

# Regulatory Impact Statement: Supporting shooting clubs and ranges

## Coversheet

Purpose of Document	
Decision sought:	This RIS provides analysis to support Cabinet decisions on improvements to the regulation of shooting clubs and ranges.
Advising agencies:	Ministry of Justice
Proposing Ministers:	Associate Minister of Justice
Date finalised:	24 July 2024
Problem Definition	
<p>The Government has committed to firearms regulatory reform in the current Parliamentary term. The National and ACT coalition commitment to repeal and replace Part 6 of the Arms Act 1983, related to shooting clubs and ranges, informs Phase 2 of the Government’s firearms reform programme. Feedback from focused consultation is that the current regulatory framework applied to clubs and ranges is difficult to understand and aspects are unwarranted from a safety perspective, undermining confidence in the regulatory system. Continuation of the status quo may contribute to the closure of shooting clubs and ranges where the volunteers who run them are unwilling or unable to comply with the regulatory requirements, ultimately compromising the role clubs and ranges play in contributing to firearms safety.</p>	
Executive Summary	
<p>Shooting clubs (clubs) and shooting ranges (ranges) provide places for people to choose to learn how to safely operate firearms, build confidence through practise, and engage in sporting competition. There are 396 clubs in New Zealand and 1,181 ranges.</p> <p>The regulatory framework governing the operation of clubs and ranges is provided through the Arms Act 1983 (the Act) and the Arms Regulations 1992 (the Regulations). Significant amendments were made to the framework through the Arms Legislation Act 2020, in response to the terrorist attack on the Christchurch masjidain on 15 March 2019. These amendments included the introduction of purposes for the Act, emphasising safety for users and the wider public. As part of these changes, Part 6 of the Act, covering the regulation of clubs and ranges came into force in June 2022, and the related Regulations followed in December 2022.</p> <p>The National and ACT Coalition Agreement includes a commitment to amend Part 6 of the Act and the associated Regulations as part of a suite of actions focused on firearms reform. The Associate Minister of Justice (the Minister) seeks to simplify aspects of the regulatory regime with a focus on ensuring that requirements placed on clubs and ranges can be clearly justified in terms of the objectives of the Act.</p> <p>The Ministry of Justice (the Ministry) considers Part 6 of the Act and its supporting regulations contain the general features we would expect to see in a regulatory system, where there are risks to public safety associated with the regulated activity. Due to the</p>	

limited time since these requirements have been in place (approval of clubs and certification of ranges has been required since June 2023), there is little data about the efficacy of the regime in promoting public safety, or the ongoing impact of the compliance burden. Even so, the Ministry considers there may be opportunities to strengthen and streamline the regime by reducing the regulatory burden for clubs and ranges, while still ensuring measures are in place to protect individual and public safety.

Between 28 May and 21 June 2024, the Ministry undertook focused consultation with a list of stakeholders agreed by Cabinet, on a discussion document entitled *A new approach to regulating shooting clubs and ranges*.<sup>1</sup> The discussion document outlined a suite of proposals to amend the current requirements placed on:

- pistol clubs and pistol ranges;
- non-pistol clubs; and
- non-pistol ranges.

Of the feedback received, most submissions came from individuals or organisations associated with shooting clubs and ranges. These submitters were generally supportive of proposals to reduce the time and cost of compliance. We also received feedback from several individuals and organisations who were not firearms owners. Feedback from these submitters generally favoured retaining the current requirements as they considered these important to ensure individual and public safety or to retain the current requirements until there is time to assess their impact, given they have only been in place for a short time.

While New Zealand Police (Police) data on the approvals of clubs and certification of ranges suggests clubs and range operators have transitioned to meet the requirements, feedback from ranges, clubs and their members highlights that they find the requirements burdensome and have limited trust in the regime to promote safety. We consider that there may be gaps in the legislation and duplicative requirements that are not necessary to serve the public safety objective of the regime.

The proposed package of regulatory reforms seeks to maintain a focus on individuals and public safety, while reducing the compliance burden. The preferred options are summarised below:

Area	Recommended option
Pistol clubs and pistol ranges	Option 1C: Most regulatory requirements kept, reporting streamlined, changes to range inspection frequency and ammunition sales information.
Non-pistol clubs	Option 2C: Replace current approval requirement with an enrolment system, changes to ammunition sales information. It will be an offence to operate without enrolment.
Non-pistol ranges	Option 3C: Replace current approval requirement with an enrolment system. The regulator to have periodic inspection power and other compliance tools. It will be an offence to operate without enrolment.

<sup>1</sup> The list of stakeholders is attached at Appendix 1.

We have assessed options against a set of criteria endorsed by Cabinet to provide the framework for firearms regulatory reform: promotion of public safety, effective implementation, straightforward, and consistency with constitutional principles, including protecting New Zealand Bill of Rights Act 1990 (NZBORA) freedoms [SOU-24-MIN-0040].

## Limitations and Constraints on Analysis

### Narrow scope

Officials received clear commissioning from the Minister, who has an in-depth knowledge of, and experience with, shooting clubs and ranges and firearms safety, including through experience as a firearms safety instructor. The Minister shared these insights with officials in order to identify her key areas of concern with the regulatory regime and the proposals to address these. This commissioning, combined with time constraints, has limited the scope of options consulted on with stakeholders.

### Minimal evidence base and data analysis

Information supporting the problem definition has been sourced through Ministry research, information from Police (including the current regulator Te Tari Pūreke – the Firearms Safety Authority (FSA)), and engagement with representative bodies representing a range of views such as the Minister’s Arms Advisory Group (MAAG) and the Firearms Community Advisory Forum.

Police has provided data and insights from its experience as the firearms regulator. However, the current legislative requirements have been in place for approximately a year, so there is little evidence of any positive and negative impacts of the requirements. Prior to those changes, non-pistol clubs and ranges were not regulated under the Act, and pistol clubs were regulated through the Act and the Regulations, supported through a Letter of Agreement between Police and Pistol New Zealand.

We have also sourced information through feedback from stakeholders associated with clubs and ranges. This was both provided to the Minister directly and received through focused consultation with stakeholders between 28 May and 21 June 2024. We also drew on the submissions analysis undertaken during the development of proposals to inform the 2020 amendments to the Act.

### Consultation with stakeholders has been focused and time-constrained

Consultation with people who may be affected is necessary to inform any change to the Regulations.<sup>2</sup> Focused consultation with stakeholders took place between 28 May and 21 June 2024 with a Cabinet agreed list of stakeholders, who represent both firearms owners and others with varied interests including representatives from Muslim communities, human rights groups, social services, academics and the medical profession. Some stakeholders shared the discussion document with others who then provided submissions. The list of stakeholders is attached at **Appendix One**.

While the views of stakeholders representing a range of groups was sought, over 90 per cent of feedback was from licensed firearms holders, clubs and ranges, reflecting that regulated parties may be more engaged with the detail of regulatory requirements. Other representative organisations whose views were sought have broad areas of interest and

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<sup>2</sup> See section 74(4) Arms Act 1983, which requires that the Minister must be satisfied that all reasonable steps have been taken to consult persons or organisations affected, or likely to be affected, by the regulations.

may be consulted on a range of other issues at any given time, which may affect the level of feedback they provide. In addition, this was a short period for consultation on proposals involving a high level of technical detail. At least one stakeholder approached stated that they were unable to prioritise feedback on the discussion document in the time provided. Others noted in their submissions that the short consultation period affected their ability to provide detailed feedback.

