



Submission on Proposals for amendments to the Arms Act 1983- Clubs and Ranges June 2024

Introduction

1. This submission is made by the New Zealand Council of Fish & Game New Zealand, on behalf of all Fish & Game Regions. We support changes to the Arms Act which enhance public safety, and which enable shooting clubs and shooting ranges to operate safely, efficiently and without unnecessary bureaucracy and cost. Fish & Game NZ has held concerns that the current Arms Act legislation regulating clubs and ranges is excessively bureaucratic, difficult, and expensive, and will or is having a perverse effect to what was intended in terms of public safety.
2. The document 'A new approach to regulating shooting clubs and ranges' outlines a range of what is in our view sensible changes which will enhance operation of shooting clubs and ranges, and will enable them to operate more efficiently, while enhancing public safety.
3. Many of our Fish & Game licence holders who hunt game birds also shoot for skill and practice on non-pistol club ranges and are members of those clubs.
4. This submission relates to matters particular to non-pistol clubs and ranges, on points and aspects most relevant to Fish & Game licence holders as in game bird hunters.

Fish & Game organisation

5. Fish & Game is a statutory body established by Parliament under the Conservation Act 1987 to manage, maintain, and enhance sports fish and game birds and their habitats throughout New Zealand in the interests of anglers and hunters. The organisation comprises 12 regional autonomous Fish & Game councils, and the 13th council is the NZ Fish & Game council made up of appointees from each regional council. Fish & Game reports annually to the Minister of Hunting & Fishing.

6. Fish & Game directly represents around 150,000 licence holders. Approximately 40,000 of these are game bird hunting licence holders, i.e., they are recreational game bird hunters. Game bird hunting in New Zealand may only be undertaken with shotguns, by licenced hunters and by landowners, who must also comply with other hunting regulations.

7. Fish & Game has the statutory mandate to manage the following game bird species:
 - a. Black swan.
 - b. Grey duck.
 - c. Mallard duck.
 - d. Paradise shelduck.
 - e. Shoveler duck.
 - f. Pukeko.
 - g. Chukar.
 - h. Red legged partridge.
 - i. Pheasant.
 - j. Australian or brown quail.
 - k. Californian quail.
 - l. Virginian or bobwhite quail.

Clubs and Ranges

8. Shooting Clubs and Ranges are essential for the future of shooting sports in NZ and are places where new and young shooters are mentored in safe environments. New Zealand has a long history of shooting clubs and ranges, and these clubs and ranges are already well-regulated and have an exceptional history of safety and responsible operation.

9. Fish & Game NZ has a long history of many decades supporting shooting clubs and organisations in the work they do in safely fostering and encouraging shooting sports. Many of our game bird hunter licence holders will participate in pre-hunting season shoots at club ranges. Fish & Game supports and sponsors junior shooting disciplines, which encourages young people under supervision in shooting sports and competitions, to learn to shoot in a safe environment. Many of our licence holders are hunters and shooters who are also members of clubs and use shooting ranges to practise and enhance their shooting skills and refresh on safety aspects.

Submission Points

Part B: Non – Pistol clubs

Issue Statement

10. We agree with the issue statement for non-pistol clubs. We agree that it is essential that clubs are able to operate without over-regulation, so as to provide safe places for shooting sports and hunter shooting practice.

Non-Pistol Clubs will need to enrol

11. We agree with the proposal to remove the need for non-pistol clubs to be approved, and instead to require those clubs to be enrolled, and to provide the information as outlined in the proposal. This will streamline processes for clubs while still ensuring there is a record maintained of non-pistol shooting clubs, and relevant information about those clubs.

Compliance Tools

12. We agree with the proposed tools to encourage compliance including that the regulator can enter and inspect a club and documentation as outlined, provided that is for a reasonable purpose. It is reasonable that it should be an offence if a non-pistol club is operating while unenrolled. We however abstain from commenting as to what the penalty should be for such a breach other than to state that a maximum penalty of \$10,000 (as is the current maximum penalty for non-certification) is in our view excessive; we would hope that in any event education and encouragement to rectify breaches will achieve compliance.

Will the proposals ensure the safe possession and use of firearms within non-pistol clubs?

