

The Sportsman's Association

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



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Season's greetings to everyone,

It has been a difficult year for nearly everyone, with the availability of supplies, cost of supplies, ongoing threat of lead restrictions on ammunition, and delays in service from firearms licensing departments. Let's hope Santa drops some good cheer into our stockings for next year.

The BSSC Response to UK REACH Proposal on Restrictions of Lead Ammunition – Extracts from their Submission.

The British Shooting Sports Council (of which we are a member) is an umbrella body which brings together Britain's major shooting associations to achieve consensus positions on political and legislative issues affecting the shooting sports. It is a non-profit making organisation financed by its member associations' subscriptions. The Council's object is to promote and safeguard the lawful possession and use of firearms and air weapons for sporting and recreational purposes in the United Kingdom amongst all sections of society.

*Together these associations represent some 650,000 licenced gun owners across the UK together with an unknown number of airgun users and the UK civilian gun trade. Our member associations would therefore be impacted in a variety of different ways by any restriction on the use of lead in ammunition. While the hunting associations have already adopted a voluntary process of transition for some aspects of their members' shooting activities, **in the case of target shooting, which neither produces game meat nor discharges lead beyond the ranges over which it operates, we do not agree that the proposed restrictions advanced by HSE are proportionate to the human health or environmental risks.***

Bird Mortality - *We do not deny that some birds may be at risk, but we question the figures. In 'Method to assess the potential magnitude of terrestrial European avian population reductions from ingestion of lead ammunition' (Plos One, August 29, 2022), Meyer et al state that current estimates of terrestrial bird losses across Europe from ingested ammunition are based on uncertain or generic assumptions. They propose an alternative method of estimating the magnitude of lead ammunition ingestion on terrestrial birds which includes estimation of change in mortality and reproductive rates and estimation of change in population size, growth rate and quasi-extinction rate which is different to the modelling methods used in the literature quoted by HSE. The two-step methodology outlined by Meyer has not yet been applied to population data for UK bird species which are regarded as vulnerable, but it would appear that if it were, then the 'at risk' numbers quoted by HSE would be reduced. **This would, in our opinion, justify a re-evaluation of the timescales and transition periods within which HSE/UK REACH proposes to restrict the use of lead ammunition and specifically lead shot used for hunting.** The trade who are very much committed to lead free and plastic free shotgun cartridges have already said that it will be nigh on impossible to achieve this in a five-year timespan, as initially promoted.*

Human Health – *(The risk to human health, the bio availability of lead in game, and the quantity of game consumed by infants is disputed – in conclusion) Our view is that while there may indeed be some risk to human health from the ingestion in game meat of metallic lead originating from shotgun pellets or bullet fragments, that risk is considerably lower than has been suggested. Such a reduction in risk level would, again, justify a revaluation of the timescales and transition periods within which HSE/UK REACH proposes to restrict the use of lead ammunition for hunting.*

Hunting with Shotguns - BSSC supports the principle of a transition to non-lead ammunition for live quarry shotgun shooting in shot sizes and loads which are normally used by live quarry shooters, but at a timescale which can be delivered by the gun and ammunition trade without unnecessary disruption to the sport of game shooting. However, we believe that an extended timescale is required for the ammunition industry and gun trade to develop, manufacture and distribute suitable alternatives for small calibre shotguns.

BSSC agrees that appropriate labelling of ammunition should be developed, with the support and assistance of the gun and ammunition trade and the Proof Houses, to ensure that the shooting public is properly informed about products placed on the market.

Hunting with Large Calibre Rifles - In the case of large calibre centrefire (6.5mm and greater) rifles used for hunting, we would accept a restriction on the sale or purchase of lead-based expanding ammunition after the conclusion of a suitable transition period. While a restriction on the use of smaller calibre (below 6.5mm) centrefire ammunition might be desirable, we would argue that the technical difficulties are such that considerably more time is required by the industry to develop suitable non-lead expanding ammunition, and we propose that any transition remains open to review until there is certainty that a range of suitable ammunition which is fit for purpose is available.

Rimfire Rifles - For around 15 years, manufacturers of sporting firearms and ammunition have been working both individually and together on the substitution of lead by any other suitable materials. Research and development departments have invested considerable resources to find products that could also satisfy the lead-free demand from precision sport shooting disciplines. When currently available non-lead ammunition is used, a rimfire rifle, even when clamped, shoots a random group which is significantly worse than can be achieved by an elite shooter using lead ammunition.

