

Impact Assessment, The Home Office

Title: Air weapon access by those under-18 years of age

IA No: HO0349

RPC Reference No: N/A

Other departments or agencies: N/A

Date: 6 August 2020

Stage: Consultation

Intervention: Domestic

Measure: Primary legislation

Enquiries: Serious Violence Unit
public.enquiries@homeoffice.gsi.gov.uk

RPC Opinion: Not Applicable

Business Impact Target: Non qualifying provision

Cost of Preferred (or more likely) Option (in 2019 prices)

Net Present Social Value NPSV (£m)		Business Net Present Value BNPV (£m)		Net cost to business per year EANDCB (£m)	
-£6.6		£0.0		£0.0	

What is the problem under consideration? Why is government intervention necessary?

The Home Office announced a review of the regulation of air weapons in England and Wales in October 2017, following a Coroner's recommendation as a consequence of an accidental death involving an air weapon. The Firearms Act 1968 provides an exception which allows unsupervised possession of air weapons by 14-17 year olds on private premises with consent, which creates a risk that air weapons are misused by those under 18 years of age.

What are the policy objectives and the intended effects?

The objectives are to limit the harm caused by air weapons, particularly fatal incidents involving young people, by strengthening and clarifying the regulations restricting access to air weapons by those under 18 years of age. The Government is consulting on proposals to remove the exemption that allows unsupervised possession by 14-17 year olds on private premises with consent and requiring that when children are on the premises, air weapons must be locked away.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Option 0 – Do nothing and continue without strengthening air weapons regulations.

Option 1 – Introduce measures to strengthen air weapons regulations.

Main assumptions/sensitivities and economic/analytical risks

Discount rate (%)

3.5

There is significant uncertainty over the proportion of air weapon owners who do not possess lockable storage. If this proportion is higher than assumed the total costs of the policy will increase. It is assumed within family farms that adult members will take over roles that require air weapons or supervise 14-17 year olds who previously performed such tasks, such as pest control.

Will the policy be reviewed? It will be reviewed. If applicable, set review date: 10/2025

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:



Date:

4 August 2020
300920

Summary: Analysis & Evidence

Policy Option 1

Description:

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2019	PV Base	2019	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-3.3	High:	-9.9	Best:	-6.6	Best BNPV	0.0	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	3.04	0.3	3.3	0.03	0.0
High	9.11	0.8	9.9	0.09	0.0
Best Estimate	6.07	0.5	6.6	0.06	0.0

Description and scale of key monetised costs by 'main affected groups'

There will be costs to air weapons owners who will need to purchase a padlock or equivalent, in order to lock their air weapon away. This is a one-off cost of £6 million for current owners of air weapons, and an annual cost of £0.06 million for new air weapons owners in the future. There are also one-off familiarisation costs of £0.07 million. All of these costs fall to private households.

Other key non-monetised costs by 'main affected groups'

There may be inconvenience caused to 14-17 year olds who currently use air weapons. Supervision would need to be provided by a person over 21 years of age and 14-17 year olds would no longer be able to use them on private premises without supervision. Police forces may experience costs from enforcing the new regulations but it was not possible to quantify these.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low					
High					
Best Estimate					

Description and scale of key monetised benefits by 'main affected groups'

None

Other key non-monetised benefits by 'main affected groups'

It is expected that benefits to public safety will accrue, by reducing the number of air weapon incidents involving those who are under 18 years of age.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:									
Cost, £m	0.0	Benefit, £m	0.0	Net, £m	0.0				
Score for Business Impact Target (qualifying provisions only) £m:					0.0				
Is this measure likely to impact on trade and investment?					N				
Are any of these organisations in scope?		Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)				Traded:	N/A	Non-Traded:	N/A		

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 2)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	Y
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Evidence Base (for summary sheets)