13. Our view is that simplifying regulations and making them as practicable as possible will lead to the best outcomes in terms of safety along with better outcomes in terms of education and training of shooters. This will encourage clubs to continue to operate rather than face the prospect of closure due to overly expensive, complicated and bureaucratic regulations.
14. This will provide safe places for new and young shooters to learn under expert tutelage and supervision. This will also provide a place where those who have been firearms licence holders for some time can practice, and refresh skills and safety procedures.

Agreement with the overall policy proposals for non-pistol clubs and suggestions

15. We do agree with the overall policy and proposals for non-pistol clubs. We acknowledge that it is necessary to have a regulatory oversight of clubs and this proposal is an improvement on the current regulation in place to date. We note the current fees for non-pistol clubs' Certificate of Approval is currently arguably minimal (\$140 initial fee and \$30 to \$40 annually ongoing); and we feel it is important for the ongoing viability of these clubs, which are operated by volunteers, that fees should be non-existent or kept minimal under the enrolment system.

Part C: Non-Pistol Shooting Ranges

Issue Statement

16. We agree with the issue statement for non-pistol ranges. We agree that these ranges have excellent records of safety over long periods of time. The current regulatory requirements are costly, time-consuming and are not demonstrably contributing to a higher level of safety overall. Our understanding is that smaller clubs with limited financial resources are struggling not only with the costs to comply but also with the processes required to comply with certification, which is likely to lead to the closure of some clubs and ranges. This will lead to the closure of ranges, which removes places where hunters and shooters can practice shooting in a safe and regulated environment.

Removal of Certification for non-pistol ranges.

17. We agree with removing certification requirements for non-pistol ranges, and instead replacing this with a requirement to comply with shooting range standing orders which are approved by a governing body or by the regulator, rather than standing orders approved by the regulator alone. This ensures an oversight system remains in place regardless, however, in a more practical manner and at what we would envisage is a lesser cost and with less administration.

Requiring Compliance with Standing Orders

18. As outlined, we agree with the proposal to require compliance with standing orders approved by a governing body, or by the regulator – as the case may be. This is more in line with ranges (and clubs) regulating themselves to a large extent, rather than being governed externally as to how they operate.

Compliance Tools

19. In our view, it is essential that the regulator does have tools to encourage compliance and we suggest that that should be similar to the compliance tools which will be in place to encourage clubs to enrol. However, education and encouragement should be the primary tools to achieve compliance.

Will the proposals ensure the safe possession and use of firearms at non-pistol ranges?

20. We agree with the changes proposed overall and consider that simpler regulatory processes and making ranges able to operate without excessive bureaucracy and costs will make them more accessible to shooters, thus leading to safer outcomes. It is essential for ranges to be operating within governing body standing orders which clubs and ranges agree to, as this is also more likely to lead to better and safer outcomes.

Agreement with the overall policy proposals for non-pistol ranges

21. We do agree overall with the policy proposals. We consider ranges as essential places for shooters, especially new and young shooters, to be able to go to learn, gain skills and experience and most importantly be tutored in safe shooting practices. This is far more desirable than a situation where some ranges may eventually cease to exist due to excessive regulation and cost. This would then lead to shooters practising or sighting in firearms in places that are less than optimal, and without the necessary safety parameters in place.

Final Statement by Fish & Game NZ

22. We support the proposals to review and simplify these parts of the Arms Act 1983. Hunting and shooting are popular recreational pursuits in New Zealand, especially in rural and provincial areas. Hunting and Shooting clubs and the shooting ranges many of these clubs operate are vital to the ongoing safe use of firearms in NZ. Without them there would be a huge gap in training and in places where hunters and shooters can go to sight in firearms, to practise and engage in competition shooting events. Expensive over-regulation is likely to cause the demise of many shooting clubs and ranges, but pragmatic, and reasonable regulatory requirements that are demonstrably required and fair will lead to support from the hunting and shooting communities in NZ and ultimately safer outcomes.

A handwritten signature in blue ink, appearing to be 'C. Jordan', is centered on a light gray rectangular background.

Corina Jordan, Fish & Game New Zealand CEO

20 June 2024