

# **The Sportsman's Association**

*Of Great Britain & Northern Ireland*  
**FIGHTING FOR FAIR AND EFFECTIVE FIREARMS LEGISLATION**



## **Quarterly Newsletter 30/9/2022**

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## Hello Everyone,

Many thanks to all of you who completed the Value of Shooting Survey. Hopefully with many responses from all the different disciplines of shooting it will help the organisations that lobby for us to assemble a more accurate assessment of our value to the economy and society. The economy always gets talked about, and less importance is placed on the friendships and working relationships that are built within our community, both nationally and internationally. However, without those relationships there is no economy.

## Firearms Safety Consultation

The Firearms Safety consultation paper was published on 24/11/20 and closed on 16/2/21. It invited comments on a range of firearms safety issues which were raised with the Government during the passage through Parliament of the Offensive Weapons Act 2019. The paper sought views on proposals for how the law might be changed to mitigate the public safety risks potentially raised by High Muzzle Energy Rifles, Air Weapons, Miniature Rifle Ranges, and Home-Made Ammunition.

Members of the public accounted for 67.7% of respondents. Members of the public who identified themselves as members of the shooting community accounted for 22.8% of respondents. Shooting organisations accounted for 2.5% of respondents, but they do of course represent many thousands of members.

High Muzzle Energy Rifles – 83% of respondents agreed that the present level three security arrangements are adequate.

This part of the consultation also asked questions on the installation of additional security measures:

1. Fitting shutters and grilles on all doors and windows – 83% disagreed – 5% agreed.
2. Installing CCTV – 56% disagreed – 25% agreed.
3. Fitting of panic alarms where rifles are stored – 68% disagreed – 13 % agreed.
4. Panic alarms available on ranges when using rifles – 77% disagreed – 8% agreed.
5. Bolt or critical component to be kept separately – 60% agreed – 28% disagreed.
6. Other club members storing critical components – 77% disagreed – 10% agreed.
7. Ammunition to be kept in separate cabinet, and quantity restricted – 51% disagreed – 33% agreed.
8. Rifles to be stored only at a gun club – 93% disagreed – 4% agreed.
9. Rifles to be stored with a RFD – 94% disagreed – 4% agreed.

**Government Response** - Government intends using section 53 of the Firearms Act 1968 to mandate level 3 security for HME rifles through a change to the Firearms Rules. Alongside this change, the Firearms Security Handbook will be amended to ensure that the possession of HME rifles is a risk factor for the application of level 3 security measures and that consideration is given to the separate storage and transportation of essential components and ammunition

### Air Weapons

Should the exception for unsupervised under 18's to possess air weapons on private land be removed? – 80% disagreed – 14% agreed.

Should the offence of “failing to take reasonable precautions” to prevent under 18's access to air weapons be clarified? – 64% agreed – 28% disagreed.

Should the shooting industry provide security devices and inform on safe handling and storage of air weapons at point of sale? - 72% agreed – 18% disagreed.

**Government Response** - Government intends to proceed with clarifying ‘reasonable precautions’ and on working with industry to improve safety and security. Government has decided not to proceed with the amendment to remove the age 14-17 exemption for air weapons because of the very high level of opposition to this measure, but will keep it under review and further action could be taken in the future.

### Miniature Rifle Ranges

Should you have an FAC to operate a Miniature Rifle Range? 71% agreed – 20% disagreed.

Should, only rifles not exceeding .22 rimfire be considered as miniature rifles? – 74% agreed – 16% disagreed.

Should self-loading .22 rimfire rifles NOT be considered to be miniature rifles? – 71% disagreed – 18% agreed.

**Government Response** - Government intends to proceed with the proposed change to the Firearms Act 1968 so that the miniature rifle range exemption is limited to .22 rimfire weapons. Government intends to introduce a requirement for the operator of a miniature rifle range to be issued with a firearm certificate. Alongside this change, amendment to the Home Office guidance and the introduction of new conditions relating to miniature rifle ranges, will ensure that the operation of miniature rifle ranges in future will be within a secure and safe framework. Considering that the future arrangements for miniature rifle ranges will incorporate controls to ensure proper supervision and a safe environment, the Government does not intend at this stage to remove the ability for self-loading firearms to be used, although this will be kept under review.

Finally, a number of respondents indicated that lower-powered air weapons (those that do not fall within the definition of ‘specially dangerous’ as they are air rifles not exceeding 12 ft pounds or air pistols not exceeding 6 ft pounds) should be excluded from the new requirement for a certificate. The Government agrees with this view, on the basis that these air weapons are not licensed in England and Wales. Therefore, if the miniature rifle range or gallery only uses lower-powered air weapons, it will continue to be the case that the operator does not require a firearm certificate.

## Home-Made Ammunition

Should possession of component parts of ammunition, with intent to manufacture unauthorized quantities of complete rounds of ammunition be an offence? – 62% agreed – 28% disagreed.

**Government Response** - Government intends to make it an offence to possess component parts with intent to assemble unauthorised quantities of ammunition. The offence will be drafted in a balanced way to meet the clear concerns that it should not impact adversely on the legitimate home loading of ammunition or other legitimate uses.

