

The Sportsman's Association

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



Quarterly Newsletter 31/3/2024

The Sportsman's Association
PO BOX 2379
Salisbury
Wiltshire
SP4 4AN

www.sportsmansassociation.co.uk
Email: info@sportsmansassociation.co.uk
membership@sportsmansassociation.co.uk
mobile 0752 508076
Landline – 01722 703976

Hi Everyone,

Thank you to those of you who let me know you had responded to the Government consultation on sound moderators. It is not known exactly when the government intend to proceed with this Legislative Reform Order, in July, was whispered into my ear at the BSSC luncheon, but we will have to wait and see.

The issue of sound moderators on licenses is not unique to UK. The American Suppressor Association is seeking Federal approval for sound moderators which are currently subject to licensing and restrictions in USA, on a state-by-state basis. ASA are watching what happens in the UK with interest.

Rachel Westlake.

Controls on Crossbows

There is yet another consultation in progress at the moment, this one on Crossbows, which will be of interest to those of you who do Archery or Re-enactment. The consultation is a call for information and evidence regarding the introduction of licensing of crossbows on public safety grounds.

Government figures state there were less than 10 homicides by crossbow since 2011. Using figures from Statista.com there were 602 homicides in 2022-23 in England and Wales, of which 41.4% were committed with a sharp instrument, and only one with a crossbow. Killing without a weapon was the next largest percentage at 19.3%, and killing by shooting just 4.9%.

There are currently age restrictions on possession and use of crossbows, similar to those with airguns, and a ban on hunting animals with them. The Government are interested in whether there should be a licensing system to control the use, ownership and supply of crossbows. This is all as a consequence of one man who gained entry to Windsor Castle armed with a crossbow and no good intentions. You have until 9/4/24 to respond.

[Controls on crossbows - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/controls-on-crossbows)

Restrictions on Lead in Ammunition - UK

HSE has requested a six-month extension to review the 8000 responses to the Socio-Economic Consultation on restrictions of lead in ammunition which ended 10/12/23. They are expected to publish their report in the summer, but will confirm this after discussions with DEFRA, and the Scottish and Welsh equivalents.

UKPSA has an interesting article on their response to the above consultation:

[HSE Lead Consultation 2024 - UKPSA](#)
Restrictions on Lead in Ammunition – EU

REACH EU will not meet before the EU elections in June 2024 to discuss the EU wide proposed restrictions on lead ammunition. The need for military supplies of lead-based ammunition has had a strong effect on the development of legislation. EU companies manufacturing military and civilian ammunition on the same production lines have stated that military supplies could be compromised if a lead ban were introduced.

The European Shooting Sports Forum are using this time to establish more realistic timeline for the phase out of lead, and for the implementation of lead recovery on shooting ranges. The suggested costs to upgrade ranges and recover the lead are extremely high.

There is some interesting information on the ESSF website:

[About ESSF - Lead in Ammunition](#)

The International Practical Shooting Confederation which represents 60-70% of all international shooting sports is facing particular challenges. Many of their courses of fire involve shooting at steel plates, where ricochet from non-lead bullets is a real danger.

Local Elections here in UK

2/5/2024 is when the local elections, and Police and Crime Commissioners elections will be held.

The PCC is responsible for holding the Chief Constable to account, for agreeing the police budget, and the policing plan.

This includes ensuring the Chief Constable fulfils their statutory responsibilities for firearms licensing, i.e. issuing firearms licenses efficiently, managing voluntary surrenders in a TIMELY manner, following the Statutory Guidance and the College of Policing Approved Professional Practice, with public safety being foremost in their decision making.

Turn out for PCC elections is generally low, so you could have quite an impact with your vote. BASC have set up a way of finding out who your PCC candidate is, and how to contact them for their views on firearms licensing before you vote. Please use the following link, BASC have opened this up to everyone, not just their members.

[PCC elections and firearms licensing - BASC](#)

[Statutory guidance for police on firearms licensing - GOV.UK \(www.gov.uk\)](#)

[Firearms licensing | College of Policing](#) – Approved Professional Practice

[Firearms licensing | College of Policing](#) – short notice of removal of firearms certificates

General Election 2024?

What the political landscape will look like after the expected General Election is anyone's guess. Whilst we have the two main contenders, Conservative and Labour, we now have pressure from Reform UK as well as Liberal Democrats and Greens. But one pressure group/new party that might have aims close to your hearts is Rural Reaction.

Rural Reaction launched themselves on 1/10/23, their aim to target rural conservative constituencies on matters close to the countryside. They have taken heart from the influence lobbying on issues like fox hunting and trophy hunting has had on MPs votes.

Ian Gregory, a PR and political lobbyist who launched the party has stated "The key thing is not about winning seats, it's about shifting the debate so that the big parties now have to consider rural voters. To force the Conservative Party and the Labour Party to think about what views of the countryside are, instead of just playing for urban animal rights activists. Rural reaction can shift who has key jobs (in government) and can even shift government in a very tight election."