While a restriction on the use of rimfire ammunition for hunting might be desirable, we would argue that the technical difficulties are such that considerably more time is required by the industry to develop suitable ammunition, and we propose that any transition remains open to review until there is certainty that a range of suitable ammunition which is fit for purpose is available. We do not believe that a restriction on the use of rimfire ammunition for target shooting is proportionate or necessary.

Airguns - Competitive shooting with the .177 air rifle or pistol at 10 metres requires extreme precision. Non-lead pellets are commercially available in low quantities and are generally made of tin-zinc alloy, or alternatively of pure tin or zinc, but at present only lead pellets are capable of achieving the necessary degree of precision.

Given the negligible risk to the environment and human health, the fact that the overwhelming proportion of airgun pellets is fired indoors, and the difficulty of enforcing legislation in an environment where neither conventional low-powered airguns nor their ammunition are controlled, we do not believe that a restriction on the use of airgun ammunition for either hunting or target shooting is proportionate or necessary.

Clay Target Shooting – the types of shotguns and loads used is discussed, as is the layout and management of shotgun ranges. The impracticality of licensing shotgun ranges for very small numbers of elite athletes and the rules of international shotgun competition which stipulates the use of lead shot is also discussed.

It is the view of BSSC that lead ammunition fired on formally registered and approved clay target grounds does not represent a significant risk to bird life, the environment or human health, and that any restriction of it is disproportionate.

Full-Bore Target Rifle Shooting – The types and calibers of rifles is explained along with the construction of ranges, and the management and recovery of bullets from the butts/bullet catchers. There is considerable crossover in range use between civilian and military, police and emergency services shooters. Many civilian rifle clubs shoot over Ministry of Defence ranges, where the bulk of ammunition used is inevitably military lead bulletted ammunition. Civilian target shooters are prohibited from using non-lead ammunition on military ranges. Likewise military personnel and cadet forces compete extensively at civilian ranges. Thus military, cadet, police and other emergency services personnel conduct firearms training and compete at civilian ranges.

It is noted above that virtually no bullets are embedded in the ground between the firing points and stop butt, or travel over the stop butt to fall in the safety area, and it is therefore maintained that any prohibition on agricultural activity within a rifle range or over the safety area behind it is disproportionate.

Given that target rifle shooting does not produce game for human consumption, given the fact that bullets fired almost entirely end up in stop butts from which they are recovered and recycled as a matter of course, given that ammunition designed for and used by target shooters is distinctive from that used for hunting, given the inextricable linkage between civilian, police and military usage of rifle ranges, and given that no discernible leaching of lead salts from stop butts occurs, it is argued that a restriction on the use of lead ammunition for target shooting is disproportionate.

We therefore propose that Firearm Certificate holders whose rifles are conditioned for target shooting should continue to be permitted to purchase, possess and use lead-based ammunition.

Historic, Heritage and Vintage Breechloading Firearms – The types of historic guns held, and under which bits of law is explained. *There is currently no viable alternative to lead or lead core bullets which does not damage barrels of historic/heritage/vintage arms. We have seen examples where a harder modern non-lead bullet has caused irreparable damage to the barrels of historic rifles while, in any event, the use of harder bullets will cause greater and quicker barrel wear. In addition, such use may cause dangerously high pressures. Once any damage is caused, the firearm as a historic item is irrevocably degraded, and even if repair is possible, it will no longer remain in its original state, and its value as a heritage item is lost.*

*Many older shotguns were built with ‘Damascus’ barrels, which were manufactured by forge-welding soft iron around a mandrel into a tube. Barrels of this type are considerably softer than modern barrels, and are not suited to steel shot, which will cause damage. Even bismuth is harder than lead and may cause damage over time. **For target shooting on shooting grounds, we propose that for such vintage shotguns, along with certain specialist and rare historic firearms such as Paradox type rifled and rifled choke shotguns, use of lead ammunition should continue to be permitted.***

Muzzle Loading Firearms - *Muzzle loading firearms include both original antique arms and modern reproductions. There are well established competitions for muzzle loading rifles, smoothbore muskets, muzzle loading pistols and shotguns, and even miniature smoothbore cannons. International rules for muzzle loading competitions stipulate the use of lead shot. The proof houses in Italy and Hungary, both C.I.P. accredited, have reported that there are no safe alternatives to lead projectiles for muzzle loading arms.*

Where muzzle loading firearms are used on rifle or pistol ranges or on formal clay shooting grounds, their use of lead bullets or shot is of no greater risk to the environment or human health than the lead ammunition used on those ranges and grounds by breech loading firearms, and it is the view of BSSC that any restriction on the use of lead on ranges or shooting grounds by muzzle loading guns would be unnecessary. Given the minimal volume of use of lead ammunition by field use of muzzle loading arms, it is the view of BSSC that any restriction would be disproportionate to the risk.