Further to this, BSSC has proposed this change in wording, “to possess component parts with intent to assemble **UNAUTHORISED** ammunition”, which the Minister of State (at the time) Tom Pursglove, has accepted in principle.

On 20 June 2022, a Firearms Bill was put forward in the House of Commons as a presentation Bill. It was ordered that the Bill should be drafted and ready for Second Reading in March 2023.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1090903/Firearms\\_Safety\\_Consultation\\_-\\_Government\\_Response\\_-\\_11072022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1090903/Firearms_Safety_Consultation_-_Government_Response_-_11072022.pdf)

## **Firearms Licensing: Review of The Statutory Guidance for Chief Officers Of Police**

The Home Office are currently reviewing how well the Statutory Guidance for Police is working since being introduced last November. There will be no re-writing of the guidance and we await the outcome of the review with interest.

## **Lead – Sorry to be so Boring, but this is very important!**

### **How to Assess the Loss of Terrestrial Birds from Lead Ingestion in Europe**

On 29/8/22 a paper was published on how to more accurately assess the number of land-living birds which die annually from lead poisoning, both directly, and indirectly by being weakened from lead poisoning. The method proposed uses carcass data, and population models.

Step 1 is to evaluate the percentage of carcasses that died from lead ammunition ingestion using data already available, and to convert this percentage into an annual mortality rate. Step 2 uses population modeling to evaluate the changes in population growth and size, based on carcasses, rather than to assume that populations decrease annually by the mortality rate. The effects of non-lethal lead poisoning on potential mortality, and reproduction, are also estimated.

The paper does not set out to definitively quantify the reduction in bird populations from lead ammunition poisoning but to offer a more reliable method of calculating the effects, and identify the additional data needed to improve on estimates using this method.

Two types of bird, susceptible to lead poisoning from managed and unmanaged hunting grounds across Europe, excluding shooting ranges, were used in the paper. The final percentages after pooling across countries in Europe for gallinaceous birds were 0.2% for direct and 1.4% for the ultimate estimate of lead-shot-ingestion-caused deaths, with a midpoint estimate of 0.8%. The corresponding averages for raptors with bullets included were higher at 2.5% for direct and 7.9% for ultimate percentages of lead-ingestion-caused deaths, with a midpoint estimate of 5.2%. These percentages are much lower than those submitted by the ECHA.

The Paper concludes:

*“Although our results using the proposed method are preliminary because of data gaps and uncertainties, they suggest that lead ingestion is not impacting the sustainability of the European terrestrial bird populations as a whole. Finally, other stressors are strongly impacting European gallinaceous and raptor populations, and we recommend those stressors be analysed and modeled using the same approach we have proposed herein for lead poisoning.”*

This link takes you to the paper: [Method to assess the potential magnitude of terrestrial European avian population reductions from ingestion of lead ammunition | PLOS ONE](#)

This is an article on the paper: a bit easier to read

[Are the pillars of the EU’s lead ammunition ban starting to crumble? – EURACTIV.com](#)

This paper challenges the data being used by ECHA for the proposed restrictions on the use of lead ammunition, and therefore challenges the data used by REACH UK, as our government has mostly copied the EU.

### **Other Challenges to the ECHA Data**

[\\*FACE Submission 29.08.2022.pdf](#)  
[Summary of FACE Submission.pdf](#) an easier and quicker read.

FACE are also challenging much of the **scientific data** being used particularly with regard to risk to humans from consumption of game. I am not a highly educated scientist or medic, but have waded through the REACH EU and UK documents and whilst they are filled with studies on the matter of risk to humans, they are not conclusive that the risk to IQ or Chronic Kidney Disease from lead poisoning to the game eating human is greater than the risk to non-game eating humans. Of all the reading I have done only one study makes a direct comparison between the two groups.

“Claims related to CKD differ from the alleged IQ loss, as the former can be empirically validated by research whether there is a statistically significant difference in the prevalence of CKD between hunters consuming game meat and the general population. This could be done without hypothetical model and thin assumptions. For example, a 2008 study (N=734) jointly released by the North Dakota Health Department and the Centres for Disease Control assessed blood lead levels of participants who consumed and did not consume game meat. When accounting for variables, it found that participants

who ate wild game “had **0.30 µg/dl** higher PbB in comparison with those who did not consume wild game”. That is statistically insignificant.”

Data being used by both sides of the argument which caught my attention was on the blood lead levels thought to cause a 1-point IQ loss in children, this has been assumed/assessed at 12 µg/L. Data published 2003-2006 in Germany from an environmental survey puts blood lead levels for children at 17 µg/L, well above the threshold that is said to cause a reduction in IQ. Yet the same survey in 2019 puts blood lead levels for children at 3.5 µg/L, well below the threshold for damage.

What happened between 2006 and 2019 for blood lead levels to drop so dramatically. Since shooting was unaffected during that time, surely whatever changes in ingestion or inhalation of lead which occurred in these thirteen years is far more relevant than how much lead shot game we eat. Especially when the papers being used to support the restriction themselves conclude “Green and Pain (2015) reported that, in general, the bioavailability of dietary lead derived from ammunition (the proportion of the ingested amount which is absorbed and enters the blood) can be expected to be lower than that of lead in the general diet. This is thought to be because some of the ingested ammunition lead may remain as metallic fragments after cooking and digestion.”

