

The Sportsman's Association

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



Quarterly Newsletter 30/12/2024

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,

Seasons Greetings to you all for the festive season.

It has been an odd year! With the call of the general election, everything the shooting associations had been working on with police and government came to a halt, then there was a continued absence of direction while the new government settled into office, and now we face the final hurdles with two of the hardest challenges for shooting sports, firearms licensing fees and REACH UK's proposal for the restriction of lead in ammunition. – We have our work cut out for us, so make merry over the Christmas holiday and we will get on with the difficult stuff in the New Year.

With regard to domestic admin this year, we have opened a savings account with Skipton Building Society and transferred £80k into there. Also, in November we received a BACS payment of £580 from an unknown source. If anyone has accidentally paid this into our account, please will you get in touch and we will return the money.

The website has been having a bit of a facelift too. This will be an ongoing project, but the look and information on the site is becoming more up to date. Unfortunately, PayPal have been very unreliable and largely uncommunicative with help to fix problems with the PayPal buttons, so we are switching to DNA Payments for our online payment service. We currently use them for card payments over the phone. We will retain our PayPal account for everyone who has a subscription in place.

We are also venturing into the electronic/pdf membership card. This is convenient for those who do everything on their phone, for the rest of us plastic cards remain available.

Regards,
Rachel Westlake.



REACH UK Proposal for Restrictions on Lead in Ammunition

This was published on 13/12/24 and is the final opinion of REACH UK, with their recommendations to the Secretary of State for the Department of Environment, Food & Rural Affairs, currently Steve Reed OBE MP. [Contact information for Steve Reed - MPs and Lords - UK Parliament](#)

REACH UK have concluded that:

1. For the environment there are risks that are not adequately controlled for lead shot (primary and secondary exposure), lead bullets (secondary exposure) and airgun ammunition (primary and secondary exposure)
2. Amongst consumers of high volumes of game meat that has been shot with lead ammunition (shot or bullets), there is a risk to health of vulnerable people (young children and women of child-bearing age) that is not adequately controlled.

REACH UK's proposals are:

For Live Quarry Shooting

1	Live Quarry Shooting with shot	Restriction on the placing on the market and use
2a	Live Quarry Shooting with large calibre bullets ($\geq 6.17\text{mm}$)	Restriction on the placing on the market and use
2b	Live Quarry Shooting with small calibre bullets ($< 6.17\text{mm}$)	No Action
3	Live Quarry Shooting with airgun ammunition	No Action

For Outdoor Target Shooting

4	Outdoor Target Shooting with shot	Restriction on the placing on the market and use, with a derogation for competitive athletes
5	Outdoor Target Shooting with bullets	Restriction on the placing on the market and use, with a derogation for use at certain sites
6	Outdoor Target Shooting with airgun ammunition	No Action

Transition Periods

Lead Shot – 5-year transition period

Large Calibre Bullets – 3-year transition period

All calibres of lead bullets on Outdoor ranges which do not have appropriate de-leading procedures – 2 years

Exemptions & Derogations

No restriction to placing on the market lead ammunition that is not to be fired, as supplied to museums and private collectors, for display only.

No derogation for Humane Dispatch of animals as this is considered to be part of live quarry shooting.

Derogation for athletes that are competing at, or training to compete at, the Olympic or Paralympic Games.

Derogation for use of lead bullets on outdoor shooting ranges with appropriate risk management measures.

All indoor target shooting ranges are exempt from these restrictions as they are covered under Control of Lead at Work regulations.

Also exempt from these restrictions are the police, government security services, military, technical testing and/or proofing of firearms and ammunition services, technical testing and development of other materials and products, forensic analysis, historical and other technical research or investigations.

Lead Concentrations in Restricted Ammunition

For Non-Lead Shot – concentration limit of <1% w/w lead as per existing non lead shot for use over wetlands.