### **Assumptions about the scale and significance of the problem**

We heard from most submitters associated with clubs and ranges that they have found the new requirements burdensome and that they consider Police is not the appropriate regulator. A handful of submitters provided anecdotal evidence of the closure of clubs or ranges in feedback supplied through focused consultation. However, we also understand from Police data that most clubs and ranges have complied with the new requirements. Two clubs or ranges have closed, but these closures were not due to these regulatory requirements.

Due to the anecdotal nature of what we have been told, it is difficult to assess the scale and significance of the issues experienced by clubs and ranges and the associated risk of closure. The proposals under consideration are therefore based on an assumption that the risk is of a scale that warrants regulatory change.

### **The Ministry is building its firearms policy capability**

While the Ministry's Policy Group has knowledge and experience in relation to criminal justice and the regulation of potentially harmful activities and substances more generally, we have had to build our capability in relation to the regulatory system for firearms. Responsibility for the Act and the Regulations and related policy advice shifted from Police to the Ministry in January 2024. We (aided by Police) have been working at pace to develop our knowledge of the Act and the Regulations. Our ability to prepare advice to tight timeframes has been constrained while we have been in the process of transferring knowledge and building capability.

### **Sequencing of regulatory reform**

The National and ACT Coalition Agreement prioritised the review of Part 6 ahead of wider planned reform of the Act. This has constrained our ability to explore options that would require more substantive or fundamental changes to the Act. It also carries a risk that key stakeholders are subject to multiple regulatory changes, should the wider reform of the Act result in further adjustments to the Part 6 provisions. Ultimately, the planned full-scale review of the Act will provide an opportunity for broader consultation, and to review the 'fit' of changes made to Part 6 with emerging advice.

### **Responsible Manager**

Kathy Brightwell  
General Manager, Civil & Constitutional  
Policy Group  
Ministry of Justice



24 / 07 / 2024

## Quality Assurance

Reviewing Agency:

Ministry of Justice

Panel Assessment & Comment:

The Ministry of Justice's Regulatory Impact Assessment quality assurance panel has reviewed the Regulatory Impact Statement "Supporting shooting clubs and ranges" prepared by the Ministry of Justice and considers that the information and analysis summarised in the RIS partially meets the quality assurance criteria.

Consultation was still focused significantly on one group of stakeholders and could have better incorporated the wider public interest in firearms safety. As with the interim RIS, the limitations and constraints are clearly outlined, and the analysis is balanced and supported by the analytical framework. The impacts of previous law changes are still emerging at this early stage, having only been implemented for a period of about one year. Despite the limited evidence base about the scale and significance of the regulatory regime's impacts on clubs and ranges, the case is made for improvements to some of the technical aspects of the regulatory framework. Within the constraints clearly outlined in the RIS, the analysis in the RIS can be relied on by Ministers for decision making.

## Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

### Snapshot of shooting clubs and ranges in New Zealand

1. Shooting clubs (clubs) are voluntary associations of people who act in accordance with a set of written rules and participate in, or intend to participate in, shooting activities on a regular basis. A shooting range (range) is a facility – either indoor or outdoor – used by a club or members of the public for the primary purpose of carrying out shooting activities.<sup>3</sup>
2. Clubs and ranges can have an important public safety role. They are intended to promote their particular shooting activity and offer a safe place for people to learn how to operate firearms safely, build confidence and discipline through practise, and engage in sporting competition. An example is the use of ranges for hunter education courses.<sup>4</sup>
3. New Zealand Police (Police) reports that, as of 4 July 2024, there were 396 clubs in New Zealand – 303 non-pistol clubs<sup>5</sup> and 93 pistol clubs.<sup>6</sup> Some clubs are affiliated with a national organisation, such as the National Rifle Association or the New Zealand Deerstalkers' Association.
4. There are 1,181 ranges in New Zealand, of which 407 are pistol ranges<sup>7</sup> and 774 are non-pistol ranges.<sup>8</sup> Some ranges are affiliated with clubs, while others operate independently. Approximately 20 per cent of range operators are commercial in nature.
5. Police estimates that approximately 20,000 to 40,000 individuals are affiliated to shooting clubs across the country, representing approximately 9 to 17 per cent of the 233,000 firearm licence holders in New Zealand.

### The regulatory framework provided by the Arms Act 1983 and Arms Regulations 1992

6. The firearms regulatory regime is governed by the Arms Act 1983 (the Act) and the related Arms Regulations 1992 (Regulations).

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<sup>3</sup> Arms Act 1983, section 38A.

<sup>4</sup> HUNTS courses, offered by the New Zealand Deerstalkers Association network, rely on the use of ranges for shooting activities, including a module on safe firearms handling and shooting techniques.

<sup>5</sup> 296 non-pistol clubs are approved and operating, and seven are not yet approved, but continue to operate because they existed before the legislative changes and have made an application by 24 June 2023 for approval (the date specified under transitional arrangements).

<sup>6</sup> 92 pistol clubs have been re-certified and are operating, and one pistol club is a new club that has not yet been approved. The new pistol club cannot operate until its application has been approved.

<sup>7</sup> 407 pistol ranges are certified, and one is not yet certified as it is a new pistol range, and the application has recently been made. The new pistol range cannot operate until it has been certified.

<sup>8</sup> 284 non-pistol ranges are certified and 490 have not yet been certified. Two of the non-pistol ranges that have not yet been certified cannot operate, as they are new ranges that made an application for certification after 24 June 2023.

7. Pistol clubs and ranges have historically been subject to greater regulation than non-pistol clubs and ranges. Licence holders can only be permitted to possess and use a pistol through an endorsement if they are a member of an incorporated pistol club and only use that pistol on a range certified for that specific use.
8. The rationale for these stricter requirements is that pistols can be easily concealed, so are desirable for illegal use. Pistol endorsement holders can also use semi-automatic pistols with large capacity magazines in their sporting competitions. The possession and use of pistols has therefore been more tightly regulated than other firearms. Prior to 2020, pistol clubs had to be an incorporated society and recognised by the Commissioner and their range had to be approved by the Commissioner. The standards and expectations for operating were set in a Letter of Agreement between Pistol New Zealand and Police.
9. A series of changes were made to the regulatory regime, in response to the terrorist attack on the Christchurch masjidain on 15 March 2019. This work was led by Police, as the agency responsible for the administration of the Act at the time. Much of this work pre-dated the Report of the Royal Commission of Inquiry into the terrorist attack on the Christchurch masjidain on 15 March 2019, whose recommendations focused on the firearms licensing system, rather than on clubs and ranges. The Royal Commission of Inquiry nonetheless noted that the person responsible for the attack practised their skills at a range and was a rifle club member.
10. Amendments to the Act included a new purpose statement and related principles:

Section 1A(1): The purposes of this Act are to—

  - (a) promote the safe possession and use of firearms and other weapons; and
  - (b) impose controls on the possession and use of firearms and other weapons.

Section 1A(2): The regulatory regime established by this Act to achieve those purposes reflects the following principles:

  - (a) that the possession and use of arms is a privilege; and
  - (b) that persons authorised to import, manufacture, supply, sell, possess, or use arms have a responsibility to act in the interests of personal and public safety.

