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Harm Reduction and Public Safety Policy Group
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Feedback on targeted consultation on a new approach to regulating shooting clubs and ranges

About the New Zealand Game Animal Council

1. The New Zealand Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory agency with responsibilities for, amongst other things, advising and making recommendations (in relation to game animals) to the Minister for Hunting & Fishing, raising awareness of the views of the hunting sector, promoting firearms safety, and liaising on and managing aspects of game animal hunting. Game animals are feral pigs, chamois, tahr, and all species of deer.
 2. The GAC is a member of the Firearms Community Advisory Forum (FCAF) as well as the Range Certification Engagement Group (RCEG). Our role in these forums is to raise awareness of the views of the hunting sector and fulfil our statutory functions to promote firearms safety to the NZ Police, the Department of Conservation and other agencies.
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New Zealand hunting sector

3. The number of game animal hunters in New Zealand is not formally documented, however estimations put it at somewhere between 50,000 and 80,000 people.
4. Outdoor recreation, food gathering (and donation of wild harvested food) and commercial harvesting through hunting are an important part of many New Zealand communities. Reasonable access to firearms is critical to ensure that communities can participate in recreational and commercial hunting activities and contribute to the provision of free-range wild protein for their families and communities.
5. Hunters also play a key role in the management of wild animals and conservation. A 2014 study estimated that recreational hunters alone are responsible for harvesting approximately half a million game animals and pest goats each year. This management is important to maintain the health of the environment, look after indigenous species and maintain good quality game animal herds.
6. Firearms, in and of themselves, are not the primary reason people go hunting. In many respects they are merely the tool to carry out the activity. Hunters often do have an interest in firearms that comes from knowledge and experience of their use, much like a mountain

biker will develop an understanding of different mountain bikes and their strengths and weaknesses.

Better Hunting Safety & Education Programme

7. The GAC launched our online hunter training platform, Better Hunting, in late 2023. Better Hunting consists of two e-learning programmes that provide new and inexperienced hunters with education and safety information on the essentials of hunting and firearm usage (for hunting) in the New Zealand context.
 8. The Firearms Essentials programme includes theoretical content on firearms safety, accuracy and technique. To fully understand and train on the concepts included in Firearms Essentials, a hunter-learner requires access to a shooting range to practice and develop their competence.
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Key principles

9. Reasonable access to the activity of hunting relies on the reasonable access to firearms as well as the facilities whereby a hunter can participate in practical firearms safety and technique training, often under the expert supervision of others. This is particularly important for new and inexperienced hunters.
 10. The importance of ethical hunting and animal welfare must also be recognised within the context of shooting clubs and ranges. Shooting clubs and ranges provide hunters a place to practice and sight-in their rifles – activities critical to enhancing a hunter’s accuracy and ethics.
 11. Regulation, particularly when it imposes an additional compliance burden on the community and volunteer sector (the backbone of many rural and small-town ranges used by hunters), should be used sparingly and to specifically target a known problem.
 12. Prior to the most recent regulatory changes, the GAC is not convinced there is sufficient evidence of safety issues on ranges and in shooting clubs, nor that most of these recent regulatory changes have contributed to an increase in public safety.
 13. The GAC broadly supports the changes proposed in the discussion document.
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Part A: Pistol shooting clubs and the ranges they operate

14. The GAC’s statutory functions are limited to the hunting and management of game animals (deer, tahr, chamois and wild pigs) and therefore we have no responsibility for pistol shooting clubs and ranges.
15. Many complexes have a mixture of both rifle and pistol shooting so there is a small amount of ‘spill over’.

Part B: Non-pistol shooting clubs

16. The GAC broadly agrees with the issue statement and is concerned that onerous compliance will restrict accessibility to shooting clubs as places for people to learn and practice shooting and firearm technique within a safe environment.
17. The GAC agrees with the proposal to remove the requirement for non-pistol shooting clubs to be approved and replace that with an enrolment. The GAC has previously expressed concern that clubs are being asked to provide information for approval that is overbearing and overly complex.
18. We agree there is risk in the current approval process leading to the closure of clubs who find the criteria too complex to achieve. This is a particular issue for smaller rurally based clubs that rely on volunteers and will have a negative impact on the safe use of firearms in the parts of New Zealand where legitimate firearms use is at its highest and is most important (pest control, hunting, food gathering, etc).
19. The enrolment proposal provides the regulator with sufficient information for oversight of a club's activities while significantly reducing the compliance burden on the clubs themselves. We support this.
20. The GAC agrees that approved security and storage requirements remain mandatory where the storage of firearms and/or ammunition is intended for overnight stay. We know that the greatest risk with regards to firearms in the New Zealand community is when they fall into criminal hands. It is critical therefore that clubs and ranges follow tight procedures to ensure the security of stored firearms.
21. The GAC agrees that a non-pistol shooting club should be registered as an incorporated society if firearms and/or ammunition are sold on the non-pistol club's behalf. Registering as an incorporated society is preferable over a club being subject to dealer requirements and having to comply with the burdensome licensing system that demands.
22. The GAC agrees with the proposed enforcement mechanisms and see these as reasonable.
23. The GAC strongly supports the enrolment of non-pistol shooting clubs and agrees with the proposed offence. We also agree that \$10,000 is an appropriate maximum penalty with discretion to be applied based on:
 - the harm caused and the nature of the conduct
 - if the penalty will effectively deter the conduct
 - if the option is workable and appropriate to the regulated group, and
 - that the penalty should be fair.
24. The GAC does not believe the new proposals elevate the risks to public safety from shooting clubs because we do not believe sufficient evidence of enhanced safety was provided to support the imposition of the current system on these clubs. We are still unclear as to what purpose is served through the provision of a club's annual reports and other onerous compliance.