For Non-Lead Bullets – concentration limit of 3% lead

These recommendations are now with Defra, the Scottish, and the Welsh government. They have twelve weeks to review the proposals and either accept them as written or request more information from the HSE. Legislation will then be drafted and presented to parliament; this is when we can really lobby individual members of parliament. How long before this makes it to the parliamentary calendar is completely unknown.

For the full proposals and background document please use the following links:

<https://www.hse.gov.uk/reach/restrictions/rr-aavi-0821.pdf>
[Background document to the Agency Opinion on the Proposal for a restriction - Lead](#)

So, what is going on in Europe with lead ammunition?

Off-Target: Billions of Euros Required to Upgrade Shooting Ranges in the EU (a Euroctiv Media article)

ECHA's opinion is still under review by the European Commission, which has not yet issued its formal legal proposal. Meanwhile, the stakeholders who shall be exposed to the restrictions proposed by the ECHA have pooled their expertise within the ESSF to fill a large knowledge gap in the ECHA's opinion.

ECHA proposed a derogation for pistol and rifle shooting ranges, allowing the continued use of lead bullets provided that specific risk management measures are in place. The use of lead bullets is logical for many shooting range users, as lead-based training/practice bullets, often used in large quantities, are significantly more economical than hunting bullets (both lead and non-lead). Nevertheless, the costs of implementing such measures at shooting ranges are significant. While the ECHA attempted to assess the wide socio-economic impact of its proposal, it concluded that *"obtaining a detailed overview of the presence of risk management measures (RMMs) already in place at shooting ranges in the EU is not possible"*.

However, the recent study commissioned by the ESSF, which stepped in to do what ECHA could not achieve by its own admission, exposes a significant underestimation of the costs of adapting shooting ranges in Europe by €4-5 billion. Thus, if the proposed lead ban were to be implemented as proposed, most of Europe's 20,000 shooting ranges would face financially prohibitive challenges to meet the conditions of the derogation.

The ESSF study, the result of a survey across 26 EU member states, Norway, **the UK**, and Lichtenstein, establishes that only a limited number of ranges currently meet the ECHA's proposed derogation conditions. With the exception of ranges in Germany, Luxembourg, and the Netherlands, less than 6% of the ranges in the rest of the EU satisfy the proposed derogation's conditions for the continued use of lead ammunition, confirming the stakeholders' serious concerns about the ECHA's proposal. Most of these ranges offer multi-discipline shooting sport options and would incur significant cumulative rebuilding costs.

Moreover, Europe's diverse climatic, geographical and infrastructural conditions do not permit the simplistic one-size-fits-all approach of the ECHA's proposal. For instance, heavy snowfall may make roofed sand traps impractical in Northern Europe, while water management systems in Southern Europe may be prohibitively expensive in regions with varying environmental conditions.

It is estimated that the total cost of upgrading works at these ranges is between €5.5 and €6.2 billion, almost six times higher than the ECHA's €1.094 billion estimate. For instance, installing a water management system on one range costs up to €100,000, while upgrading one rifle range with a sand trap may exceed €2.7 million. The wide variance between ESSF's informed estimates and those of the ECHA is not surprising. It stems from the ECHA's limited data, assumptions about existing risk management measures, and lack of consideration of the full expense of upgrading, which encompasses trap chambers or best-practice sand traps to catch bullets.

The ESSF study, which is based on data reporting across respondent countries, further reveals that the percentage of existing ranges with sufficient funds at their disposal to carry out upgrades is between nil and 5%. Apart from these issues, a ban on lead will also have adverse effects on the supply chain. This and other issues, are dealt with on Euractiv.

The REACH regulation on the use of lead ammunition on shooting ranges applies only to civilians. Military and law-enforcement personnel, which consume a far greater volume of lead ammunition, especially in the current security climate, are exempt. Consequently, they may make use of lead ammunition both on their ranges and on civilian ranges. Thus, the regulation not only fails to reach its declared objectives, but it also discriminates between users, raising further concerns.

