the Secretary, Secretary designate, NPCC Firearms Staff Officer, BASC Firearms Head, Dennis Wilmer (Home Office), and firearms licensing managers to discuss land check cessation possibilities. Strong though not universal termination support emerged alongside some firearms licensing

manager preferences for replacements. NPCC's Adrian Davis suggested official website advisory material regarding firearm safety as a suitable replacement. Alternate views expressed were for compulsory pre-certification training and testing.

Adrian Davis summarised the meeting by suggesting that licensing managers agreed that they did not want to be making land checks but that they may not wish to remove them from the guidance completely. Police Scotland model research and Home Office investigation into original land check introduction reasoning would follow.

#### **RFD Medical Requirements**

BSSC identified non-statutory MPS firearms licensing questionnaires sent to servants of RFDs and also to referees for FAC or SGC applicants. Questionnaires stated referee expectations for immediate and five-year ongoing notification of applicant circumstance changes potentially impacting firearm possession suitability. This implied non-existent legal referee responsibility burdens. Council discussion agreement led to Chairman ministerial engagement regarding MPS non-statutory RFD servant medical check procedures.

Council discussions on non-statutory MPS forms requiring RFD servant medical checks prompted Chairman correspondence to then-Policing Minister Chris Philp MP regarding MPS firearms licensing practices contravening Firearms Rules. Government changes prevented reply receipt, leading to Secretary discussions with NPCC firearms staff officer Adrian Davis for matter resolution.

The Secretary arranged online meetings with newly appointed MPS firearms licensing managers regarding RFD servant medical reports, attended by Secretary designate. Secretary observations noted MPS systems requiring RFD servant detail submissions for compulsory medical checks absent from guidance and unique among 43 forces. National standardisation drives made MPS independent processes unhelpful. RFDs felt compelled toward compliance despite BSSC understanding of voluntary procedures. BSSC held meetings with newly appointed MPS licensing manager Pete Court who accepted that although the requirement was non-statutory it had an important role to play in RFD public safety maximisation benefits. He acknowledged that clearer messaging was required and this led to BSSC-assisted clarification letter drafting for MPS area RFD circulation.

#### **FEO Standardisation**

During the last quarter of 2024, the Secretary provided College of Policing with suitable commentary on a proposed FEO form, standardising licensing department approaches for firearm possession suitability determinations.

#### **Scottish Operations**

On August 27th Edinburgh Scottish Practitioners Group meeting at Sport Scotland offices and discussed Police Scotland's new firearms licensing operating model arising from a 2022 internal review. This recommended standardisation of Scottish operations. Six geographical "clusters" would serve approximately 10,000 certificate holders each, with an Inspector in control with two supervisors and 13 FEOs (70% civilian, 30% warranted officers). This would enable several warranted officers to be reassignment to regular policing duties. Internal consultations continued targeting early 2025 for implementation.

There was also discussion about the new mental health leaflet which was approved for England & Wales usage. There was also discussion of "bulge" manipulation for licensing workflow balance and early renewal practices. Concerns emerged regarding 1968 Act five-year certificate specifications and Fees Order fee level breaches. BSSC Secretary noted primary legislation referred to certificate length, whereas fee levels could be changed by SI. It was noted that easier fee level modifications may be possible during the upcoming Fees Order negotiations, which prompted meeting requests for the BSSC to write to the Home Office. Pyrodex reclassification by the HSE raised discussions around explosives certificate issuing consequences.

#### **Certificate Dating Issues**

Police firearms licensing department failures during eight-week statutory extensions followed by backdated certificate issuance to previous document expiry raised illegality concerns. Suggestions emerged that post-extension certificates represented new grants rather than renewals. Council discussions led the Secretary to consultation with Honorary Legal Adviser confirming backdating illegality. Next Practitioners meeting resolution agreements followed.