A. Strategic Overview

A.1 Background

1. Air weapons are guns that expel projectiles with compressed gas (usually air) rather than with an explosion. With the exception of airsoft guns¹, air guns capable of muzzle energy of one joule or more are classified as “*lethal barrelled weapons*” and regulated by firearms legislation, in particular, the Firearms Act 1968².
2. Air rifles capable of muzzle energy exceeding 12 foot pounds (about 16.3 joules) are classified as “*specially dangerous*” and it is an offence to possess one without a firearm certificate issued by the police. Certificates will be subject to conditions including, in particular, that the weapon is stored securely. Air pistols capable of muzzle energy of 6 foot pounds (about 8.2 joules) are prohibited weapons – it is an offence to possess one without the authority of the Home Secretary.
3. The Home Office announced a review of the regulation of air weapons in England and Wales in October 2017. This followed a recommendation from the Suffolk coroner in his report into the death of a 13 year old boy, who was accidentally shot with an air rifle in 2016. The Coroner requested that the Government review the regulation of air weapons so that steps may be taken to prevent similar tragedies occurring in the future. The review considered air weapons that are classified as lethal barrelled weapons but not specially dangerous or prohibited. These air weapons can be lawfully held without a certificate in England and Wales. In Scotland and Northern Ireland, responsibility for policy on air weapons is devolved and licensing systems are in place.
4. Although low powered air weapons (that is, in the case of an air rifle below 12 foot pounds and in the case of an air pistol below 6 foot pounds) are not subject to licensing in England and Wales, their sale, possession and use are regulated. Restrictions on access and possession by those aged under 18 years of age include:
 - It is an offence to sell or let on hire firearms and ammunition, including air weapons and their ammunition, to those under 18 years of age.
 - It is an offence for a person under the age of 18 years to purchase or hire an air weapon or ammunition for an air weapon.
 - It is an offence to gift an air weapon or ammunition to a person under the age of 18 years.
 - It is an offence, under section 24ZA of the 1968 Act, for a person in possession of an air weapon to fail to take reasonable precautions to prevent an unauthorised person under 18 years of age gaining access to it. The offence does not apply where by virtue of section 23 of the Act (see below) the person under the age of 18 years is not prohibited from having the weapon with him.
 - Under section 22(4) of the 1968 Act, it is an offence for anyone under the age of 18 years to have with them an air weapon or ammunition for an air weapon. Section 23 provides three exceptions to this rule –
 - Section 23(1) - they are under the supervision of a person aged 21 years or over.
 - Section 23(2) - they are shooting as a member of an approved target shooting club or a shooting gallery and the only firearms being used are either air weapons or miniature rifles not exceeding .23 inch calibre.
 - Section 23(3) - the person is 14 years old or above and is on private premises with the consent of the occupier.

¹ As set out in section 57A of the Firearms Act 1968, airsoft guns are guns that are designed to fire only small plastic pellets and are not capable of muzzle energy above 2.5 joules or, in the case of self-loading airsoft guns, 1.3 joules. The Firearms Act 1968 is available at the following link: <http://www.legislation.gov.uk/ukpga/1968/27>

² Section 57 of the Firearms Act 1968 sets out the definition of a “lethal barrelled weapon”.