While ECHA's proposed restrictions on lead ammunition are intended to safeguard human health and the environment, they would also generate considerable collateral implications for several sectors. The ESSF study highlights a disconnect between ECHA's expectations and the actual state of shooting ranges across the EU. The Agency appears to have considered shooting ranges in Germany as a benchmark, ignoring that this country has enjoyed at least three decades of investment in outdoor shooting ranges. It is simply unrealistic to expect other countries to reach that level within 18 months or five years, depending on bullet calibres.

The proposed measures and the imposed costs will lead to widespread closures and reduced opportunities for sport shooting, placing European sport shooters at a global competitive disadvantage, as an interview by the President of the International Shooting Sport Federation recently argued. Ultimately, ECHA's proposals would have an extensive negative impact on operators of civilian outdoor pistol and rifle ranges as well as on the millions of sport shooters and hunters who frequent them, endangering a passion-driven sport which brings invaluable benefits to society.

The European Commission must consider that alternative risk management measures exist to achieve laudable environmental and human health objectives without harming essential sectors. It has a legislative duty to ensure that the proposal is revised in the context of Better Regulation.

<https://www.euractiv.com/section/eet/opinion/off-target-billions-of-euros-required-to-upgrade-shooting-ranges-in-the-eu/>

[Report on outdoor Rifle/pistol ranges | essf \(shootingforum.eu\)](#)

Clarity on Lead Shot Ban Over Wetlands

The Firearms United Network challenged the legal basis of the REACH EU restriction on lead shot in/ over wetlands. This challenge was lost and an appeal at the Court of Justice of the EU was also lost, but not before clarifying some aspects of the restrictions. The CJEU judgement was issued on 17/10/24.

<https://curia.europa.eu/juris/document/document.jsf?text=&docid=291259&pageIndex=0&doclang=FR&mode=lst&dir=&occ=first&part=1&cid=5491043>

In practice:

1. A wetland must be **a habitat for waterfowl**. So, not just a pond or reservoir for whatever purpose, but also a normal habitat for waterfowl.
2. The 'within 100m of a wet area' is only applicable if it can be proven that the wet area is a normal habitat for waterfowl, and must be assessed on a case-by-case basis.
3. Discharging lead shot when within 100m of a wetland waterfowl habitat is prohibited, as is carrying lead shot when wetland shooting, or going wetland shooting.
4. However, if just walking through a wetland habitat with lead shot, but not discharging the shot or participating in wetland habitat shooting, is not prohibited.

This will apply to Northern Ireland as they are still under the law of the EU, and will probably be interpreted similarly in England, Wales and Scotland.

Firearms Licensing Fees

On 20/12/24 the Home Office wrote to BSSC with the following, stating they will write again when the Statutory Instrument is laid before parliament.

“Firearms licensing fees have not increased since 2015 and are now significantly less than the cost of the service provided by police forces. This funding deficit is impacting the effectiveness of police firearms licensing controls and the crucial role they play in safeguarding the public. We therefore intend to lay a statutory instrument when parliamentary time allows to increase firearms licensing fees to provide full-cost recovery for police forces, in line with our manifesto commitment. The additional revenue raised will be retained by police forces to support the important improvements needed in firearms licensing.”

The commitment to full cost recovery must follow treasury guidelines. Continuous assessment is now considered to be part of the processing of a licence; therefore, it is not simply the granting of a licence they are charging for, but the continuous assessment for the duration of the licence. This is not the end of the discussion. Before the change in government there were discussions about having 10-year certificates once the medical markers were in place. The police were on board with this proposal, and if we can get this agreed with the current government, will go some way to mitigate the increasing costs. Unfortunately, medical markers are not yet consistently applied

throughout Wales and Scotland, they are waiting to see how it works in England first. Where it is used the police are very happy with the process. A pricing structure with regular increases in cost is also in discussion.