Practical Shooting – A brief summary of Practical shooting is given, with a description of the firearms used, how they are licensed, the construction of ranges and examples of lead recovery from the ranges. *All shooting is undertaken with lead ammunition in compliance with IPSC regulations. Lead ammunition will deform and fall safely to the ground after striking a steel target, whereas non-lead ammunition would pose a serious ricochet hazard. All shots taken with slugs are fired into a stop butt, which is usually of sand. The shotgun will be specifically conditioned for target shooting.*

It is therefore proposed that a Firearm Certificate holder with a shotgun thus conditioned by the police for participation in practical shooting disciplines should be authorised to acquire and possess lead ammunition for use in those disciplines.

Transitional Periods for Hunting - The BSSC sets out very clearly the technical, and supply of materials, difficulties the industry faces in a transition to lead-free ammunition. ***BSSC is of the view that HSE overstates the risk to the environment and to human health from the continued use of lead ammunition and underestimates the practical implications of change. We therefore feel that the transition periods it has proposed both for shotgun and rifle ammunition used in live quarry shooting are disproportionately short, and do not allow the gun and ammunition trade time to develop, manufacture, supply and distribute sufficient stocks of suitable cartridges to enable live quarry shooting to continue without very significant disruption.***

FACE Petition

FACE, the association of European shooting organisations has launched a petition to the European Commission and is seeking signatures from all whom support shooting whether or not they are in the EU. The petition calls on governments to work with hunters to improve biodiversity and habitats rather than working against hunting. The closing date for signatures is in April next year. There are now more than 150,000 signatures on the petition. For the first six months more signatures were obtained in the UK than in any other European country with the current number running at 24,000. *This will be more as I wrote this a little while ago.*

[Sign For Hunting | FACE European Federation for Hunting and Conservation](#)

EU's Security and Defence: A Moratorium on The EU's Proposal on Lead Ammunition is Required

Due to the current escalation of events taking place in Eastern Europe, EU Member States are facing a sudden surge in demand for small arms ammunition. The European Chemicals Agency's Restriction proposal concerning the near total ban of lead in ammunition, if adopted in the way currently proposed, will compromise the EU's security and defence sector. A moratorium is needed in order to avoid small arms ammunition supply shortage and the consequent reliance on import from non-NATO countries.

The ability of EU manufacturers to produce more ammunition hinges on the possibility of converting civilian production lines, thus avoiding relying on companies based in non-NATO countries.

To find an alternative to lead which is acceptable from an EU defence procurement and NATO standards perspective will take at least 10 years. Once that alternative is found, the switch in civilian production can be made and the "effet utile" can truly be given to the defence exemption currently in the Restriction Proposal.

For the full article use this link: [EU's security and defence: A moratorium on the EU's proposal on lead ammunition is required – EURACTIV.com](#)

ECHA Continues with Proposal to Ban All Lead Ammunition

The European Chemicals Agency (ECHA) proposal to ban the sale and use of all lead shot, except for on shooting ranges, under very strict conditions, and to ban the use of lead in bullets and other projectiles with very narrow derogations continues despite the efforts of FACE. One of the latest developments is a proposal to shorten the transition period for a ban from 5 years to 18 months.

[All news - ECHA \(europa.eu\)](#)

In September, two public consultations were published by ECHA. The first concerns the socio-economic aspects of a ban and the second is concerned with data on lead in game meat. FACE is working closely with representatives of national hunting associations to develop a strong submission.

The latest iteration of the ECHA background document to the ban has also been published. This shows that substantial amendments, many of which are based on FACE's suggestions, have been made. The document refers to FACE submissions 52 times.

After the two consultations close, the opinions from ECHA's scientific committees are expected to be finalised in early 2023. Once ECHA's work is complete the European Commission will produce a legal proposal under the REACH regulations, which will be discussed with the 27 EU Member States in the EU's REACH Committee. Once approval has been given at this level, the European Parliament will have three months to carry out its analysis, but they cannot change the text, only accept or reject the proposal. The regulations are expected to be agreed in late 2023.