5. Under section 24ZA of the 1968 Act, it is an offence for a person in possession of an air weapon to fail to take reasonable precautions to prevent an unauthorised person under 18 years of age gaining access to it. The precautions that would be reasonable in different circumstances are not defined.
6. The consultation proposes two amendments to the legislation:
 - To clarify and strengthen 24ZA by specifying that “reasonable precautions” must include locking air weapons away when those under 18 years of age are on the premises.
 - To remove the exception under 23(3) that permits unsupervised possession by those under 18 years of age on private premises with permission.
7. As well as preventing those under 18 years of age from having unsupervised possession of air weapons, the abolition of section 23(3) will strengthen section 24ZA by ensuring that the owners must seek to prevent all unsupervised individuals under 18 years of age from possessing the air weapon.
8. The Government is consulting on potential changes to legislation to:
 - a) Strengthen and clarify the “*reasonable precautions*” that must be taken under section 24ZA so that when children are on the premises, these precautions must include locking the air weapons away.
 - b) Remove the exception under section 23(3) that permits unsupervised possession by those under 18 years of age in certain circumstances.
9. Additionally, the Government proposes to work with industry to improve the safe keeping and handling of air weapons. This includes seeking to ensure that home security devices such as security cords are supplied with all new air weapons, to help minimise the risk of misuse; and to ensure that dealers explain the importance of secure handling and storage to purchasers of new air weapons in person at the point of sale, particularly in relation to access by those under 18 years of age. It should be noted that online sales of air weapons (made by way of trade or business) must still have the transfer of possession made face-to-face.
10. There are no official statistics on fatal incidents involving air weapons. However, from open source research of internet reports, 25 deaths have been identified as caused by air weapon shootings in Britain since 2005³. These figures include accidental deaths, suicides and homicides. Of the 25 victims, 12 of them were aged under 18 years of age. In nine of the 12 incidents that resulted in the deaths of an individual under 18 years of age, it appears that the person holding the gun was also under 18 years of age (this includes one case of a deliberately self-inflicted injury). Unauthorised access to the firearms appears to have played a role in six of the deaths. It is not known in every case whether supervising adults (21 years of age or older) were present, but it appears that these cases generally involved unsupervised possession.
11. In the year to March 2019, there were 3,028 air weapon offences recorded by the police in England and Wales, 50 per cent fewer than a decade previously (2008/09) and a 78 per cent reduction since 2002/03⁴. In the year to March 2019, air weapons were used in around 32 per cent of offences involving firearms. Air weapons are rarely used in serious offences – almost two thirds (64%) of offences involving air weapons are criminal damage.
12. In the year ending March 2019, the police recorded two fatal injuries, 27 serious injuries, and 309 slight injuries in offences involving air weapons. This is similar to the previous year where the police recorded one fatal injury, 27 serious injuries and 262 slight injuries. The number of injuries from offences involving air weapons has fallen substantially from a decade ago (2008/09), when there were no fatal injuries, 72 serious injuries and 621 slight injuries.
13. Younger people are disproportionately more likely to be victims of firearms crimes than the general population. Those aged 10-24 years of age account for 39 per cent of all victims of air weapon crime, despite accounting for only 18 per cent of the population.

³ These figures exclude a small number of homicides in which the victim died after being subjected to multiple forms of violence and the air weapon injury appears unlikely to have been the cause of death.

⁴ Office for National Statistics - [The nature of violent crime in England and Wales: Year to March 2019](#)

A.2 Groups Affected

14. Those who use air weapons in competitive and informal target shooting will be affected, including those who use air pistols and air rifles in the Summer Olympics and Paralympics events.
15. Those who use air weapons in pest control (particularly in situations where the use of combustible ammunition would not be appropriate), for example in agriculture, will also be affected.
16. It is not known how many people own air weapons or how many weapons are in circulation. The Gun Trade Association (GTA) has estimated, based on sales, that there are around 4 million air weapon owners in England and Wales, in possession of around 7 million air weapons. The proposed policies affect owners of air weapons who have children on the premises, and children aged between 14 and 17 years of age who carry out unsupervised air weapon shooting.
17. The police and the criminal justice system (CJS) will be affected as they will be required to enforce the new regulations.
18. The general public will be affected, if the policy leads to an improvement in public safety.

A.3 Consultation

Public Consultation

19. As part of its review of air weapons legislation, the Home Office wrote to interested parties including the police, shooting organisations, the families of victims and their MPs, and the charities Cats Protection and the RSPCA in December 2017 and invited views on important issues including: access to air weapons by children and young persons, secure storage and safe-keeping, manufacturing standards and the post-sale modification of air weapons to increase power levels, and whether there would be merit in introducing a licensing regime for air weapons. In addition to responses from interested parties, the Government received more than 50,000 responses from members of the public.
20. The Government is now conducting a public consultation on the resulting proposals as part of the wider consultation on firearms safety.