Part C: Non-pistol shooting ranges

25. The GAC agrees with the issue statement that the current compliance burden is in-excess of the safety risks associated with shooting ranges. We also agree that the previous system incorporating a range manual was effective at providing sufficient safety guidance and compliance.
26. The GAC acknowledges the expertise and experience of the New Zealand Deerstalker's Association (NZDA) and its branches as the largest and most active hunting-focused manager of shooting ranges in the country. We encourage officials to engage constructively with NZDA on the safe and practical management of shooting ranges in both rural and urban settings.
27. We are also concerned about recent feedback we have received from NZDA that indicates current regulations have impacted NZDA's excellent HUNTS 'hands-on' hunter training courses. Restricted access to facilities for teaching and training has a direct safety impact.
28. Anecdotally, the GAC has been made aware that current regulations have effectively frozen the nationwide network of ranges meaning no new ranges are being opened. It is suggested that the hunting community is increasing in size, with the implication that more ranges, not less, are required to provide hunters the training, practice and sighting-in opportunities required to be safe and effective.
29. The GAC has not seen any evidence to suggest that range certification has led to any overall improvement in safety or that ranges, prior to the current regulatory regime that requires certification, were intrinsically dangerous facilities.
30. We do agree that ranges should need to comply with shooting range standing orders approved by a governing body or the regulator. This is a reasonable level of compliance that sets out safety risks and mitigations.
31. Newly established ranges set up on public land for the community should have standing orders that outline the maximum calibre that can be safely used on that range to ensure longevity of the range's lifespan. These ranges are a public good supporting safe firearms practices, therefore should be funded by the Crown.
32. One-off competition ranges, HUNTS course ranges, should be allowed so long as they adhere to the FSA Range manual and not be subject to enrolment. These ranges provide an obvious 'public good'.
33. The GAC agrees that approved security and storage requirements remain mandatory where the storage of firearms and/or ammunition is intended for overnight stay. We know that the greatest risk with regards to firearms in the New Zealand community is when they fall into criminal hands. It is critical therefore that clubs and ranges follow tight procedures to ensure the security of stored firearms.
34. We see the compliance tools as proposed for pistol ranges as appropriate to apply to non-pistol ranges. While the maximum penalty of \$10,000 is also appropriate, we would expect discretion to be used, particularly for minor non-compliance issues within smaller volunteer-run ranges.

35. The question is asked - *Will the proposals ensure the safe possession and use of firearms at non-pistol ranges?* This is not the right question to ask. The right question is - *Will the proposals contribute to the safe possession and use of firearms at non-pistol ranges?* It is wrong to assume that safety rules and compliance are merely a reaction to government-imposed regulation. In almost all cases rules, guidelines and protocols would be voluntarily developed and implemented to ensure the safety of a club's members or range users regardless of central government intervention. Safety is in the best interests of all range users and managers.
36. The GAC considers proposals that reduce the administrative burden on smaller, volunteer-run or temporary ranges to be a sensible step. Temporary volunteer-run ranges may only be used infrequently and typically to allow hunters, farmers and pest controllers to sight-in firearms. Despite their infrequent use they are an important facility in more isolated communities but are susceptible to onerous compliance that can easily lead to permanent closure. The effect of such closures is to drive hunters and others to undertake their sighting-in in a potentially unlawful manner i.e. at the local riverbed or another secluded location. In this way over-the-top regulation does not improve public safety, it reduces it.
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The Game Animal Council welcomes the opportunity to contribute to this targeted consultation process.

If you have any queries relating to this submission, please contact me on 021688531 or at tim.gale@nzgac.org.nz.

Yours sincerely



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New Zealand Game Animal Council