### **New regulatory regime applied to clubs and ranges**

11. Changes introduced through the Arms Legislation Act 2020 included the insertion of Part 6 to the Act, covering the regulation of clubs and ranges.
12. The changes were intended to:
  - give the regulator knowledge and oversight of all clubs and ranges, including where firearms are used and stored;
  - require clubs to have formal management and governance structures in place, to better achieve safety and responsibility in the use of firearms; and
  - provide greater assurance of the safe use of ranges, for users and the general public.



13. The approach was intended to introduce consistency and formality to the regulation of clubs and ranges, many of which had been self-regulated.<sup>9</sup>

### **Requirements placed on clubs and ranges**

14. Part 6 of the Act, together with Parts 5 and 6 of the Regulations, place requirements for approval on any club that uses a range for its shooting activities,<sup>10</sup> and certification for all ranges.
15. Other aspects of the regulation draw distinctions between:
- pistol clubs and the ranges they operate;
  - non-pistol clubs;
  - non-pistol ranges; and
  - clubs on whose behalf firearms and/or ammunition are sold.
16. The legislation sets out requirements related to:
- *the status of clubs and ranges*, including the need for clubs to hold a certificate of approval and for ranges to be certified, incorporation (in some cases), and the duration of range certifications;
  - *the application process to become approved/certified*, including who may apply, how applications must be made, and what information must be provided;
  - *the criteria and conditions for approval/certification*, including rules for safe operation and facilities for secure storage;
  - *ongoing obligations on approved clubs and certified ranges*, including what information must be recorded, retained, and provided, as well as renewal of range certification and the Range Manual and safety officers on duty;
  - *ongoing obligations on clubs if ammunition and/or firearms are held by a licence-holding club member on their behalf*, including a requirement to be incorporated,<sup>11</sup> and what information must be recorded and reported; and
  - *powers for monitoring and enforcement of approved clubs and certified ranges*, including inspection, issue of improvement notices, events suspension, and criteria for cancellation of approval/certification.

### **Approval and certification fees**

17. A club's approval lasts until it is surrendered by the club or is cancelled by the Commissioner of Police (Commissioner). The application fee is \$140 and the annual fee is \$40 for clubs that sell ammunition or firearms on behalf of others and \$30 for all other clubs.

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<sup>9</sup> Pistol ranges had some oversight through a Letter of Agreement between Police and Pistol New Zealand. Non-pistol ranges had no formal oversight.

<sup>10</sup> Section 38A: shooting activities means—

- (a) activities that are carried out using a firearm or an airgun for the purpose of shooting at inanimate targets (whether fixed or moving); but
- (b) excludes: (i) paintball shooting; and (ii) airsoft shooting.

<sup>11</sup> Pistol clubs must be incorporated in any case, but non-pistol clubs in this position must also be incorporated.



18. A range's certification lasts for five years unless surrendered or cancelled by the Commissioner. A range operator must request a review of the range certification if they intend to operate the range in a way that departs from its certification conditions.
19. The range certification application fee is \$400 for a single range, and \$200 each time its certification needs to be renewed (as long as there has been no significant change to the design, construction, or operation of the range). The application fee increases to a maximum of \$625 for multiple ranges on the same site.

### **Ensuring regulatory compliance**

20. The Firearms Safety Authority (FSA) is responsible for ensuring compliance with the regulatory regime. The FSA is currently a business unit of Police. As regulator, the FSA can:
  - enter and inspect clubs and ranges;
  - issue improvement notices;
  - temporarily suspend operations on the basis of non-compliance with an improvement notice;
  - cancel the club's approval or a range's certification; and
  - ultimately bring prosecution against individuals for operating clubs and/or ranges that are not approved/certified.
21. We understand that the FSA's compliance approach involves first engaging and educating the club or range operator, and then sending escalating reminders, before improvement notices are issued, cancellations, and prosecution. However, we understand that many stakeholders and the Minister do not agree that this level of regulatory compliance action should be a Police function. Stakeholders' perception that they are being 'policed' contributes to their broader lack of confidence in the regulatory regime as it applies to clubs and ranges.<sup>12</sup>
22. The National and ACT coalition agreement directed the transfer of responsibility for firearms policy and regulation to the Ministry in January 2024. It also agreed to transfer the regulator to another department, which has not yet occurred. This transfer may also assist with trust and confidence in the regime.

### **Implementation of new requirements**

23. Part 6 of the Act came into force in June 2022, and Parts 5 and 6 of the Regulations came into force in December 2022. Since then, clubs, range operators, and Police have been working to implement the changes and adapt to the new requirements.
24. At the time when Part 6 of the Act came into force, existing pistol clubs already recognised by Police and Pistol New Zealand were automatically deemed approved, and the ranges they operated were deemed certified.<sup>13</sup>

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<sup>12</sup> This is being considered as part of Phase 3 of the Regulatory Reforms.

<sup>13</sup> Any existing ranges that were previously certified by the Commissioner for target pistol shooting under the Regulations have been treated as if they had been issued with a certificate (lasting for five years) under the new provisions. No further application was required for this to occur, and Police has contacted these range operators and issued them with a certificate to this effect. These pistol range operators will need to apply to have certification renewed again before 25 June 2027.

25. Transitional arrangements required non-pistol clubs and any new clubs to apply for approval, and non-pistol ranges, along with any new ranges, were required to apply for certification by 24 June 2023. Clubs and range operators that made applications by that date have been able to continue to operate pending a decision on their application. New clubs and ranges cannot start operating until their applications have been approved.
26. Police data suggests that many existing clubs and range operators have transitioned to meet the new regulatory requirements:
  - all clubs that made their applications are continuing to operate:
    - 93 pistol clubs have been deemed approved and continue to operate (two of which were new clubs);<sup>14</sup> and
    - 303 non-pistol clubs have been approved and continue to operate; and
  - all ranges existing at the time Part 6 of the Act came into force for which applications have been made (or were already recognised pistol ranges) are continuing to operate. There are 490 non-pistol ranges that are not yet certified (two of which are new applications that cannot operate until certified). All of the 490 existing applications have been triaged by the FSA and continue to be processed.
27. Police states that 267 improvement notices have been issued to operators for not meeting standards they should have met prior to 2020 under the Pistol New Zealand Manual. These improvements notices were issued by the FSA and were required to bring ranges up to a safe operating standard – with the number of notices issued decreasing over the transition period.

### **How the counterfactual may develop if no action is taken**

28. It is possible that the current regulatory regime may contribute to the closure of some clubs and ranges if they struggle to meet the public safety requirements placed on them. Anecdotal evidence supplied by submitters from clubs in response to consultation is that many volunteers are no longer willing to invest the time required to be on club committees, which may ultimately affect the ongoing viability of the club.
29. Several clubs have indicated that the costs involved in seeking territorial authority consents and other measures required for certification of a range has been over \$10,000. These costs have been borne, at least in part, through club members' fees. Two clubs indicated that they ceased operating ranges due to the expense of certification. However, these fees were already required prior to 2020 and were not related to the Arms Regulations.
30. Some of the costs described are one-off costs associated with the initial certification of a range and are not all directly associated with a certification application (resource management costs may remain relevant whether or not ranges are required to certify). However, these costs may contribute to make it difficult for new ranges to be certified.