B. Rationale for intervention

21. The Home Office announced a review of the regulation of air weapons in England and Wales in October 2017, following a Coroner's recommendation into an accidental death involving an air weapon. The Firearms Act 1968 provides an exception which allows unsupervised possession of air weapons by 14-17 year olds on private premises with consent, which creates a risk that air weapons are misused by those under 18 years of age.

C. Policy objective

22. The objective is to improve public safety by reducing the number of harms (accidental and non-accidental) from the misuse of air weapons. This may be achieved by strengthening restrictions on access to air weapons among those aged under 18 years of age, given that the misuse of air weapons appears to occur disproportionately when young people are in possession.
23. Younger people are disproportionately more likely to be victims of firearms crimes than the general population. Those aged 10-24 years of age account for 39 per cent of all victims of air weapon crime, despite accounting for only 18 per cent of the population.

D. Description of options considered

24. **Option 0** – Make no changes, and continue with the current legislation on access to air weapons by those aged under 18 years of age.
25. **Option 1** – Strengthen the restrictions on access to air weapons for those under 18 years of age by: a) clarifying the “*reasonable precautions*” that must be taken under section 24ZA so that when children are on the premises, these precautions must include locking the air weapons away b) Removing the exception under section 23(3) that permits unsupervised possession by those under 18 years of age in certain circumstances.
- a) Clarifying the ‘reasonable precautions’ that must be taken under section 24ZA so that when children are on the premises, these precautions must include locking the air weapons away.
 - b) Removing the exception under section 23(3) that permits unsupervised possession by those under 18 years of age in certain circumstances.

E. Appraisal

ASSUMPTIONS

26. The assumptions used in this impact assessment (IA) are listed below. The consultation document asks respondents to comment on the assumptions and data used in this IA, so that this analysis can be refined in the future.
- It is estimated that there are currently, about 4 million air weapon owners⁵. In the absence of any available data, it is assumed that the number of new air weapons owners each year is equivalent to around 1 per cent of the current stock of air weapons owners.
 - It is assumed that around 30 per cent of air weapons owners have one child or more who are under 18 years of age living in their household⁶.
 - It is assumed that a third of air weapons owners will already hold a registered firearm⁷, and therefore already have lockable storage.
 - It is assumed that of the air weapons owners who live in households with children and do not also have firearms or shotguns held on certificate, 50 per cent will not already have lockable storage and will therefore need to take steps to enable the securing of their air weapons. Lower and upper bound assumptions of 25 per cent and 75 per cent respectively are also used.
 - It is assumed that the guidance on the new regulation is approximately 200 words.
 - It is assumed that the average reading speed is 100 words per minute⁸.
 - It is assumed that obtaining a lock costs £15 on average⁹.
 - This IA uses a 10-year appraisal period, a discount rate of 3.5 per cent and a base year (for prices and for present values) of 2019.

⁵ This figure has been provided internally by the Gun Trade Association

⁶ Office for National Statistics – “Families and Households 2017”

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2017>

⁷ HMICS - Inspection of firearms licensing (2018), paragraph 22:

