



NATIONAL RIFLE ASSOCIATION OF NEW ZEALAND INC.

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Dear Members

Firstly, my apologies for not getting this out to you last week.

Ross Mason, NRANZ Chairman, and myself had a face-to-face meeting with the Police Firearms Group last Thursday so I wanted to wait until we had been through that process. We were the last of the shooting bodies to have the 90-minute meeting.

The COLFO Club and Range Submission Pack is also being sent to you all. It is a comprehensive guideline that has been done in conjunction with the shooting organisations, using the COLFO Lawyers and COLFO's PR advisors. I would also recommend the TSNZ guideline document which is available from the TSNZ website.

We will outline the areas that we really want your support on but I also urge you to use the COLFO document to expand your submission.

It is important that you put in a submission in your own words but use the guidelines.

At the start of your submission give an outline of your shooting involvement and your club shooting discipline, or disciplines.

It would be easiest to use the submission form provided. If you disagree with some of their proposed tick box options then say so. The tick boxes are designed to get the answers they want.

The deadline for submissions is the 4th of May, so time is of the essence.

Please read the following notes with reference to the Police Discussion Document

CLUBS

Response. Q2-5. Requirements should be removed

The Incorporated Societies Register has club constitutions already for incorporated clubs.

The **National** Target Shooting Organisation's should be recognised as providing governance and rules for their Affiliated Clubs in the form of a Constitution and Rules which govern our Range Control and Practices.

We have an impeccable safety record now without further unnecessary regulation.

In the NRANZ Constitution under Objects:

The Objects of the Association shall be:

2.1 To coordinate and regulate the activities of fullbore rifle clubs and rifle associations throughout New Zealand whose members are affiliated to the Association.

2.3 To promote safety, responsibility and proficiency in the care and handling of firearms.
(Says it all really so why make clubs duplicate it into their club documents)

Response. Q6. No to adding these requirements, and definitely No to Audited accounts as an Audited account needs an accountant to do this. Not normal practice now to have them audited.

We think the ammunition and the firearms should be separated and treated as separate items throughout these regulations.

Clubs bulk buy ammunition for their members. Often these are annual club purchases done on an indent or similar system. It is not generally club members selling ammunition, rather **it is** the club and is done through the club accounts. NRANZ has one Club Ammunition Officer for each club that they work with.

Clubs do not deal or trade in firearms, rather they have club rifles which may be upgraded or replaced from time to time.

Response Q11. No to requiring club committee members to hold a FAL.

Response Q17-24. No to any age restrictions or limitations on what an unlicensed person may partake in.

The requirements for supervision of an unlicensed person are quite clear in legislation already.

It should be recognised that the controlled club environment is the best place for a person to learn and it should be encouraged, not prohibited or restricted.

These proposals will simply send them out into an uncontrolled situation to do their learning.

Young people want to shoot. That can be seen by the numbers that take part in organised and safely controlled school competitions in all the target shooting sports throughout New Zealand.

Response Q32 –33. Sale of Firearms and Ammunition. Separate ammunition from firearms.

The whole section is stuck on club members selling ammunition. As a rule they don't, the club does.

This whole section is micromanagement for a problem that does not exist.

No to recording of details of club ammunition use by members or visitors in the club environment.

No to recording of use of club rifles.

Both of these would impose a lot of paperwork for no gain in safety, especially iii – viii.

The requirements of daily record keeping are unworkable at a practical level.

The Incorporated Societies Act already covers the reporting that is required and prohibits individuals making a financial gain from the club.

Sale of firearms will be covered when registration gets imposed.

Response Q34. Club Annual report to the Commissioner.

Affiliation to a National target Shooting Organisation would cover off most of this.

Incorporated Societies covers off financial transactions.

A simple form should be available.

Response Q37 and Q39. Fees. No to fees.

There is no private benefit to these regulations.

This is a government-imposed regulation which will do little to improve the safe operation of ranges. The National Target Shooting Sports are already very safe and have an impeccable safety record. The cost imposition will likely be detrimental to small clubs and their continued existence. The first-time costs don't give clubs any time to build up the funds for the proposed fees along with all the other associated changes and costs such as the Range Inspectors.

RANGES.

Response Q42. Range Certification documentation.

Landowner permission in writing not be needed for certification where no written permission exists. Most ranges rely on the goodwill of landowners and no formal permissions are used or exist.

Response Q48 and Q49. Officer on Duty (Range Officer)

Yes to a register of qualified persons.

No to recording of the OoD (Officer of Duty). In a small club where all members shoot this role could change very often during a club event, down to the stage where it could be half hourly. So long as the OoD is qualified, the rules are that you must have one, this is sufficient.

Response Q55. Range Standing Orders. RSO.

The draft Police Range Shooting Manual is used as the base document.

The contents need to be set out in regulation, after consultation has taken place.

This document does not take into account the new Range Certificate.

Many of the details listed in the PRM as being required in RSO more correctly belong in the Range Certificate.

The RSO should be clear on the day-to-day operation of the Range and be a readable and easily understood document for all club members.

Clubs will have to state they are shooting on a certified range. The requirement for clubs to have their own RSOs is duplicating documentation. The certified range documentation is the place for RSOs.

Response Q58 No to a sign with range rules.

Response Q59. Police informed of RSO changes.

Restricted to significant changes.

Malcolm Dodson
NRANZ President