Europe remains the major market for British game, with up to 80% of British shot game exported to the EU.

Retained EU Law on Deactivated Firearms

The following has been written by Barry Johnson of the Deactivated Weapons Association, and promising discussions between Home Office, Police agencies and BSSC have ensued. Please use it to lobby your MP for more sensible law. Deactivated firearms are not a threat to public safety and the EU imposed over-regulation to notify transfers is both costly and pointless. The current law preventing the transfer of what are referred to as defectively deactivated firearms, because they are not deactivated to the latest standard, impacts living history, and re-enactors massively, for no public benefit.

Retained EU Law – Legislation relating to controls on deactivated firearms

- An official UK deactivation standard for firearms was first introduced in 1988; a set specification for the processes required to deactivate a firearm along with formal inspection and certification via one of two Government approved proof houses
- Revisions of the standard through to 2010 made it the safest and most robust standard in the world
- Throughout these revisions, a retrospective clause was never introduced, i.e. firearms deactivated to previous official standard could continue to be owned and retailed
- As a knee-jerk reaction to the Charlie Hebdo atrocity (where converted blank firing weapons rather than deactivated firearms were used), the EU introduced a common deactivation standard in April 2016
- This standard was universally condemned as being impossible to implement as written, and far less robust than the UK specifications which it replaced. Further, it included a retrospective clause meaning that although firearms deactivated to a previous member state standard could continue to be owned, they could not be transferred without first being brought up to the (inferior) EU standard
- UK authorities recognised the weaknesses in the EU standard and introduced additional UK-specific measures and processes required for firearms deactivated in the UK
- As part of the EU Firearms Directive implemented at the same time as the EU deactivation standard, the rapporteur for the directive (Vicky Ford MP), achieved a concession from the EU, with agreement that it would consider the equivalency of Member states previous deactivation specifications against the EU specification
- Despite this assurance and work from stakeholders in the UK, including Home Office Licencing, The National Crime Agency, and UK Proof Masters, the submission made to the EU for equivalency was never seriously considered, partly because BREXIT was by this time well under way
- In 2017, the Policing and Crime Act introduced Section 8A of the Firearms Amendment Act. This legislation enforced the retrospective clause of the EU legislation by introducing an offence for the transfer of any firearm not deactivated to the current specification
- The EU deactivation standard was further revised in 2018 to improve its inadequacies. The retrospective clause was retained, meaning that all previous standards (including the first EU standard) could not be transferred
- Throughout the process the UK has reluctantly followed EU law, despite the weaknesses in the EU deactivation specification and the enormous business and personal impact this has had on UK citizens
- This has not been the case across some other EU Member States who have not complied with the requirements of the EU specification, resulting in unsafe and readily convertible firearms being available in the EU and potentially in the UK
- **We respectfully request that as part of its review of EU retained law, the Government considers amending Section 8A of the Firearms Amendment Act to exclude from its definition of a defectively deactivated firearm, not only all firearms deactivated to an EU specification from 2016, but also to exclude any firearm that that been deactivated to an official UK standard from 1988 to 2016.**

Review of the Statutory Guidance for Chief Officers of Police

The BSSC have responded to the Home Office review of the Statutory Guidance asking for greater clarity of the medical proforma, and that GP's should be assured that no liability would attach to them in respect of information provided about applicants.

BSSC also expressed the need for better guidance where seizures and surrenders, of firearms and certificates, take place. Also, that when certificates are extended, because the police have not completed them in time, a letter of extension MUST be issued.

There is also concern about the ongoing delays in firearms licensing with grants still being on hold for many areas, and different forces only giving medical reports a six-month lifespan, which compounded with the delays is increasing the burden on the GP's and the cost to the licensee.

Discussions with the Police over the last year have seen little improvement in service, and definitely little compliance with much of the statutory guidance, the matter will now be taken up with ministers.

Proposed Plans for FEO's to be Accredited and Assessed

A proposal was put forward by Andy Marsh, the chief executive of the College of Policing, to a Home Affairs Committee on policing priorities held in November. "One of the areas that we are looking at now, with Home Office partners, is whether, following the tragic shooting in Plymouth, firearms licensing officers should be annually accredited and assessed by the College of Policing."

This sounds promising, and if implemented might go some way to having better informed firearms enquiry officers and a more consistent service across England and Wales.