<https://www.hmics.scot/sites/default/files/publications/HMICS20180306PUB.pdf>

⁸ <http://www.readingsoft.com/>

⁹ <https://www.wilko.com/en-uk/home/home-security-safety/padlocks/c/440>

Option 1

COSTS

Set-up costs

Current owners of air weapons

Lockable storage costs

27. There will be set-up costs to air weapons owners who will need to purchase a padlock or equivalent, in order to lock their air weapon away. This cost would only apply to those owners who do not already lock away their air weapon, and who hold their air weapon at a premises where those under 18 years of age are present.
28. Data from the Office for National Statistics suggest that around 30 per cent of households have dependent children¹⁰. If it is assumed that this proportion also applies to the estimated 4 million air weapon owners, this implies that 1.2 million air weapon owners will potentially be affected. Some households without dependent children may also be affected, for example grandparents who have grandchildren visit their house, but they have not quantified due to a lack of data.
29. However, some owners will already lock their air weapon away, or have the facilities to do so, because they are firearm or shotgun certificate holders and are therefore required to lock their registered firearms away (and it is assumed that they are all compliant with this requirement). In Scotland, where licences for air weapons are required, around one third of licensed air weapons are held on certificates for other registered firearms¹¹. If it is assumed that this proportion also applies in England and Wales, this would imply that around 400,000 air weapons owners would already have lockable storage for their registered firearms.
30. This leaves an estimated 800,000 air weapons owners with those under 18 years of age in their household who wouldn't already have lockable storage through ownership of a registered firearm. However, it is likely that many owners in households with children will already lock their air weapons away - perhaps because they will interpret the duty to take "*reasonable precautions*" as meaning that the weapon should be locked away, or because they have followed the Government's advice to do so¹². Many others will already have facilities to lock their weapons away, such as lockable cupboards, chests, loft spaces, utility rooms or wardrobes, and would not need to purchase a new lock as a result of this proposal.
31. As a central estimate, it is therefore assumed that 50 per cent of the estimated 800,000 owners who live in households with dependent children and do not also have firearms or shotguns held on certificate will need to take steps to enable the securing of their air weapons. Given the large amount of uncertainty associated with this central assumption, lower bound and upper bound assumptions of 25 per cent and 75 per cent respectively have been used. The number of air weapons owners who will need to invest in lockable storage is between 200,000 and 600,000, with a central assumption of 400,000.
32. The typical price of locks for wardrobes or cupboards is around £15¹³, resulting in an estimated one-off cost of around £6 million in England and Wales as a central estimate, with lower and upper estimates of £3 million and £9 million.

Familiarisation costs

33. There is likely to be a familiarisation cost to owners of air weapons to acquaint themselves with guidance on the new regulations. Assuming that the new guidance consists of approximately 200

¹⁰ Office for National Statistics – "Families and Households 2017"

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2017>

¹¹ HMICS - Inspection of firearms licensing (2018), paragraph 22:

<https://www.hmics.scot/sites/default/files/publications/HMICS20180306PUB.pdf>

¹² "Air weapons: a brief guide to safety" (2017): <https://www.gov.uk/government/publications/air-weapons-a-brief-guide-to-safety-jan-2011>

¹³ <https://www.wilko.com/en-uk/home/home-security-safety/padlocks/c/440>

words, it will take approximately two minutes to read the guidance at an average reading speed of 100 words per minute¹⁴.

34. Using an average value of non-working time of £5.30 per hour in 2019 prices¹⁵, this results in a total familiarisation cost of between £0.04 and £0.11 million across all affected air weapons owners, with a central estimate of £0.07 million.

Ongoing costs

New air weapons owners

35. There will be an ongoing cost to new owners of air weapons, who will have to invest in lockable storage when they purchase an air weapon for the first time (if there are children in their household and if they do not already have lockable storage).
36. In the absence of any available data, it is assumed that the number of new air weapons owners each year is equivalent to around one per cent of the current stock of air weapons owners. This means that the number of new air weapons owners who will need to invest in lockable storage each year is between 2,000 and 6,000, with a central assumption of 4,000.
37. Assuming that the average price of a lock is £15, the annual cost to new air weapons owners is estimated at between £30,000 and £90,000, with a central estimate of £60,000. The present value (PV) of these costs over the 10 year appraisal period is between £0.3 and £0.8 million, with a central estimate of £0.5 million.