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<sup>14</sup> Any pistol club that was already recognised by Police at 24 June 2022 (under the previous regime) could continue to operate without needing to apply for approval, as they were deemed approved under the new legislation.

31. The difficulties experienced in sourcing volunteers and in complying with the requirements for range certification could affect the ongoing viability of some clubs and ranges and reduce the accessibility of clubs and ranges in some regions of New Zealand. Firearms safety courses and safe hunting courses need ranges to operate. Hunters can also use ranges as safe places to sight-in their guns. The closure of clubs and ranges may therefore ultimately compromise the safety of firearms users and the wider community.

### What is the policy problem or opportunity?

32. The Minister seeks to ensure the ongoing viability of clubs and ranges as safe places to learn to operate firearms, while ensuring that there are sufficient measures in place to ensure safe operation, protecting the interests of both firearms users and those of the wider community.
33. The National and ACT Coalition Agreement includes a commitment to amend Part 6 of the Act and the associated Regulations relating to clubs and ranges. This is part of a suite of actions focused on firearms reform, culminating in a commitment to rewrite the Act, to provide for greater protection of public safety and simpler regulatory requirements to improve compliance.
34. The Ministry's view is that Part 6 of the Act and its supporting regulations contain the features we would expect to see in a regulatory system where there may be risks to public safety associated with the regulated activity. However, there may be gaps in the legislation and duplicative or unnecessary requirements, such as annual reporting requirements.
35. Where the regulatory requirements undermine trust and confidence in the regime, this could also risk leading to an unwillingness to comply. There may be opportunities to streamline the regime and reduce the regulatory burden for clubs and ranges, while still ensuring measures are in place which protect individual and public safety.

### Who is affected and how?

#### *Individuals affiliated with clubs and ranges*

36. Of the 100 submissions the Ministry received on the discussion document, 91 per cent were from licensed firearms holders, clubs, range operators, firearms sellers or umbrella organisations associated with the firearms community.<sup>15</sup> 66 submitters commented only on the proposals relating to non-pistol clubs and non-pistol ranges.
37. Feedback from these stakeholders indicated that they have struggled with the requirements established by the regulatory framework, especially those in relation to non-pistol clubs and ranges, which have traditionally not been subject to regulatory oversight by Police.
38. The majority of submitters indicated that they did not consider the regulatory requirements had made any positive contribution to safety but had added layers of time and cost for compliance. Many stated that their clubs were already operating safely,

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<sup>15</sup> Seven per cent of submissions were from individuals or organisations who were not licensed firearms holders, and two per cent were organisations that include a mix of licensed firearms holders and others.

citing lack of injuries over many years of operation. Two clubs indicated that they no longer operate a range due to the compliance burden, while two others mentioned costs in excess of \$10,000 to achieve range certification (although these costs appear to have related mainly to seeking relevant territorial authority consents).

#### *Wider New Zealand public*

39. Consultation took place with a Cabinet agreed list of stakeholders, many of whom have an interest in firearms regulation. Only nine per cent of submissions came from organisations or individuals who were either not licensed firearms holders, or who represented a mix of both licensed firearms holders and others. While the Ministry approached other groups representing varied interests, few have a particular interest in firearms regulations. A lack of response from several stakeholders approached for comment may be due to them having a broader area of focus than firearms. They may therefore be potentially consulted on a range of matters at any one time, and did not have enough time to get consider the technical details in the proposal.
40. In general, the stakeholders who did respond considered that the current regulatory requirements should remain in place. Three observed that the requirements were new, and more time is needed to measure the impact that they will have on safety. One considered that decreased regulatory oversight increases the risk of firearms misuse going undetected.
41. Stakeholders (including several licensed firearms holders) have indicated that requirements around non-pistol range certification serve an important ballistic safety purpose. Non-pistol firearms of higher calibre with longer barrels, such as rifles, can have a far greater range than pistols. 17 submitters favoured keeping some or all of the elements of the current certification system for non-pistol ranges.
42. It is likely that the public will have a range of perspectives on the potential reform of the regulations applied to clubs and ranges – particularly from a safety perspective. We expect to hear more of these through the Select Committee process.

#### *Māori interest*

43. It is not known how many members of shooting clubs or range users are Māori. The Ministry did not receive any submissions specifically relating to Māori participation in clubs or at ranges.
44. Of the submissions we received, one mentioned that access to firearms can be necessary for Māori to undertake cultural practices such as hunting and land management activities. However, the counterfactual in which club and ranges may become less viable, may not have a direct impact on this.

### **What objectives are sought in relation to the policy problem?**

45. The overarching objective for firearms regulatory reform is to deliver a system that:
  - supports the safe possession and use of firearms and other weapons for legitimate purposes (e.g. sport, hunting, collecting and pest control); and
  - imposes proportionate controls that protect individual and public safety from firearms-related harm.
46. Proposed changes to Part 6 of the Act and associated Regulations seek to restore confidence in the regime by reducing the compliance burden where compliance is not

clearly justified to assist in achieving public safety. This will in turn ensure the ongoing viability of clubs and ranges as contributors to firearm safety.

47. The Minister is committed to ensuring that the regulatory burden is justified, while maintaining a focus on measures which will assist to ensure the safety of firearms users and the general public.

# Section 2: Deciding upon an option to address the policy problem

## What criteria will be used to compare options to the status quo?

48. The following assessment criteria will be used for options assessment:

Criteria	Description
Promote public safety	<ul style="list-style-type: none"> <li>Contribute to protecting the public from firearms-related harm</li> </ul>
Effective implementation	<ul style="list-style-type: none"> <li>Provide for effective and efficient delivery of service</li> </ul>
Straightforward	<ul style="list-style-type: none"> <li>Simple and easy to understand and apply for users</li> </ul>
Consistent with constitutional principles	<ul style="list-style-type: none"> <li>Including the New Zealand Bill of Rights Act 1990 (NZBORA)</li> </ul>

49. We note that there may be tensions between some aspects of these criteria, for example, judgement around measures that are necessary to protect public safety, and perceptions about what constitutes straightforward regulation. In developing options, the Ministry has tried to balance these criteria to ensure that public safety is not compromised by streamlining regulations.

## What scope will options be considered within?

- 50. Our scope has been limited by the National and ACT Coalition Agreement to move immediately to “repeal and replace” Part 6 of the Act. Consideration has not been given to non-regulatory approaches.
- 51. In addition, the focus on Part 6 of the Act means that regulatory options that may advance the objective, but which would require broader amendments to the Act or to other regimes which the Ministry does not have policy responsibility for (such as the resource management regime), have not been considered.
- 52. We received clear commissioning from the Minister, who has an in-depth knowledge of, and experience in, shooting clubs and ranges and firearms safety. The Minister has drawn on this experience, together with feedback received from the sector, to identify ‘pain-points’ for clubs and ranges, which informed the proposals consulted on in the discussion document. These include concerns about the complexity of regulation, costly and time-consuming requirements, and a lack of clear rationale for some obligations.
- 53. Time constraints have further limited our ability to develop feasible options. Additionally, we have had to build our knowledge of firearms policy and regulation quickly, as responsibility shifted from Police to the Ministry in January 2024.
- 54. The evidence base primarily consists of feedback provided by stakeholders associated with clubs and ranges, although this has been supplemented by some feedback received from other stakeholders during consultation.