Follow this link to find out more: [Rural Reaction](https://www.ruralreaction.uk) - <https://www.ruralreaction.uk>

Trophy Hunting

The Hunting Trophies (Import Prohibition) Bill has rumbled on for quite some time and was defeated last autumn. As the Lords debated the bill the Earl of Caithness Malcolm Sinclair highlighted that emotion rather than logic had been at the root of the bill, and that expert evidence had been ignored.

The Lords tabled 60 amendments to the bill, and insisted on debating them one at a time, and so ran out of time, and defeated the bill. A technique known as filibustering.

A joint statement from Botswana, Namibia, South Africa, Zambia and Zimbabwe High Commissioners says "We are grateful to the peers who presented well researched arguments, based on scientific evidence, in support of our regional position." They have argued that sustainable hunting "feeds families, puts children through school, funds anti-poaching units and ultimately secures the long-term viability of the habitats and species we all care about so much."

A further Bill was not included in the King's Speech suggesting that government do not intend to give the matter any further parliamentary time.

However, Labour MP John Spellar is not content to let this be. He is sponsoring a private members bill, "Hunting Trophies Import Prohibition Bill" to prohibit the importation of all hunting trophies into Great Britain. The bill was debated in the House of Commons on 22/3/24, with the government supporting it, and has passed with 49 votes to 0. It now has a race against time to get through the Lords before the next general election. So not expected to succeed.

Back Dated Firearms and Shotgun Licenses

Due to delays in granting renewals and new licenses, the practice of back dating licences when the renewal has been issued after the 8-week extension period has expired, has become a controversial topic.

Legal opinion has been sought by the BSSC. The Firearms Act 1968 section 28B is the law that applies here.

Notably, the statutory 8-week extension is automatic, provided that the application for renewal was lodged more than 8 weeks before the certificate expiry date and only one 8-week extension is allowed: the police have no power to grant a “rolling extension”.

So, if a license is issued after the 8-week extension expires what should the start date be? As in law the license will have expired and not been renewed.

The opinion is: *“Section 28B only allows backdating of the issue of a certificate in cases where a decision on renewal is made (and perhaps also notified) within the 8-week extension period. If a certificate is issued outside that period, it must rank in law as a fresh grant rather than a renewal, so run from the date on which it is issued rather than the date on which the previous certificate expired.”*

If this is the case, does the applicant have to pay a top up fee, to that of a new license grant? Which is more than the fee of the renewal, even though the applicant has done all that is required of them, and it is the licensing authority’s failure to complete the renewal in time. Or for those whose licenses have been backdated but had to lodge their firearms with a RFD while they waited, will the police refund them an equivalent part of the fee for the time they have not had access to their firearms?

Royal Mail Reverses Decision on Carriage of Knives

Royal Mail announced in February that they would no longer deliver knives and other bladed items across their network from 22/4/24.

Just this week they have reversed that decision, effective from 7/5/24 for some items (restricted), which can be sent using their age verification service. Other items will still be prohibited. This is the result of pressure from retailers and interested parties, for whom a blanket ban would have caused severe difficulties for their business, especially the online business’s.

Restricted Bladed Items - These include any knife or knife blade, including cutlery knives, bread knives, knives that can be used for hobbies and trades (for instance, utility knives and snap-off cutters, gardening, camping, lock knives, bushcraft and farming tools with a blade or any other trade tool that could commonly be described as a knife), butcher knives (including meat cleavers), felling axes and razor blades.

Prohibited Bladed Items - Hunting/combat/survival type knives, daggers, movie knives (such as Rambo or Crocodile Dundee style knives), replica fighting knives (such as Bowie knives), throwing knives, machetes, swords, fantasy knives, knives with images or words that suggest use for violence, stiletto knives, battle axes, open razors/folding razors and any similar items.

[Bladed items; Sharp objects and Weapons: from 07 May 2024 \(royalmail.com\)](https://www.royalmail.com/news/2024/05/07/bladed-items-sharp-objects-weapons)

World Forum on Shooting Activities

The WFSA is an association of hunting, shooting, and industry organizations. Founded in 1996, and consists of more than 50 associations and organizations from around the world. It represents over one hundred million sport shooters and hunters. For more than twenty years, the WFSA and its member organizations have attended every major UN conference affecting hunting or sport shooting.

The WFSA is a scientific and educational organisation, working in concert with international bodies, national governments, and regulatory authorities, for the worldwide promotion and preservation of hunting and sport shooting activities. The World Forum aims to promote fact, and science-based, solutions to the many complex issues related to firearms possession and use.