14-17 year old users of air weapons

38. No statistics exist on the use of the “*private premises*” exception. In many cases, it is likely that this exception will be used for young people engaging in informal target practice, known as “*plinking*”. There may therefore be inconvenience caused to 14-17 year olds who engage in plinking, as they would need to be supervised by a person who is at least 21 years of age in order to use air weapons and will not be able to use them on private premises without supervision.
39. No data is available on the number of households where children engage in “plinking”. As a central estimate, it is assumed that 50 per cent of the estimated 1,200,000 households with air weapons owners and dependent children engage in plinking, with lower and upper bounds of 25 per cent and 75 per cent respectively. This results in an assumption of between 300,000 and 900,000 households where plinking occurs, with a central assumption of 600,000.
40. However, there is no robust data available on the monetary value of the inconvenience caused by having to be supervised while plinking, so this cost has not been quantified.

Family farms

41. However, in some cases, the exception may be used for pest control on family farms, although the number of family farms affected is not known. In these cases, there may be an economic cost if unsupervised 14-17 year olds no longer carry out pest control. It is assumed in most cases, family members who are 18 years or older would assume responsibilities for pest control, and 14-17 year olds would be deployed on other activities. It is therefore assumed that there would be negligible overall costs to family farms as a result of this change. The consultation invites respondents to comment on the assumptions used in this IA, so this assessment may be revised in future if further evidence is obtained which indicates that costs to family farms are likely to be incurred.

Cost to the Home Office of working with industry to improve security

42. The Home Office will be undertaking work with industry to improve the safe keeping and handling of air weapons. This includes seeking to ensure that home security devices such as security cords

¹⁴ <http://www.readingsoft.com/>. A range of reading speeds relating to poor, good and very good readers are provided.

¹⁵ <https://www.gov.uk/government/publications/tag-data-book>

are supplied with all new air weapons, to help minimise the risk of misuse; and to ensure that dealers explain the importance of secure handling and storage to purchasers of new air weapons in person at the point of sale, particularly in relation to access by those under 18 years of age.

43. It is assumed that the cost to the Home Office of these activities are negligible, as they will be subsumed within existing work with the industry. The cost to business of improving security measures has not been quantified, as it is a voluntary initiative.

The police

44. The police may experience some costs from enforcing the new regulations. However, given that the changes simplify and clarify existing regulation, an increase in enforcement costs is not anticipated. Additionally, compliance levels are expected to be high, given that the new regulations are relatively easy to comply with and many air weapons owners will already comply. The cost to the police is therefore assumed to be negligible.

Total costs

45. Total costs over 10 years are estimated to be in a range of £3.3 million to £9.9 million, with a central estimate of £6.6 million (PV).

BENEFITS

Society

46. The proposals will strengthen and clarify the requirement that owners of air weapons should take precautions to prevent children taking possession of them, and prohibit unsupervised possession. Taken together, there should be a benefit to society through improved public safety, by reducing the kind of high risk behaviour amongst unsupervised young people that has led to the tragic incidents, like harms and deaths, from the misuse of air weapons by those under the age of 18 years.
47. This benefit cannot be robustly estimated due to a lack of evidence on how many firearms-related injuries or fatalities are likely to be avoided following the changes. However, a breakeven analysis has been undertaken to illustrate the magnitude of benefits required in order for this policy to have a positive Net Present Social Value (NPSV).
48. The cost to society of a homicide is estimated at £3.4 million¹⁶ in 2019 prices. The PV costs of the policy are £6.6 million, so if the policy leads to a reduction in two homicides over the 10-year appraisal period then the NPSV of the policy would be positive.

Table 1, Summary of costs and benefits over 10-years (PV), £ million, 2020.

Costs	£m (PV)	Benefits	£m (PV)
Businesses	0	Unmonetised benefits:	
Individuals	7	Public safety	
Total cost	7	Total benefit	0
Net Present Social Value (NPSV)	-7		
Business NPV	0		
EANDCB	0		

Note: Home Office analysis, 2019, central estimate only.

¹⁶ <https://www.gov.uk/government/publications/the-economic-and-social-costs-of-crime>

F. Proportionality

49. This IA has identified the main costs and benefits that are likely to result from the policy options. These have been quantified where data is available, and a qualitative assessment, breakeven analysis, has been applied where there is a lack of data. The analysis is proportionate to the policy.