## What options are being considered?

55. Options to address three separate, but related areas within the regulation of clubs and ranges are analysed in this section. These are:

No	Area	Options
1	Regulation of pistol clubs and pistol ranges	Option 1A – status quo Option 1B – certification with modification of some regulatory requirements Option 1C – additional changes to record keeping and inspection
2	Regulation of non-pistol clubs	Option 2A – counterfactual Option 2B – enrolment system for non-pistol shooting clubs Option 2C – additional changes to record keeping requirements
3	Regulation of non-pistol ranges	Option 3A – counterfactual Option 3B – removal of non-pistol range certification Option 3C – an enrolment system for non-pistol ranges

### Area one: regulation of pistol clubs and pistol ranges

#### *Option 1A – Status quo*

56. Currently pistol clubs must have a certificate of approval to operate and must be registered as an incorporated society. There are a range of requirements placed on clubs around reporting, keeping records of firearms or ammunition sales for 10 years, storage and security. Licence holders with pistol endorsements must participate in 12 shoots per year at events organised by the pistol club they belong to.
57. Any ranges operated by a pistol club must be certified. Range certificates are subject to conditions and must be renewed every five years. The FSA can enter and inspect any shooting range, or a place where a club stores firearms or ammunition, with at least seven days' notice. It can also inspect, print, copy or remove any documents it reasonably believes belong to the shooting club or range.
58. Records maintained by the FSA demonstrate that, to date, pistol clubs and ranges have largely complied with these requirements. Two clubs have had their approval cancelled for reasons that pre-dated the current regulatory requirements, such as resource consent.

#### *Option 1B – Certification with modification of some regulatory requirements*

59. Under this option, pistol clubs and ranges would remain subject certification requirements, but certain requirements would be modified:
- Annual reporting requirements would be streamlined and include information about club members' participation in 12 shoots, rather than being reported separately;
  - Members will be able to participate in the required 12 shoots at any pistol club's organised event or competition;
  - Clubs selling ammunition would need to keep a record of the sale for five years (rather than 10), unless the ammunition is to be used on the day of sale at the club range or event; and



- d. Security and storage requirements will be modified to only apply to clubs or ranges storing guns or ammunition overnight, and pistols, pistol magazines, and pistol carbine conversion kits can only be stored overnight with the regulator's consent.
60. Certification will still be required every five years and the regulator will retain most of the same compliance tools as the status quo, except that only hard copy documents may be removed from clubs.

***Option 1C – Additional changes to record keeping and inspection (recommended option)***

61. Under this option, pistol clubs and ranges would be subject to most of the same requirements as they are under Option 1B, with additional modifications in relation to record keeping and the regulator's power of inspection.
62. Clubs that sell ammunition would only be required to keep a record of the details of a person who buys ammunition where the ammunition is not used at the club's range or organised even on the day of sale. Where ammunition is sold and taken elsewhere, clubs would need to record the details of the purchaser and keep that record for five years.
63. The powers of the regulator to inspect a range outside the inspection required for certification or re-certification would also be limited to when there is reason to suspect that circumstances have changed, affecting the safe operation of the range. This could include, for example, when the range may have been physically impacted by a severe weather event or subject to a complaint. The proposed requirement for a safety reason to justify an inspection could result in disputes with range operators who do not consider there is sufficient rationale for an inspection.

64. The regulatory requirements proposed in each of the three options for regulation of pistol clubs and pistol ranges are summarised in the table below.

Regulatory requirement	Option 1A/ status quo	Option 1B	Option 1C
Pistol clubs must be approved	Y	Y	Y
Pistol clubs must be incorporated societies	Y	Y	Y
Pistol ranges must be certified	Y	Y	Y
It is an offence to operate a club that is not approved or range that is not certified	Y	Y	Y
Security and safe storage requirements apply	At all times	Only for overnight storage if approved by the regulator	Only for overnight storage
Clubs that sell firearms / ammunition must keep records	For 10 years	For five years	For five years unless sales are all ammunition used on site on day of purchase
Comprehensive powers for monitoring and enforcement	Y	Yes, but only hard copy documents may be removed	Yes, but only hard copy documents may be removed. Range inspections between certification only if there is a safety reason to do so.
Licence holders' 12-shoots may be at any pistol club	Must be at home club only	Y	Y

## How do the options compare to the status quo?

	Option 1 – <i>Status quo</i>	Option 1B – <i>Certification with modification of some regulatory requirements</i>	Option 1C - <i>Additional changes to record keeping and inspection</i>
<b>Promote public safety</b>	0	0 The key requirements intended to advance safety in place under the status quo would remain. In particular, five-yearly certification and the same regulatory tools.	- Reducing the regulator’s ability to inspect between certifications could increase the likelihood of risks to public safety going undetected, unmanaged and not being appropriately mitigated. There is a public safety risk if ammunition is stolen when being transported between clubs.
<b>Effective implementation</b>	0	0 The implications for the effectiveness of service delivery by the regulator are not clear. Most regulatory powers are maintained.	- Reducing the regulator’s ability to inspect ranges may make it more difficult to maintain an oversight of range activities.
<b>Straightforward</b>	0	+ Streamlining of requirements around reporting and security and storage would result in administrative efficiency for pistol clubs and ranges.	++ Further streamlining record keeping requirements may further ease the administrative burden on pistol shooting clubs and ranges and decrease the likelihood of possible closure.
<b>Consistent with constitutional principles</b>	0	+ The option is not inconsistent with the rights affirmed in NZBORA. The inspection power must be exercised reasonably in accordance with section 21 (right to be secure against unreasonable search and seizure).	++ Personal information would need to be collected in fewer circumstances, further reducing the potential impact on individual privacy. Requiring a reason to suspect safety issues for inspection provides an additional safeguard inspection power to ensure reasonableness.
<b>Overall assessment</b>	0	++	++

**Key:**

- ++** much better than doing nothing/the status quo/counterfactual
- +** better than doing nothing/the status quo/counterfactual
- 0** about the same as doing nothing/the status quo/counterfactual
- worse than doing nothing/the status quo/counterfactual
- much worse than doing nothing/the status quo/counterfactual

## **Area two: regulation of non-pistol clubs**

65. Prior to the current regime, non-pistol clubs were not subject to government regulations, but many were affiliated to national parent organisations, which provided a framework for operating.

### ***Option 2A – Counterfactual***

66. Part 6 of the Act requires non-pistol clubs to be approved, provide annual reports and comply with a range of other regulatory measures. The FSA has a range of tools to encourage compliance, and may suspend a club's operations or ultimately shut it down.
67. Records maintained by the FSA demonstrate that many non-pistol clubs have transitioned to the regime and continue to operate. Feedback from focused consultation indicates that clubs find the requirements burdensome, and that this makes it difficult to find volunteers to serve on club committees. One submitter indicated that they were aware of a club that had closed rather than seek approval.
68. Maintaining the status quo carries a possibility that non-pistol clubs may struggle to operate effectively, or close, compromising the contribution that they make to firearms safety. However, we have not been able to quantify the likely scale or significance of this risk.