#### College of Policing

## Training Programme Development

Plymouth tragedy aftermath revealed inadequate firearms enquiry officer training as primary causative factor. A £500,000 Home Office funding commitment enabled the College of Policing to develop a new FEO course including a one-day firearms familiarisation component. Council discussions confirmed BSSC support through qualified instructor and coach provision demonstrating the most common shooting sports firearms with supervised range usage opportunities.

BSSC Secretary engagement with former MPS licensing manager Chris Downs, now with College of Policing, developed firearms familiarisation course aspects. On May 16<sup>th</sup> a meeting held at Bisley involving NRA and BASC preceded formal College syllabus drafting. The Secretary engaged with member associations to source instructor/coach and venue commitments. On June 14<sup>th</sup> a follow-up meeting refined course requirements and BSSC

member association participation. The Secretary held meetings with Chris Downs, Martin Parker (BASC), and Andrew Mercer (NRA) to refine the firearms familiarisation session and to formalise range day arrangements integral to national FEO courses. A BSSC-branded pilot event was held at Bisley on September 19th.

#### Training Launch

July 23rd's College of Policing launch event at Ryton-on-Dunsmore, Warwickshire, welcomed Secretary attendance alongside other Council members for the new FEO training course introduction. FEOs and licensing managers from across England and Wales attended with Home Office officials. Detailed course explanations preceded multiple speakers including Home Office Firearms Policy Head Nick Hunt. The BSSC representation strongly supported FEO training initiatives and anticipated this to improve cross-force consistency.

#### **Bisley Pilot Success**

On September 19<sup>th</sup> the BSSC and CoP pilot training was held at Bisley and welcomed 27 FEOs from Dorset, Thames Valley, Surrey, Sussex, Kent, Hertfordshire, Bedfordshire, Hampshire, and MPS. Nine BSSC member association presenters covered diverse shooting disciplines including target shooting and live quarry activities, supported by four observers. The exceptional success of this event generated highly positive FEO feedback, with the only organiser concern centred on national event replication capabilities.

#### **Lead Ammunition**

#### **UK REACH Process**

On December 10th 2023, the UK REACH consultation closure on lead ammunition analysis prompted a January 2024 stakeholder meeting to advise that 8,000+ responses had been received and this would take time to evaluate. HSE advised response delays accordingly.

On September 3<sup>rd</sup> the Secretary attended an HSE online briefing in advance of a full challenge meeting held on September 5<sup>th</sup>. BSSC and member associations held observer status. This confirmed that restriction proposals remained largely unaltered. Lead shot elimination from live quarry and target shooting markets created complete restrictions with five-year transitions. Clay shooting grounds remediation requirements were not required. British Shooting derogations enabled Olympic elite shooter lead shot usage for international clay shooting competition training. Restrictions would not apply to air rifle ammunition.

Bulleted ammunition maintained small calibre unrestricted usage for target shooting and live quarry while restricting large calibre ammunition. Critical changes reduced large-small calibre breakpoints from 6.5mm to 6.17mm, placing .243Win within large calibre restricted categories. Live quarry lead ammunition prohibition contrasted with target shooting range

permissions maintaining appropriate lead recovery, effectively covering most target ranges.

Large calibre transition periods measured three years for live quarry and two years for target shooting. Collector and museum ammunition placement exemptions applied to unfired ammunition. October-end HSE restriction opinion submissions to Defra, Welsh, and Scottish Governments followed.

#### Final HSE Determination

Following additional delays, the December 13th HSE publication of Great Britain lead ammunition restriction proposals maintained previous iteration consistency. Lead shot market prohibition for live quarry and target shooting created complete restrictions with five-year transitions. Target shooting has some derogation as long as lead recovery systems are in place. There was no derogation for clay shooting grounds but no requirement for remediation work. British Olympic Shooting derogations permitted elite shooter lead shot usage for international clay competition training. Air rifle ammunition remained unrestricted.