G. Risks.

50. The estimated number of households which do not currently have lockable storage available for their air weapons is based on a number of estimates and assumptions, and is therefore highly uncertain. If the actual number of households is much lower or higher than the figure which has been estimated, this will have a large impact on the cost of the policy to air weapons owners. This risk has been addressed by asking consultation respondents to comment on the assumptions and data used in this IA, to improve the evidence base.
51. It is assumed that the removal of the exception enabling 14-17 year olds to use air weapons on private premises without supervision will result in negligible costs for family farms, as adult family members will be able to undertake the pest control role previously undertaken by unsupervised 14-17 year olds, or supervise them. Potentially, the 14-17 year olds could be deployed on other tasks on the farm if required. However, if this is not possible and family farms need to employ external contractors to undertake pest control, then there may be some increased costs to family farms.

H. Direct costs and benefits to business calculations

NPSV, BNPV and EANDCB

52. There are no direct impacts to business expected from this policy, as explained in Section E. There are also no expected impacts on small and micro-businesses. The main group affected by this policy are households which possess air weapons, rather than businesses.
53. Table 1 presents the costs and benefits of the policy for the central scenario. There is an NPSV of -£7 million in the central scenario, compared with an NPSV of -£3 million and -£10 million in the low and high scenarios respectively.

I. Wider impacts

54. There are no significant wider impacts anticipated from this policy.

J. Trade Impact

55. This policy proposal is very unlikely to have any significant impacts on business, and therefore no impact on trade or investment.

K. Monitoring and evaluation, enforcement

56. This is a consultation stage IA . Subject to the outcome of the consultation, the measures set out in paragraph 5 will require primary legislation and will therefore be implemented when a suitable legislative vehicle becomes available, subject to parliamentary approval. Monitoring and evaluation will be informed by the consultation and further engagement with experts.

Impact Assessment Checklist

Mandatory specific impact test - Statutory Equalities Duties	Complete
<p>Statutory Equalities Duties</p> <p>The public sector equality duty requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations in the course of developing policies and delivering services. [Equality Duty Toolkit]</p> <p>We do not consider there are any significant PSED implications arising from the proposals in this impact assessment. However, the consultation will ask for views on the impact of the Government’s proposals on protected characteristics so that we can assess this more accurately.</p>	<p>Yes</p>

The impact assessment checklist provides a comprehensive list of specific impact tests and policy considerations (as of February 2019). Where an element of the checklist is relevant to the policy, the appropriate advice or guidance should be followed. Where an element of the checklist is not applied, consider whether the reasons for this decision should be recorded as part of the Impact Assessment and reference the relevant page number or annex in the checklist below. Any test not applied can be deleted except **the Equality Statement**, where the policy lead must provide a paragraph of summary information on this.

The checklist should be used in addition to [HM Treasury’s Green Book guidance](#) on appraisal and evaluation in central government (Green Book, 2018).

The Home Office requires the **Specific Impact Test on the Equality Statement** to have a summary paragraph, stating the main points. **You cannot delete this and it MUST be completed.**

Economic Impact Tests

Does your policy option/proposal consider...?	Yes/No (page)
<p>Business Impact Target The Small Business, Enterprise and Employment Act 2015 (s. 21-23) creates a requirement to assess the economic impacts of qualifying regulatory provisions on the activities of business and civil society organisations. [Better Regulation Framework Manual] or</p> <p>This policy does not have any impact on businesses.</p>	Yes

<p>Small and Micro-business Assessment (SaMBA) The SaMBA is a Better Regulation requirement intended to ensure that all new regulatory proposals are designed and implemented so as to mitigate disproportionate burdens. The SaMBA must be applied to all domestic measures that regulate business and civil society organisations, unless they qualify for the fast track. [Better Regulation Framework Manual]</p> <p>This policy does not have any impact on businesses.</p>	Section H
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