Project Titanium

This has been a controversial project from a licence holders' perspective, as historically there have been no safeguards for licence holders/applicants against malicious complaints by ex-spouses etc. Certain police would like to expand the scope of the project from domestic abuse to anything which causes turmoil within the family. A paper on this will be put forward to the licensing lead, Home Office and BSSC in due course, with an emphasis on the project being applied consistently by all licensing authorities.

Suicides by Firearms Licence Holders

The police have been looking at suicide statistics, and those groups of people perceived to be more at risk of suicide. When discussed there had been 55 suicides in 2024 by licence holders, all of whom had been male, and 40 of which had been by firearm. Whilst the Police's concern is understandable, when the proportion of licence holders that commit, suicide is compared to the proportion of men who commit suicide in the UK, the figures are identical, and therefore that they are licence holders is co-incidental.

Fake Firearms Licences

Forged firearms certificates have been in circulation as the criminal world tries everything at their disposal to get their hands on live firearms. Both Registered firearms Dealers and Private Sellers have been caught out in this way. The National Crime Agency have launched a campaign, Project Rutic, to increase awareness. A scannable QR code on the poster links to NCA resources, offering further guidance on identifying fake firearm certificates.



“Fraudulent certificates pose a significant risk by enabling unlicensed individuals to obtain firearms,” said the NCA in their campaign release. The initiative highlights the importance of safeguarding firearm ownership against criminal exploitation.

The NCA has proposed a system similar to DVLA, MOT etc. for online verification of firearms certificates, by the licensed firearms community, to reduce the risk of lawful-unlawful firearms transfer. It is hoped this can be incorporated into whatever system replaces NFLMS.

[Home - National Crime Agency](#)

Criminal use of Firearms

Whilst criminals are still keen to source lethal firearms, and have a preference for cartridge handguns, criminal discharge of firearms continues to be lower, probably because of difficulties in supply. Police say that the use of converted blank firers has increased hence the recent closer look at the Turkish blank firers which are now prohibited. Shotgun, Handgun and Airgun offences are lower. Offences with Rifles are marginally higher, but the greatest increase in offences is with Imitation Firearms.

[Offences involving the use of weapons: data tables - Office for National Statistics](#)

Trophy Hunting

On 21/10/24 the Hunting Trophies (Import Prohibition) Bill was re-introduced to parliament as a Private Members Bill, by David Reed. The second Reading will be on 17/1/25.

Six nations, Botswana, Namibia, South Africa, Tanzania, Zambia and Zimbabwe, have written a joint letter to Defra, the Minister for International Nature, Minister for Africa and the foreign Secretary, calling for urgent talks to see if the Labour Government is going to support the Bill. In their letter they accept that those for the bill are free to express their opinions. The six nations “respectfully object to their willful disregard of their nations positions on this issue”.

Firearms 3D Printing

On 29/10/24 a Firearms 3D Printing Bill was introduced to parliament as a Private Members Bill, by Preet Kaur Gill. The second reading will be on 17/1/25.

The Bill is to create an offence of possessing a blueprint for the production of a firearm by 3D printing, and to create an offence of possessing a part of a firearm produced by 3D printing, and for connected purposes.

Whilst we understand the concern of misuse of 3D printers, the current laws are adequate for this purpose, and are proven to be effective. There have been several cases in the media where convictions for manufacturing viable firearms parts/firearms have been achieved with no problems interpreting or applying current law.

3D printers are valuable tools in the design, manufacture and repair of firearms, and many other unrelated items, for the professional and amateur hobbyist. Demonising 3D printers and drawings of firearms parts is fairly pointless unless criminal intent can be proven. Some engineering drawings are simply a piece of art to certain people, especially the older patents in sepia ink.

Knives

We have had a number of enquiries to help decipher what knives are currently lawful to possess. There is some help on [Selling, buying and carrying knives and weapons - GOV.UK](#)

But this online guide might be useful too. [UK Knife Laws Explained for the Outdoors - 2024 Version](#)