Bulleted ammunition preserved small calibre unrestricted target shooting and live quarry usage while restricting large calibre ammunition with 6.17mm breakpoints including .243Win within large calibre categories. Live quarry lead ammunition prohibition contrasted with target shooting range permissions requiring appropriate lead recovery covering most target ranges effectively. Large calibre transition periods spanned three years for live quarry and two years for target shooting. Unfired ammunition collector and museum placement exemptions applied. England, Scotland, and Wales authorities received proposals for final decision assessment.

#### .243 Winchester Concerns

Post-briefing meeting Secretary preparation submitted additional HSE .243Win guidance noting non-lead 80-grain round failures achieving required deer shooting muzzle energy from conventional short-barrelled stalking rifles.

#### Scottish Deer Ammunition

Scottish Government reductions of required deer shooting bullet weights from 100 to 80 grains potentially reduced lighter non-lead bullet muzzle energy generation. The Secretary sought to establish from the Scottish Government if a reduction in required muzzle velocity would then follow. The Scottish Government confirmation maintained existing muzzle energy requirements with user responsibility for ensuring rifle-cartridge combination compliance.

#### **European Developments**

EU lead ammunition restriction legislation continued slow progress largely due to heightened legislator awareness regarding military small arms ammunition supply impacts and western Ukraine conflict interest risks. Middle East conflict renewals further heightened supply chain concerns.

European Shooting Sports Forum statements highlighted serious lead ammunition ban consequences for hunters, sport shooters, firearms dealers, collectors, ammunition manufacturers, and EEA security/defence sectors. Ten-year moratorium proposals, extended transition periods, sport shooting derogations, and rimfire ammunition exemptions followed.

#### International

#### World Forum Leadership

Throughout 2024, the Secretary maintained extensive international engagement in his capacity as WFSA President. January's SHOT Show meetings in Las Vegas centred on discussions around evolving lead ammunition processes. European Secretary briefings addressed EU lead restriction proposal developments, indicating European Commission delays in ECHA lead restriction REACH Committee discussions until post-June 2024 EU Parliament elections.

Anticipated postponements to subsequent legislature prompted European manufacturer concerns over future military supplies, raising stakeholder awareness and European Commission pressure. European Defence Agency approaches received strong support.

February's IWA Nuremberg WFSA meetings addressed ongoing UN legislative developments. Arms Trade Treaty preparatory conferences proposed new firearms manufacturing industry liability standards creating manufacturer responsibilities for subsequent firearm misuse alongside import/export due diligence requirements. Production or distribution chain participants (dealers, storage facilities, intermediaries) would be considered industry components. EU state blocking minorities toward UN developments were hoped, given high-profile defence concerns.

WFSA granted American Suppressor Association full membership. ASA pursues Federal sound moderator approval currently subject to state-by-state licensing and restrictions. ASA addressed restrictive state legislation while expressing UK development interest. WFSA also welcomed ISSF membership, presenting President Luciano Rossi with the Vito Genco Shooting Ambassador Award. Graham Downing (BSSC) received two-year term reelection for additional 12-month WFSA Presidential service.

Stockholm's annual Fall conference hosted the Secretary's attendance as WFSA President. The year marked Arms Trade Treaty adoption's 10th anniversary, with membership including 41% of top international exporters and 32% of importers. ATT was increasingly

viewed as international normative standard. Leadership transitions included new Argentinian Secretariat heads previously with Control Arms, potentially creating more challenging firearms sector environments.

ATT calls for firearms manufacturing sector reparations led to new working group creation addressing corporate responsibility and due diligence for international arms transfers.

#### **US NRA Relations**

WFSA Presidential capacity enabled Secretary participation in three meetings with newly elected US National Rifle Association President Bob Barr, former Republican House Representative, confirming NRA's continued WFSA involvement and support.

Additionally, WFSA Presidential duties included UK NSRA engagement seeking suitable WFSA Plenary meeting speakers for February 2025 Nuremberg events. Team GB Paralympian pistol shooter Issy Bailey's agreement as guest speaker led to formal WFSA Secretariat invitations.