### ***Option 2B – enrolment system for non-pistol shooting clubs***

69. Under this option non-pistol clubs would be required to enrol, rather than be approved. The change in terms reflects the role these clubs have as community centres and in supporting public safety. It also reflects the change in the regulator's abilities, as information that must be provided to the regulator and other operating requirements would be streamlined, such as no longer having to produce an annual report. It will be an offence to operate a non-pistol club that is not enrolled.
70. Clubs would need to retain secure storage if firearms or ammunition are to be kept on the premises overnight, and if firearms or ammunition are to be sold on the club's behalf it would be required to be an incorporated society and to keep records of all sales for five years. The regulator would retain some powers to inspect premises and documents.

### ***Option 2C – additional changes to record keeping requirements and some additional regulatory tools retained (recommended option)***

71. This option would be largely the same as option 2B, but with two changes.
72. Clubs that sell ammunition would only be required to be incorporated and to keep a record of the details of a person who buys ammunition where the ammunition is not used at the club's range or organised even on the day of sale. Where ammunition is sold and taken elsewhere, clubs would need to be incorporated and record the details of the purchaser and keep that record for five years.
73. The regulator would retain a greater range of compliance tools, including the ability to issue improvement notices for non-enrolment. This would ensure that it could take action prior to charging a club with an offence for non-enrolment.

74. The regulatory requirements proposed in each of the three options for regulation of non-pistol clubs are summarised in the table below.

<b>Regulatory requirement</b>	<b>Option 2A/ status quo</b>	<b>Option 2B</b>	<b>Option 2C</b>
Non-pistol clubs must be approved	Y	Replaced with enrolment	Replaced with enrolment
It is an offence to operate a club that is not approved	Y	Now refers to enrolment	Now refers to enrolment
Security and safe storage requirements apply	At all times	Only for overnight storage	Only for overnight storage
Non-pistol clubs must provide an annual report to the regulator	Y	N	N
Clubs that sell firearms / ammunition must be incorporated societies	Y	Y	Unless sales are all ammunition used on site on day of purchase
Clubs that sell firearms / ammunition must keep records	For 10 years	For five years	For five years unless sales are all ammunition used on site on day of purchase
Comprehensive powers for monitoring and enforcement	Y	Inspection and ability to remove hard copy documents. No ability to issue improvement notice, suspend or cancel operations	Yes, but only hard copy documents may be removed. Ability to issue improvement notices for clubs that have not enrolled.

## How do the options compare to the status quo?

	Option 2A – Counterfactual	Option 2B – enrolment system for non-pistol shooting clubs	Option 2C - additional changes to record keeping requirements and some additional regulatory tools retained
<b>Promote public safety</b>	0	- The regulator would still be informed of the existence of non-pistol clubs and certain information associated with their operations, but some measures intended to improve public safety are removed. This may assist clubs to stay in operation, maintaining the assumed public safety benefit of clubs. However, the scale of the risk of closure is unclear as many clubs have already gone through the certification process.	
<b>Effective implementation</b>	0	- Some regulatory powers are maintained, but no compliance tools other than an offence. This may affect the regulator’s ability to assist clubs to comply other than through use of the offence.	0 Retention of more regulatory powers will assist in effective service delivery for the regulator. However, the impact on service delivery in comparison to the status quo is unclear.
<b>Straightforward</b>	0	+ Maintaining an enrolment system would support the overarching objective for firearms regulatory reform by ensuring the regulator has information about and powers in relation to non-pistol shooting clubs. The reduction of information and reporting requirements will make compliance more straightforward. Many clubs and licensed firearms holders consider the streamlined requirements of the enrolment process will achieve the safe possession and use of firearms and the public safety objective.	+ Changing requirements relating to ammunition may further ease the administrative burden on non-pistol shooting clubs. However, it will also create a two-tiered system for ammunition sales, which may be harder to understand. Overall, the reduction of information and reporting requirements will make compliance more straightforward. Many clubs and licensed firearms holders consider the streamlined requirements of the enrolment process will achieve the safe possession and use of firearms and the public safety objective.
<b>Protect individual freedoms</b>	0	+ Personal information collected would be retained for less time, reducing the potential impact on individual privacy. The option is not inconsistent with the rights affirmed in the New Zealand Bill of Rights Act 1990.	++ Personal information would need to be collected in fewer circumstances, further reducing the potential impact on individual privacy. The option is not inconsistent with the rights affirmed in the New Zealand Bill of Rights Act 1990.
<b>Overall assessment</b>	0	0	++



**Key:**

- ++** much better than doing nothing/the status quo/counterfactual
- +** better than doing nothing/the status quo/counterfactual
- 0** about the same as doing nothing/the status quo/counterfactual
- worse than doing nothing/the status quo/counterfactual
- much worse than doing nothing/the status quo/counterfactual

## Area three: regulation of non-pistol ranges

### *Option 3A – Counterfactual*

75. Part 6 of the Act requires non-pistol ranges to be certified to operate. Standards and expectations for operating are set out in the Act and Regulations. The FSA has a range of tools for monitoring and enforcement. For example, the FSA may issue improvement notices, temporarily suspend a range's operations or ultimately cancel its certification.
76. Non-pistol ranges did not need to be certified prior to June 2023. 284 are now certified and a further 490 have applied for certification. Feedback received from firearms users indicates that many find the requirements burdensome. We are aware of two clubs that they have ceased to operate a range, but their closure was not due to the firearm regulatory requirements. Many considered that the requirements do not add anything to the safe operation of ranges.
77. Maintaining the status quo carries a possibility that non-pistol ranges may struggle to operate, or ultimately close. It may also be difficult for new ranges to open. This would compromise the contribution that they make to firearm safety. However, we have not been able to quantify the likely scale or significance of this risk.

### *Option 3B – removal of non-pistol range certification*

78. Under this option non-pistol ranges would not need to be certified but would be self-regulated. Non-pistol ranges would need to comply with Range Standing Orders (RSOs) approved by a governing organisation or parent body, or by the regulator (where the range is non-affiliated).
79. If firearms or ammunition are stored overnight, there will be security and storage requirements. A range operator would still need to keep records of safety incidents that did not result in injury for at least five years.
80. There would be limited compliance tools for the regulator, and there would be no offence associated with operating a non-pistol range.

### *Option 3C – an enrolment system for non-pistol ranges (recommended option)*

81. This option would allow ranges to operate under RSOs approved by a governing body or by the regulator, but it would also require non-pistol ranges to enrol with the regulator and provide certain information about location, shooting discipline, and other matters. This would ensure awareness of the number and type of ranges operating.
82. The regulator would have some powers for monitoring and enforcement to ensure a range is operating safely including periodic inspections, improvement notices, temporary suspension of operation and ultimately cancellation of enrolment. It would be an offence to operate a non-pistol range that is not enrolled.
83. To minimise the burden on those who host a one-day shooting event on a farm, the event organiser will only need to notify the FSA of the specific event. There would be no application requirement or fee required provided the landowner does not operate more than one shooting event in a year.

84. The regulatory requirements proposed in each of the three options for regulation of non-pistol ranges are summarised in the table below.