Graham Downing, the Secretary of the BSSC, is the current President of the WFSA and keeps the BSSC abreast of the WFSA's work. Here are a couple of items from the assembly held in February:

Up-coming UN Arms Trade Treaty – Proposals have been put forward for the creation of a new liability standard, and due diligence requirement, for the firearms manufacturing industry. This is a dangerous development placing liability on the manufacturers should the firearms they have manufactured be misused. It is intended to affect any part of the industry, including distributors, dealers, storage facilities and so on. The UN has no mandate over private industry, but the Mexican and Latin American countries behind this proposal have little regard for that. It is hoped that pressure from the defence industry on EU states, will encourage the EU states to block the progress of this proposal.

Restrictions to Trade – WFSA are going to conduct a survey on restrictions to trade for the firearms industry. Many suppliers are severing business relationships with the firearms industry out of fear of reputational and financial risk. This fear is being driven by political pressure, environmental/social activists and over complicated, contradictory regulations around the world.

[WFSA – The World Forum on Shooting Activities](#)

World Pay v Sportsman's Association

As part of World Pays due diligence, they require the following of the controlling members of the businesses/organisations that use their services:

Please provide the following for all directors and for all individuals who have significant control* of the company:

- • Full Name
- • Date of Birth
- • Residential Address(es) covering the last four years. This should include any time spent abroad
- • Nationality
- • In-date Copy of Passport or Driving Licence for the significant controllers*

This must be a clear photo showing all four corners of the Passport/Driving Licence and must be legible.

- Share Percentage of Voting Rights by each individual

Additionally, please provide:

- Your business website (if any)
- The nature of your business in detail. E.G., what products/services are being processed? How are our products/services being used in relation to your business model?

This information has been provided to them whenever they have requested it, but this year they wanted more. Firstly, a copy of the minutes from the last AGM, so I dutifully did as requested. Then they wanted the same information as above for three of the members who attended the AGM.

I asked them why: *Please explain why you want the details of the three association members named below. We have 900 members within the association, there is no way I am providing the personal details of all or any of the members who are not on the committee.*

WorldPay's response: *As we are FCA regulated, we're required to comply with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 <https://www.legislation.gov.uk/ukxi/2017/692/contents/made> - we're also required under this legislation to complete reviews on existing customers under part 3 Chapter 1 27.8 to ensure that we hold the correct information and that we're complying with the most recent regulations.*

To that end, under the Terms & Conditions of your agreement, you are obliged to "comply promptly with all requests for information that we make for the purpose of meeting our operational and legal requirements to carry out Customer Due Diligence in relation to you (including providing personal information about your directors and beneficial owners)"

My reply: *I have provided you with the information of the controlling members of the Association, that is myself, Savvas Toufexis, Joe Beatham and Alan Westlake. We are the Committee.*

The people you have named below are members of the association and are entitled to vote, once a year, at the AGM, as are the 900 other members. None of them have access to the accounts of the association, or are involved in the day to day running of the association. You do not need their information and I will not divulge the personal details of our association's members.

After several phone calls with them and more emails, I received this: Following our previous communications and attempts to obtain information to verify your business account with us in compliance with regulatory and due diligence requirements, unfortunately the details requested have not been provided.

We refer to our previous termination letter and the terms and conditions and related documents which govern your relationship with Worldpay (UK) Limited and/or Worldpay Limited (together "Worldpay") for the provision of acquiring services and other payment processing services (the "Contract").

We've carried out a detailed review of your account which may have taken into consideration:

- your application
- your industry sector
- your business premises
- information provided by you to us for onboarding including any financial details
- information provided by third parties

Our findings in this review and the failure to receive the information we have requested in previous notices have led us to reconsider our relationship with you and we now confirm that we will terminate your Contract in accordance with Clause 12.5(k) and our previous termination letter as at the date of this letter (the "Termination Date").

We now have an account with DNA Payments, which, so far, has proved to be much easier than with WorldPay.

We now have a virtual terminal on the Association laptop, so we are using less electricity and paper. There are more security checks with this new virtual terminal, and I can email a receipt straight to you while I am on the phone with you.

There is also a Pay Link which I can send you, this can be time restricted, i.e. to the expiry date of your current membership, but gives you several online options of payment in the privacy of your own home, so I never get to see your card details, making them more secure.

Not that I store or share your card details anywhere. That would be non-compliant with regulations, and we are all very good at compliance with regulations!

De-banking

As the previous two items have shown we are not alone in our struggles with financial providers. De-banking was on the agenda of the last BSSC meeting with many shooting clubs and firearms related businesses suffering, with analysts flagging our sport/trade for review due to action against money laundering and terrorism by financial institutions.

The Gun Trade Association are meeting with banks to discuss the problem.

A Cheery End to the Newsletter

I like to end on a cheery note, but have searched my notes, and the internet and this time can't find anything. So, I will wish you all a Happy Easter and best wishes for the Spring with warmer weather and hopefully more good shooting.