Home Office Review of Approved Clubs Liaison Officers

Discussion over the role of Home Office Approved Club police liaison officers proceeded at a meeting of the Home Office 'Task and Finish' group on September 29th. It was agreed that BSSC would discuss the matter with the governing bodies of target shooting and would offer its proposals for a formalisation of the qualities of, and role of the police liaison officer.

Firearms Fees Review

On July 25, the Home Office updated the BSSC on the progress of its Fees review, explaining changes to the collection of data about the processing of certificate grant and renewal by a range of forces. It also agreed to clarify with HM Treasury which activities fall within 'compliance and monitoring' and which fall within 'enforcement' so that licensing costs could be properly apportioned. A fees meeting was scheduled for September 19, but cancelled owing to the funeral of Her late Majesty Queen Elizabeth II. Due to the delays the government's aim to introduce an increase in the Spring of 2023 is unlikely to be achieved.

Medical Markers

After waiting two years for the medical marker to be digitally applied to certificate holders in England and Wales it finally happened, only to be withdrawn after two weeks. We are still waiting for the IT problems to be resolved in England. Wales appears to have abandoned it for the time being.

This was published by the NHS 4/12/22:

*The rollout of the new **digital** marker process began in July 2022. The rollout has been temporarily suspended on EMIS systems due to a technical issue. The **digital** marker is still available on TPP systems. The pre-existing manual process remains available for use in the interim when a firearms application is received.*

Value of Shooting Survey Results

Analysis of the data gathered is currently being drafted into a report for early next year. Priority is being given to the financial information for use in the HSE socioeconomic consultation, The full report will be launched at the Game Fair 2023.

Sound Moderators

Talks to remove sound moderators from firearms certificates have begun with support from the Police and no objection from the Home Office.

The Firearms Act 1968 states that an accessory designed to reduce the noise or flash of a firearm when fired is to be subject to certification in relation to the firearm with which it is to be used.

A properly fitted sound moderator will reduce the sound of a shot by approximately three quarters. This protects the shooters hearing, and decreases any noise disturbance in the surrounding area. The reduction of muzzle flash and recoil are also beneficial.

Sound moderators are not required to bear any identification marks or serial numbers, and most do not do so. The maker's name is therefore often listed as 'unknown' and the identification number is generally listed as 'none' on a firearm certificate. Nevertheless, they are a controlled item and thus when a certificate holder wishes to replace a moderator he must:

1. Dispose of moderator A
2. Provide evidence of disposal to his licensing department (e.g. RFD receipt)
3. Seek a variation to his certificate
4. Acquire moderator B
5. Notify his licensing department within 7 days

Sound moderators are widely used with low powered (sub 12 ft lb) air rifles. Such air rifles and their accessories are not controlled by S1 of the 1968 Act. Since a sound moderator takes on the legal classification of the firearm to which it is fitted, a .22 moderator when fitted to a rimfire rifle is subject to certification but the same moderator, when fitted to a .22 air rifle, is not.

When removed from the rifle a sound moderator can in no way be used to fire a bullet and is therefore no threat to public safety.

Administration of the controls on nearly 200,000 sound moderators inevitably involves firearms licensing departments in much work. Not only is this work unnecessary in terms of protecting the public, but it also erodes the time available for the essential task of licensing firearms and shotguns. The British Shooting Sports Council therefore proposes that S57 of the 1968 Act is amended to remove the requirement for licensing of sound moderators.

This will require primary legislation, and could possibly be done at the same time as amendments to the S11(4) are done.

Trophy Hunting

In a previous newsletter I wrote the following: "Private Members Bills rarely succeed without the backing of the Government, but they are used to highlight campaigns and issues, and influence legislation. However, John Spellar's Trophy Hunting Import (Prohibition) Bill, now scheduled for a second reading on 6/5/22 may yet succeed where the government has dropped the Animals Abroad Bill."

It seems I may have been right. The Government is now backing this bill to meet its manifesto commitment. There is considerable support from the back benches for this bill, which will make defeating it difficult.

Bill Wiggin MP gave a very good speech at the second reading. His reflection was that the Bill does not, in fact, just deal with "rare and endangered" species and as such goes beyond the manifesto commitment. This could be a good line to take in terms of working out which species are going to be involved.

[Hunting Trophy Import \(Prohibition\) Bill - Parliamentary Bills - UK Parliament](#) .

Regards, Rachel Westlake.