<b>Regulatory requirement</b>	<b>Option 3A/ status quo</b>	<b>Option 3B</b>	<b>Option 3C</b>
Non-pistol ranges must be certified	Y	N	Replaced with enrolment
It is an offence to operate a range without approval	Y	N	Now refers to enrolment
Security and safe storage requirements apply	At all times	Only for overnight storage	Only for overnight storage
Non-pistol ranges must comply with RSOs approved by a governing body or the regulator	Set by regulator	Y	Y
Comprehensive powers for monitoring and enforcement	Y	Limited monitoring or compliance tools	Periodic inspection for safety purposes. Compliance tools include improvement notice, suspension and cancellation
One-off event	Requires certification at all times (with a lower fee)	N	FSA must be notified of one-off events but enrolment is not required

## How do the options compare to the status quo?

	<b>Option 3A – Counterfactual</b>	<b>Option 3B – remove certification for non-pistol ranges</b>	<b>Option 3C – an enrolment system for non-pistol ranges</b>
<b>Promote public safety</b>	0	<p style="text-align: center;">-</p> <p>While ranges can operate safely in accordance with RSOs, the FSA would have limited oversight of the RSOs and non-pistol ranges. The FSA would not have powers to intervene to improve safety if there are unsafe practices occurring.</p> <p>Removing certification could assist ranges to stay in operation and prevent some barriers to new ranges. This would maintain the assumed public safety benefit of non-pistol ranges. However, the scale of the risk of closure is unclear.</p>	<p style="text-align: center;">-</p> <p>The regulator would have some information about the location and types of ranges operating in New Zealand but would not have an approval role. It would have compliance tools to intervene where ranges are not compliant with RSOs, which would assist in maintaining public safety.</p> <p>Replacing certification with an enrolment system could assist ranges to stay in operation and prevent some barriers to new ranges maintaining the assumed public safety benefit of non-pistol ranges. However other barriers (for example resource management requirements) may remain.</p> <p>There will be no compliance tools to intervene for one-off events which could impact on public safety.</p>
<b>Effective implementation</b>	0	<p style="text-align: center;">--</p> <p>Few regulatory powers are maintained, and it is possible a range could operate without the regulator being aware of it. Even if the regulator is aware, it would not have compliance tools to address unsafe practises. This option would result in gaps in regulatory oversight.</p>	<p style="text-align: center;">+</p> <p>Retention of more regulatory powers will enable effective service delivery for the regulator. The inability to inspect a range prior to operation could impact regulator's ability to deliver on safety objectives, although the impact on service delivery is unclear at this stage.</p>
<b>Straightforward</b>	0	<p style="text-align: center;">0</p> <p>The streamlining of requirements would result in administrative efficiency for non-pistol ranges. Many clubs have indicated that they consider compliance with RSOs from a parent body to be a proportionate response to ensure safety.</p> <p>The existing requirements of certification are designed to ensure regulatory oversight of matters like ballistic safety.</p>	<p style="text-align: center;">+</p> <p>Allowing enrolment of ranges with more limited information than required under the counterfactual may ease the administrative burden on non-pistol shooting range operators.</p> <p>Would still ensure that the regulator has some information and compliance tools necessary to achieve the safety objective.</p>

	<b>Option 3A – Counterfactual</b>	<b>Option 3B – remove certification for non-pistol ranges</b>	<b>Option 3C – an enrolment system for non-pistol ranges</b>
<b>Protect individual freedoms</b>	0	0 The option is not inconsistent with the rights affirmed in the New Zealand Bill of Rights Act 1990.	0 Information requirements placed on range operators would serve an important purpose and would therefore be a reasonable limit on freedom of expression. The regulator would have an inspection power, which would need to be exercised consistently with the right to be secure against unreasonable search and seizure. The proposed offence would be a strict liability offence. This would be a justifiable limit on the privilege against self-incrimination, as a range operator would be in the best position to explain their apparent failure to comply.
<b>Overall assessment</b>	0	--	0

<b>Key:</b>	
++	much better than doing nothing/the status quo/counterfactual
+	better than doing nothing/the status quo/counterfactual
0	about the same as doing nothing/the status quo/counterfactual
-	worse than doing nothing/the status quo/counterfactual
--	much worse than doing nothing/the status quo/counterfactual

## What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

### *Area 1 – regulation of pistol clubs and pistol ranges*

85. The Ministry's preferred approach is Option 1C, which retains certification for pistol clubs and ranges, streamlines certain regulatory requirements and makes changes to the regulator's power of inspection. This option would continue to meet the objective of delivering a system that supports safe possession and use of firearms and imposes controls that protect individual and public safety from firearms related harm.
86. Aspects of the compliance burden for pistol clubs and pistol ranges would be reduced, including by streamlining reporting and record-keeping requirements, and reducing the frequency of inspections by ensuring they occur when there is a safety reason. While some ammunition sales would not be recorded under this option, this would only be for sales where the ammunition is to be used on the day of sale at the club range or event. We understand that the rationale for recording ammunition sales relates to being able to identify stockpiling, and to trace the origin of illicit firearms. Where ammunition is sold for immediate use at a certified range, there is no clear need to record and store the personal information of the purchaser.
87. While Options 1B and 1C received the same rating when assessed against the criteria, the Ministry recommends Option 1C. Feedback from consultation with stakeholders and the Minister indicated that many affected parties considered Option 1C to be more straightforward. It also provides the best balance between public safety while reducing the administrative burdens on the volunteers that operate shooting clubs. The Ministry considers this approach offers a proportionate response, and it will enable clubs to continue operating and providing spaces where people can safely learn, practice and compete.

### *Area 2 – regulation of non-pistol shooting clubs*

88. The Ministry's preferred option is Option 2C. An enrolment system would reduce the administrative burden for volunteer run clubs, while still providing the regulator with information about the existence of these clubs and some inspection and compliance powers that would support the public safety and firearms safety objectives. As with option 1C, some ammunition sales would not be recorded. However, where ammunition is sold for immediate use at a club event or range, record keeping would not clearly serve a safety objective or identify stockpiling.

### *Area 3 – regulation of non-pistol ranges*

89. The Ministry's preferred option is Option 3C – an enrolment system for non-pistol ranges. This option is preferred to option 3B as it will ensure the regulator has certain minimum information about ranges operating within New Zealand and retains a range of compliance tools to intervene where a range may be operating unsafely. It is also preferred over the status quo because it would reduce the regulatory burden on non-pistol ranges and those who hold one-time events. It would also still assist to maintain some mechanisms to support the safe possession and use of firearms and impose some controls that protect individual and public safety from firearms related harm.

## What are the marginal costs and benefits of the option?

90. The below table is a costs and benefits analysis of the preferred package of options for regulating clubs and ranges.

