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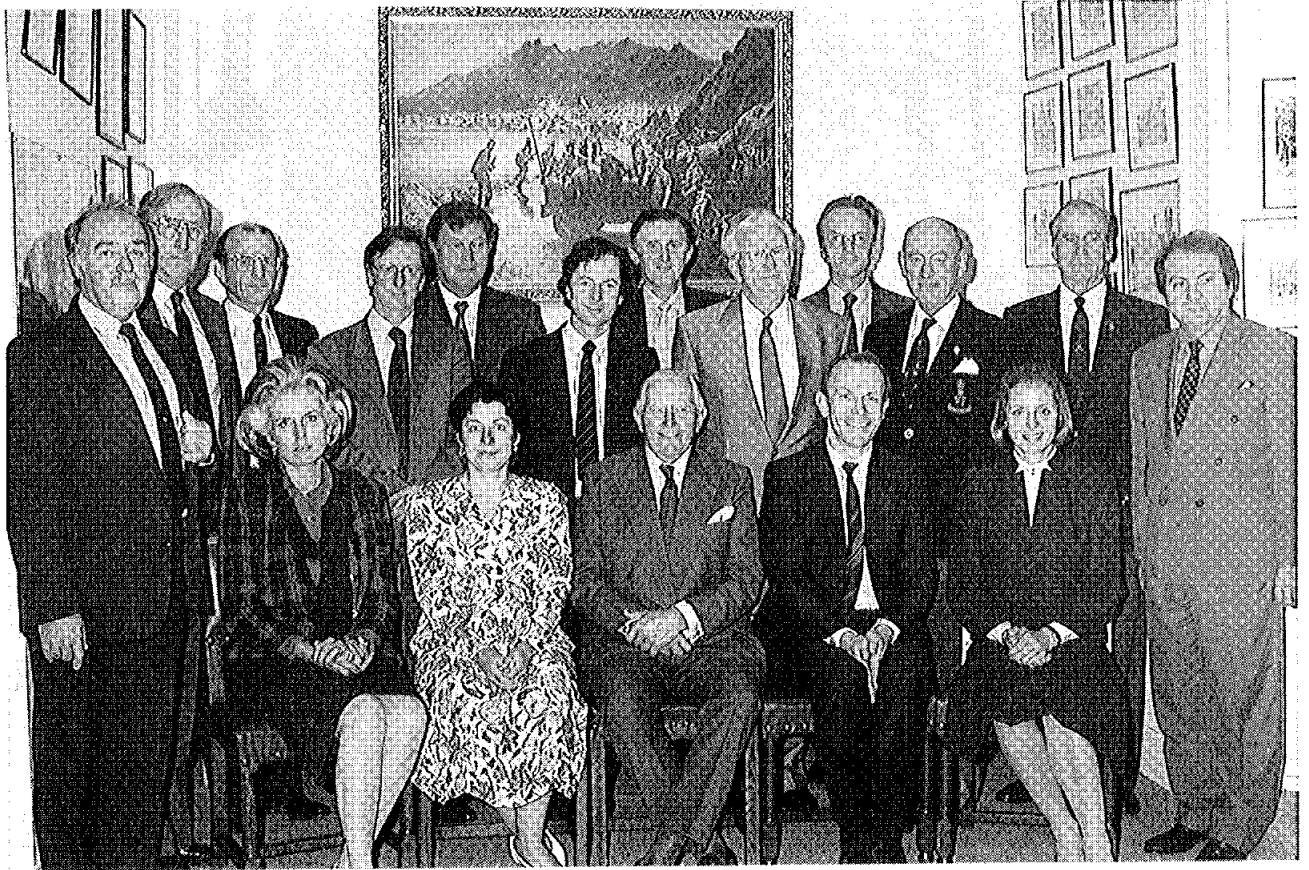
FIREARMS CONSULTATIVE COMMITTEE

SECOND ANNUAL REPORT

The Independent body established by an Act of Parliament to keep
under review the working of the Firearms Acts 1968-88

Firearms Consultative Committee

**ANNUAL REPORT
1990-1991**



The Chairman and Members of the Firearms Consultative Committee at Stirling Castle

Report of the Firearms Consultative Committee for 1990–1991

Presented pursuant to Act Eliz II 1988 C.45

Section 22(6) (Firearms (Amendment) Act 1988)

*Ordered by the House of Commons to be printed
18 July 1991*

**Annual Report of the
Firearms Consultative Committee**

Sir

I have pleasure in submitting to you as required by section 22(6) of the Firearms (Amendment) Act 1988 the second Annual Report of the Firearms Consultative Committee.