## **United Nations Engagement**

June's UN Programme of Action on Small Arms and Light Weapons review conference witnessed four ammunition inclusion attempts in final drafts. Iran, Egypt, Russia, and US objections prevented inclusion, requiring consensus for final text paragraph withdrawal. Open Ended Technical Expert groups addressed "new and emerging" technologies, particularly 3D printing. Government-only groups would invite industry experts through government invitation.

WFSA expressed concerns regarding "due diligence" principal applications pushed throughout UN levels, gaining Arms Trade Treaty traction. Principles established firearms manufacturer responsibilities for downstream misuse (terrorism, crime diversion) primarily promoted by Latin American states. While reasonable manufacturer product control expectations existed, WFSA argued against comprehensive distribution, transport, storage responsibility for human rights violations following lawful, legitimate product sales.

European delegation support for these positions prior to UN Programme of Action meetings proved welcome. As UK no longer participated in EU delegations, Secretary Home Office correspondence encouraged UK support for EU positions at PoA meetings, receiving favourable responses.

## **European Federation Activities**

On November 6<sup>th</sup>, FACE Ammunition Working Group attendance featured Secretary General David Scallan presentations on wetlands bans and EU lead ammunition prohibition potentials.

FACE involvement in European Shooting Sports Forum position statement development requested sufficient hunter transition periods; sport shooting derogations requiring Member State authority for shooting range lead permissions; 6.5mm rather than .22 centrefire rifle ammunition differentiation; permanent rimfire rifle ammunition exemptions; and 10-year moratorium ensuring European ammunition manufacturing protection during Russia-Ukraine conflict.

European Commission restriction proposal presentations in REACH Committees would commence February 2025 earliest, with environmental NGOs expressing frustration over delays, primarily related to European defence strategy concerns and ammunition production expansion. Dr Scallan confirmed European Court dismissals of Firearms United legal challenges to wetlands lead bans.

Secretary FACE Ammunition Working Group membership facilitated European single projectile target range survey development. Objectives included detailed facility analysis presentations to European Commission preceding potential lead ammunition target shooting restriction exemption considerations. NRA discussions provided UK range lead capture details for survey inclusion. Close EU-GB legislative parallels offered helpful GB target shooting data.

#### **EU Regulatory Framework**

April 23rd saw European Parliament approval of EU firearms import, export, and transit measures Regulation 258 established, which simplified procedures for EU hunters, sport shooters, and historical reenactors traveling outside EU with firearms. More significantly for UK perspectives, single import authorisation introduction provided simplified procedures for hunters, sport shooters, and historical firearms collectors entering EU with firearms and ammunition.

Following Brexit EFP losses, these developments potentially offered useful single import authorisation procedures valid across EU. Documentation similarities to previous EFP travel arrangements included important additions: criminal record absence proof or statements. GB certificate holder verification methods for EU entry or travel with firearms remained unclear.

Regulation 258/2012 revisions governing export authorisation and import/transit measures for firearms, parts, essential components, and ammunition approved "due diligence" exemptions. Downstream distribution, transport, and storage exemptions for weapons, munitions, and war materials confirmed civilian firearm applications.

Revised Regulations provided general import authorities enabling hunter/sport shooter/collector EU entry, potentially offering EFP benefits through unrestricted EU travel. However, applicants required "criminal record absence certificates from origin countries".

#### Trade Restriction Challenges

WFSA Trade Restriction survey approval addressed significant pressures from perceived discriminatory practices by financial, transportation, insurance, storage, and social media sector suppliers. Multiple complex factors emerged within identified supply sectors. Common supplier themes included reputational and financial risk fears driving business relationship severances with firearms communities.

Government pressures affected all sectors. Jurisdiction-varying complex regulations challenged suppliers, with compliance errors resulting in significant fines and reputational harm. Complex, contradictory regulation challenges were compounded by uninformed, uneducated supplier personnel regarding proper compliance. Elected officials took direct action through veiled threats against firearms-related supply chain participation.