Given more time and of course money, and dare I optimistically say co-operation between both sides of the argument to produce more robust and evidence-based studies in the environment, not the laboratory, we would be better able to prove the actual risks to the environment, wildlife and human health. But we do not have that time, and so are not likely to make any headway with REACH UK and the government with such arguments.

### **So How Best to Answer the HSE Consultation?**

The questions in the consultation do not appear to be for individuals. However, you don't have to answer them all. Please persist with the document and answer as many questions as you can. Keep your answers simple and to the point, and avoid any answers that could undermine our arguments.

The NSRA have produced a very good response on their website, which they want shared with the entire shooting community. They provide some accuracy tests on the differences between lead and non-lead ammunition for small calibers.

[NSRA Message to all Shooters 1.pdf](#)

[Lead in Small-bore Target Shooting Final.pdf](#)

BASC have also produced a response from their perspective:

[BASC's position on UK REACH lead ammunition restriction proposals - The British Association for Shooting and Conservation](#)

The NRA have yet to publish guidance on how to respond to the consultation but are reaching out to affiliated clubs with a survey of their own:

“We have carefully reviewed the questions posed in the HSE consultation on their recent report that proposed restrictions on the:

1. use of lead bullets for outdoor target shooting, with a derogation for shooting at licensed ranges with appropriate environmental protection measures;
2. use of lead bullets for hunting; and
3. sale and use of lead shot, with a derogation for authorised athletes on licensed ranges.

Working with the major target and quarry shooting organisations, we have decided to survey regional range operators, clubs and members to improve the accuracy of our response to the consultation.

The survey will include questions on lead recovery from ranges, quantities of lead projectile used, and use of non-lead alternatives.

NRA Clubs that operate their own outdoor range are being invited to complete an on-line survey. The information provided will allow the NRA to respond to HSE proposals to restrict the use of lead ammunition on outdoor ranges.

E Mail invitations have been sent to the Secretary of Clubs that operate their own outdoor range. If your Club operates an outdoor range and does not receive an invitation, please contact [Georgina.Thatcher@nra.org.uk](mailto:Georgina.Thatcher@nra.org.uk)”

MLAGB are similarly asking their members to respond to a survey so that they can answer the HSE consultation as accurately as possible. Contact [chairman@mlagb.com](mailto:chairman@mlagb.com) if you are a member and have not received your email invite.

All the organisations are working hard on this, both independently and together, but it needs the personal touch from each and everyone of us to have the most impact, so please try and complete the consultation before 6/11/22. Here are the links:

[UK REACH – Restriction Proposals 004 - Lead shot in ammunition - Health and Safety Executive - Citizen Space \(hse.gov.uk\)](#)

[A4template-online \(hse.gov.uk\)](#) – Annex 15 restriction report

[A4template-online \(hse.gov.uk\)](#) – Annexes

## Commonwealth Games 2026

On 19/8/22 the International Shooting Sports Federation (ISSF) submitted an Expression of Interest to the Victorian Government and Commonwealth Games program under Phase 2 intake of sports. Sadly, shooting was once again not considered a core sport.

In preparing the submission, the ISSF received strong support from the World Para Sports (WSPS), the International Confederation of FullBore Rifle Associations (IDFRA), and the Commonwealth Shooting Federation (CSF). The City of Greater Bendigo and the nearby town of Echuca are nominated to host the shooting.

Shooting Australia fully support the ISSF submission of an EIO and are committed to ensuring shooting is given the best possible chance of being included in the 2026 program.

Chief Executive Officer Adam Sachs says “Throughout the process we have seen significant commitment from key stakeholders. There has been fantastic engagement from a diverse range of people and organisations at local, state, national and international levels. The unified support for Shooting’s inclusion in the VIC 2026 Commonwealth Games indicates the importance of this event to our sport and is evidence of the commitment that Shooting will bring to the successful planning and delivery in 2026.’

Shooting’s proposal aligns strongly with both the CGF’s and Victorian Government’s assessment criteria for a ‘Phase 2’ intake of additional sports and provides opportunities for each of Shooting’s traditional Commonwealth Games disciplines to be contested, albeit with reduced numbers of athletes and events compared with previous Games. Sachs continued, “We are aiming for equal medal opportunities for male and female athletes and in a Games first for any sport, we are proposing that in some disciplines, Para-Shooting athletes will shoot alongside their able-bodied teammates for the same medals in a fully-integrated Team event.”

The Victorian Government and Commonwealth Games Federation are expected to make the decision on the additional sports to be added to the 2026 Commonwealth Games program by October, 2022.

Lets hope the Australians are successful and put our country to shame for not including shooting in the Commonwealth Games held this year, and if unsuccessful lets hope the Indians take it on themselves to host the shooting, as they would have done for us if Covid had not ravaged their nation.

Fingers crossed, Rachel Westlake.