



Women's International League for Peace and Freedom

*United Nations Consultative status with ECOSOC, UNESCO and UNCTAD
Special relations with the ILO, FAO, UNICEF, and other organisations and agencies*

WILPF Aotearoa Section, PO Box 2054, Wellington 6140

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Submission re Arms (Shooting Clubs, Shooting Ranges, and Other Matters) Amendment Bill

This submission is being made on behalf of Women's International League for Peace and Freedom Aotearoa Section.

The purpose of the amendments to the Act is unclear to us. The Minister has provided only anecdotal hearsay that some people in some clubs might be facing difficulties but not what explicitly they are and so how the changes will address those difficulties. There is no factual evidence to support the proposed changes. Rather, it is based on unsubstantiated rumours that the current regulations are forcing the closure of clubs and ranges. The current regulations should remain in place at least until all ranges have been assessed and we have a better idea of the risks.

The Act currently requires all shooting clubs to hold a certificate of approval issued by the Commissioner of Police and for all shooting ranges to be certified by the Commissioner. The certification process should remain.

The Bill creates a distinction and different levels of regulation between pistol and non-pistol shooting clubs and between pistol and non-pistol shooting ranges.

WILPF considers there should be no distinction – firearms are firearms and all pose danger.

From the Bill:

The Bill introduces a simpler regulatory regime for non-pistol shooting clubs and non-pistol shooting ranges. All non-pistol shooting clubs and ranges will be required to enrol to operate legally. The enrolment status of a non-pistol shooting club will continue until the club requests cancellation of its enrolment or the club ceases to operate. Similarly, the enrolment of a non-pistol shooting range will continue until the range requests cancellation of its enrolment, it ceases to operate, or the operator fails to comply with an improvement notice.

All establishments where guns are used should be subject to the same stringent requirements to enhance public safety. This lax overview of enrolment, relying on the club or shooting range to notify authorities if the club no longer operates does not offer the certainty of certification.

From the Bill:

The Bill also changes the provisions relating to inspections of shooting clubs and shooting ranges. Currently, inspections of clubs and ranges can occur at any time provided at least 7 days' notice is given. The Bill provides more certainty about when inspections will occur. Currently during an inspection, documents, including electronic documents, can be removed. To simplify the burden on operators (many of whom are volunteers), the Police will, during an inspection, only be able to remove hard copies of documents, including those that are printed from electronic versions.

WILPF does not understand how notification of inspections will improve public safety. When clubs and shooting ranges are acting properly, an unnotified inspection and/or the removal of any documents, either hard copy or electronic, will present no difficulties.

From the Bill:

Currently, all clubs must be incorporated if they sell ammunition. This enables the Police to track the movement of live ammunition to support public safety. The Bill requires non-pistol shooting clubs to be incorporated if they sell ammunition, unless the ammunition is purchased for, and used on the day of sale at, the club range or event, and if it is not taken off the premises.

WILPF supports the status quo and again cannot see how this exception improves public safety. Tracking live ammunition serves to reduce the risks of hoarding or theft and Police need to be able to do so. Whether it is used on the day or not is immaterial.

In conclusion, WILPF Aotearoa does not support this Bill. We can see no benefit to public safety for any changes proposed in the Bill. It makes changes to the regulation of clubs and ranges that weaken the protection of public safety. The current regulatory system, despite not yet being fully implemented, has been uncovering significant safety shortfalls and should remain in place.

Megan Hutching

National Coordinator, WILPF Aotearoa