WFSA approved two working group establishments addressing survey-highlighted issues and identifying overcoming methods. Transportation-focused groups and financial/insurance related groups sought national association involvement. Survey and working group details were circulated to BSSC members.

WFSA survey progression examining perceived discriminatory practice causes by financial, transportation, insurance, storage, and social media sector suppliers led to working group formation addressing a) transportation and storage and b) banking and insurance. Working groups reported back to September WFSA Executive meetings. Working group Chair invitations for broader national shooting organisation participation forwarded subgroup details to BSSC member associations enabling participation.

WFSA discussions of transportation subgroup reports concerning systemic firearms user and trade discrimination proposed programme development reducing import/export regulatory challenges across key countries by countering Environmental, Social, and Governance (ESG) discrimination negative impacts. Furthermore, external resource engagement agreements for limited periods would research, catalogue, assess, and develop achievement plans.

#### **Trade Show Participation**

WFSA Presidential capacity enabled BSSC Secretary WFSA interview recordings at Nuremberg IWA shows. Secretary liaison with IWA management and WFSA Secretariat secured video and PR package uploads to IWA and WFSA websites.

## Value of Shooting

The comprehensive Value of Shooting survey reached completion during 2024, delivering compelling evidence of shooting sports' economic, social, and conservation significance throughout the United Kingdom. Key findings established shooting's £3.3 billion annual UK economic worth, generating additional £9.3 billion broader economic activity.

Research demonstrated 620,000 individuals' active shooting-related activity involvement, with shooting providers and volunteers conducting £500 million conservation work managing 7.6 million hectares. Additionally, 75% of shooting participants confirmed its importance to their physical and mental wellbeing.

BASC publications department produced multiple final brochure drafts, and with Secretary liaison providing additional target shooting imagery to enable broader publication bases. The Game Fair in July plus political initiatives required publication timescale compliance, prompting Council approval requests. Despite association representative reservations about brochures, recognition that non-launch would waste invested funds led to Council publication support.

The July 4th General Election announcement accelerated the survey launch. Member association printed brochure orders were distributed to BSSC principal partners. PDF versions received wide BSSC contact circulation. BASC publicity team press packs were distributed to all BSSC member associations enabling maximum pre-election survey promotion. Council was kept informed of Secretary press coverage.

#### International Recognition

UK Value of Shooting survey publication enabled BSSC Secretary detailed WFSA conference presentations covering economic value, live quarry and target shooting participation, conservation benefits, health, wellbeing, and social cohesion. Results generated significant WFSA member association interest, demonstrating UK leadership in shooting sports value quantification.

Strategic Value of Shooting report promotion preceding General Elections demonstrated UK shooting scale, contribution, and social value. Over £3.3 billion annual economic impacts and 7.6 million hectares under active management provided clear, credible narratives for policymakers and public audiences alike.

#### **Olympics**

BSSC extended enthusiastic congratulations to GB shooting team members achieving outstanding Paris Olympic Games success. Nathan Hales secured men's trap gold medals with new 48 ex 50 Olympic records, surpassing previous records by impressive five-target margins. Amber Rutter claimed women's skeet silver following controversial finals where missed target judgments contradicted video playback evidence of clear target destruction.

GB shooting team achievements provided excellent British shooting sports showcases on world stages, demonstrating UK shooting community marksmanship and competitive excellence characteristics.

These successes emphasised continued elite shooting sports support importance and pathways enabling talented shooter progression from grassroots participation to Olympic competition levels.

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The Council is a founding member of the World Forum on Shooting Activities (WFSA) and an NGO in Roster Consultative Status with the Economic and Social Council of the United Nations

Constituent Associations: APSI, BASC, CPSA, CA, DWA, FCSA, GTA, HBSA, ICSI, MLAGB, NRA, NSRA, SAGBNI, UKPSA, VAA.

**British Shooting Sports Council**