Affected groups	Comment	Impact	Evidence Certainty
<b>Additional costs of the preferred option compared to taking no action</b>			
<i>Pistol clubs and ranges</i>	Additional costs are unlikely. Many of the existing features remain in place.	Low	Low
<i>Non-pistol clubs and ranges</i>	Potential reduction in safety outcomes for those using clubs and ranges as some measures intended to improve safety and oversight are removed. Certainty is limited by unknown scale/scope of the problem definition.	Low	Low
<i>FSA / Police</i>	Loss of some mechanisms that assist the regulator to maintain oversight of clubs and ranges may result in a need for alternate (potentially costly) monitoring/enforcement mechanisms. Current requirements have been in place for a limited time so the standard costs to the regulator are not yet clear.	Monetisable (unquantified)	Low
<i>Wider community / general public</i>	Potential reduction in safety outcomes as several measures intended to improve safety are removed/replaced. Certainty is limited as it is unknown how far existing measures have increased public safety.	Low	Low
<b>Total monetised costs</b>		N/A	N/A
<b>Non-monetised costs</b>		Low	Low



Affected groups	Comment	Impact	Evidence Certainty
<b>Additional benefits of the preferred option compared to taking no action</b>			
<i>Pistol clubs and ranges</i>	<p>May result in lower costs for clubs and ranges, including on the time of volunteers.</p> <p>Supported by submissions from pistol clubs and their members.</p>	Low	Medium
<i>Non-pistol clubs and ranges</i>	<p>Enrolment would result in savings on current fees. May also result in lower costs for clubs, including on the time of volunteers.</p> <p>Low certainty as some costs are associated with requirements of other regulatory regimes such as the Resource Management Act 1993.</p>	<p>Fees for club approval are: \$140 initially, then \$30-40 depending on whether a club sells ammunition.</p> <p>Range certification is: \$400 (or up to \$625 for multiple ranges).</p>	Low
<i>FSA / Police</i>	<p>May be some cost-saving for the regulator because of reduced monitoring requirements (for example annual reports).</p> <p>Current requirements have been in place for a limited time so the standard costs to the regulator are not yet clear.</p>	Monetisable (unquantified)	
<i>Wider community / general public</i>	<p>May assist some clubs to remain in operation, maintaining the assumed public safety benefits that shooting clubs contribute to. However, scale of the risk of closure and resultant impacts on safety are unknown.</p> <p>Would maintain certain safety requirements for ranges and could contribute to public safety.</p>	Low	Low
<b>Total monetised benefits</b>		Initial \$140, then \$30-40 per year per club ongoing and up to \$625 every 5 years for range operators.	Low
<b>Non-monetised benefits</b>		Low	Low

## Section 3: Delivering an option

### How will the new arrangements be implemented?

91. We have analysed the Ministry of Justice's preferred package of options for the regulation of shooting clubs and ranges:
  - a. Certification for pistol clubs and ranges with streamlined requirements including changes to record keeping and inspection;
  - b. An enrolment system for shooting clubs with additional changes to record keeping requirements; and
  - c. An enrolment system for non-pistol ranges.
92. Changes to the regulations of shooting clubs and ranges will be given effect by a Bill amending Part 6 of the Arms Act, and Regulations amending the Arms Regulations. The regime will come into effect once the Bill and Order in Council come into force. The Bill is expected to pass by the end of 2024.
93. New requirements will be implemented by the regulator, currently FSA, which is a business unit within Police. This will, at a minimum, involve changes to forms, including the creation of new enrolment forms to replace existing application forms, the FSA website, internal and external guidance. We understand that further implementation planning will be undertaken during the parliamentary process.

### How will the new arrangements be monitored, evaluated, and reviewed?

94. The regulator will maintain tools to inspect clubs and ranges and may identify how the new arrangements are being complied with and their effect on individual and public safety.
95. Officials will also be able to consider the fit of the package of Part 6 proposals in the context of the planned wider review of the firearms regulatory regime. This wider review will also provide further opportunities for stakeholder and public feedback, which may assist further understanding of how the changes to Part 6 of the Act are working in practice.

## Appendix One: List of Stakeholders Consulted

Stakeholder Group	Members (individuals or organisation representatives)
<b>Minister's Arms Advisory Group</b> <i>A statutory group that advise the Minister on matters that contribute to achieving the object of the Act, in particular, the safe use and control of firearms.</i>	Don Hammond (Chair)
	Rehanna Ali
	Michael Dowling
	Professor Alexander Gillespie
	Deborah Lamb
	Helene Leaf
	Dr Catherine Stephenson
	Shayne Walker
	Philippa Yasbek (Deputy Chair)
<b>Arms Engagement Group (AEG)</b> <i>A group made up of nominated representatives for medical professionals, community law, the Muslim community, academia, Gun Control NZ, and family harm prevention groups.</i>	Family Violence Death Review Committee
	Federation of the Islamic Associations of New Zealand
	Gun Control New Zealand
	Independent Research Solutions
	Peace Movement Aotearoa
	Royal Australian and New Zealand College of Psychiatrists
	Royal New Zealand College of General Practitioners
	University of Otago (Health)
	Women's Refuge New Zealand
<b>Firearms Community Advisory Forum (FCAF)</b> <i>An advisory body consisting of nominated representatives of firearms user groups.</i>	Council of Licensed Firearms Owners
	Federated Farmers of New Zealand
	Firearms Safety Council of Aotearoa New Zealand
	Handloaders Association
	Hunting and Fishing New Zealand
	JPB Furley Limited
	Mountain Safety Council
	National Rifle Association of New Zealand
	New Zealand Antique and Historical Arms Association
	New Zealand Clay Target Association
	New Zealand Deer Stalkers' Association
	New Zealand Game Animal Council
	New Zealand Professional Hunting Guides Association
	New Zealand Service Rifle Association
	Pistol New Zealand
	Rod & Rifle Magazine
	Rural Women New Zealand
	Target Shooting New Zealand
	Whakatūpato Programme

Stakeholder Group	Members (individuals or organisation representatives)
<p><b>Clubs and Ranges Engagement Group</b>  <i>A group established in 2020 with members nominated by FCAF. This group was involved in consultation on the clubs and ranges regulations, the shooting range manual, and the development of the range inspectors' training course.</i></p>	<p>Council of Licensed Firearms Owners</p> <p>Firearms Safety Council of Aotearoa New Zealand</p> <p>Field Shooters</p> <p>Gillice Practical Rifle Events</p> <p>New Zealand Clay Target Association</p> <p>New Zealand Deer Stalkers' Association</p> <p>New Zealand Game Animal Council</p> <p>New Zealand Professional Hunting Guides Association</p> <p>National Rifle Association of New Zealand</p> <p>Pistol New Zealand</p> <p>Target Shooting New Zealand</p>
<p><b>Recreational Firearms User Safety Working Group</b>  <i>A group that works on individual and joint firearms safety initiatives and activities to contribute to improved safety outcomes by firearms users.</i></p>	<p>Fish and Game New Zealand</p> <p>Department of Conservation</p> <p>Mountain Safety Council</p> <p>New Zealand Deer Stalkers' Association</p> <p>New Zealand Game Animal Council</p>
<p><b>Dealers' Reference Group</b>  <i>Established in 2023, including references from a range of businesses (gunsmiths, auctioneers, gun show organisers and retail). The group works collaboratively with the Firearms Safety Authority to develop technology, processes, training and communications to support the implementation of the Firearms Registry.</i></p>	
<p><b>Muslim Reference Group</b>  <i>Established in 2020 as part of Police's response to the report of the Royal Commission of Inquiry into the Terrorist Attack on Christchurch Masjidain on 15 March 2019. The Firearms Safety Authority engage with this group on matters relating to the report's recommendations.</i></p>	
<p><b>Firearms User Group</b>  <i>Established in 2022 consisting of FCAF members and other firearms community members. This group has been involved in developing the Arms Information System with online forms, the Firearms Registry, and other processes and systems.</i></p>	