

9 November 2022

Committee Secretariat
Justice Committee
Parliament Buildings
Wellington



Submission on the Arms (Licence Holders' Applications for New Licences) Amendment Bill

About the New Zealand Game Animal Council

The New Zealand Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory agency with responsibilities for, *inter alia*, advising and making recommendations (in relation to game animals) to the Minister of Conservation, raising awareness of the views of the hunting sector, and liaising on and managing aspects of game animal hunting. Game animals are feral pigs, chamois, tahr, and all species of deer.

The GAC currently represents hunters on the Firearms Community Advisory Forum (FCAF) as well as the Range Certification Engagement Group (RCEG) and works through these forums as well as our statutory functions to promote firearms safety which includes advising the NZ Police, the Department of Conservation, and other agencies on the use of firearms for hunting.

Arms (Licence Holders' Applications for New Licences) Amendment Bill

1. The Game Animal Council is fully supportive of the intention of this legislation and welcomes the urgency given to progressing it through Parliament. The current situation with regards to the licence renewal backlog has caused significant stress for many in the hunting community.
 - a. Firearms licence holders are currently experiencing significant delays going through the renewal process. We are advised that there are currently around 4,500 historic cases (people) within the 11,000 renewals that Police are currently managing.
 - b. The current processing period, which can last well over a year in some cases, not only means firearms licence holders lose the use of their firearms but forces them into arranging relocation of their firearms and ammunition with a friend or associate (who has the appropriate approved storage) in order to comply with the Arms Act. For some people this is extremely difficult, if not impossible.
2. Over the next few years Police will experience a surge in licence renewals due to the phenomena created by the move to 10-year licences in 1992 and the subsequent decision to apply that en masse. This legislation is critical to ensure that the backlog for renewals, which will inevitably grow, does not unfairly impact legitimate firearms users including recreational and commercial hunters, hunting guides and pest controllers.
3. This legislation will provide hunters and other firearms users with confidence that as long as they submit their application in advance of their licence expiring, they will retain the full rights of a firearms licence holder.

4. The Game Animal Council supports new section 8A.
 - a. The renewal of a dealer's licence takes effect from either the date on which the licence expires if the renewal is issued before the licence expires, or, the date on which the renewal is issued if the renewal happens after the licence expires.
5. The Game Animal Council supports the proposed new section 25A.
 - a. If the application is granted before the holder's current licence expires, the new licence will take effect from the expiry date of the holder's current licence, or if the application is granted after the holder's current licence expires, the new licence will take effect from the date the new licence is issued.
6. There are a number of practical issues that this Bill does not directly address that need to be provided for, including but not limited to:
 - a. The buying or selling of an arms item or ammunition. At present this requires a current firearms licence. We expect measures to be put in place to allow those with an expired licence who have, before that licence expired, applied for a renewal to be able to buy and sell arms items or ammunition. This requires providing dealers with a simple means to verify that the holder of an expired licence has entered the renewal process.
 - b. The means of verification that is required (such as an endorsement sticker, letter, or temporary licence) for the administration and compliance for shooting clubs and ranges as well as any other situation where firearms licence holders are undertaking commercial or recreational activities using their firearms.
 - c. The ability for hunting guides on an expired licence and in the renewal process to loan and share firearms with clients under supervision also needs to be verifiable.
 - d. It is critical that provision is made for any licence endorsement and/or conditions on a licence holders expired licence to remain valid until their renewal has been processed and the applicant has been informed of the outcome.
7. The Game Animal Council strongly encourages Police to proactively communicate to firearms licence holders and firearms user groups not only the intent of this legislation but the practicalities, as outlined above. At a minimum this should be done immediately upon Parliament passing this legislation, as a permanent fixture on the Police website and directly with the firearms licence holder as soon as they apply for a renewal.

The Game Animal Council would welcome the opportunity to appear before the Select Committee in support of this submission in person or via video link. If you have any queries relating to this submission, please contact me on 021 688 531 or at tim.gale@nzgac.org.nz.

Yours sincerely



Tim Gale
General Manager
New Zealand Game Animal Council