A handwritten signature in black ink, appearing to read 'Kimball', with a stylized flourish at the end.

THE LORD KIMBALL
Chairman

The Rt Hon Kenneth Baker MP
Secretary of State for the Home Department

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CHAPTER 1

Introduction

The Committee 1.1 The Firearms Consultative Committee is a statutory body set up under section 22 of the Firearms (Amendment) Act 1988 (reproduced at Annex A). Members appointed to the Committee are chosen from those who appear to the Home Secretary to have knowledge and experience of either the possession, use (in particular for sport or competition) or keeping of, or transactions in, firearms; or weapon technology; or the administration or enforcement of the provisions of the Firearms Acts.

1.2 Under section 22(8) of the 1988 Act the Committee is to exist for a period of five years from 1 February 1989 and may continue thereafter at the discretion of the Home Secretary. The Chairman, Lord Kimball, has been appointed for five years and members for a period of two years in the first instance from 28 September 1989. There have been a number of changes to the complement of the Committee and a list of current members is at Annex B.

Aims and Activities 1.3 The Committee's statutory function is to review the provisions of the Firearms Acts and to make recommendations for improving their working; to make proposals for amending the provisions of these Acts where necessary; and to advise the Home Secretary on other matters which he refers to us.

1.4 These terms of reference give us a broad measure of autonomy which we have aimed to use to put forward proposals for improving the administration of firearms legislation to the benefit of the shooting community, the police and the non-shooting general public.

1.5 In the course of our second year we met on seven occasions. Our meeting in September 1990 was held in Scotland at Stirling Castle by kind invitation of the then Chief Constable of Central Scotland. In March 1991 we accepted the hospitality of the British Association for Shooting and Conservation and met at their headquarters at Marford Mill, Clwyd, Wales and in May 1991 we met on board HMS Belfast, at the invitation of the Imperial War Museum.

1.6 These meetings gave us the opportunity to examine a wide range of issues of concern arising from both the administration and interpretation of the Firearms Acts. Some of these issues were ones of a long-standing nature well overdue for consideration and review. Others came to light during the course of our year's work. All had given rise to problems for the police and the shooting community alike and we have sought to arrive at sensible and practical solutions, wherever possible, for each. It is worth emphasising here, however, that

there will always be some issues for which no easy or obvious answer can be found, and no doubt some of the advice which we offer will not be to everyone's liking. The Committee have nonetheless endeavoured to formulate cogent proposals for change which we consider to be in the general interest.

CHAPTER 2

Programme of Work

2.1 The Committee's programme of work for this year was drawn from a list of topics which is reproduced at Annex C. It also included several issues which either formed part of our programme of work last year or arose during our discussions. We decided to give consideration during our second year to the following topics:

Validity of certificates and co-terminous certificates

Administration of the firearms licensing system

EC Directive

Estate rifles

Use of large magazine smooth-bore guns for clay pigeon shooting

Computerisation of dealers' registers

Purchase of shot gun ammunition

Good reason for possession of a shot gun

Specifications for the adaptation of shot gun magazines and the de-activation of firearms.

Other issues 2.2 The programme of work this year was an extensive and weighty one. However, the Committee were aware of the need to consider other matters brought to their attention which they perceived to be of national importance to the shooting community.

Publicity 2.3 On 27 December 1990 the Committee publicised its work programme by the issue of a news release (Annex D). We felt this was important so as to enable interested parties to make representations on topics for which they held a particular concern.

Representations 2.4 We have again, this year, received a large number of representations on a wide range of subjects. All representations are warmly welcomed. Any person wishing to draw the Committee's attention to particular concerns which can properly be put on an agenda for discussion should do so in writing to:

The Secretary
Firearms Consultative Committee
50 Queen Anne's Gate
London SW1H 9AT

It is important to remember, however, that it is not the function of the Committee to seek to intervene in or comment on individual applications for the grant or renewal of firearm or shot gun certificates or to act as an appellate authority where individuals are aggrieved by decisions made by chief

officers of police. Neither can the Committee endorse specific commercial products as this would be exceeding its terms of reference.

2.5 This report records our deliberations on the topics on the programme of work and other issues which came to the Committee's attention during the course of the year.

CHAPTER 3

European Commission Proposal for a Council Directive on the Control of the Acquisition and Possession of Weapons

Background 3.1 One of the most important and controversial issues facing the shooting community during the past year has been the European Commission's proposal for a Council Directive on the Control of the Acquisition and Possession of Weapons.

3.2 The Committee were made aware of the proposal, which forms part of the plans for the creation of the single market after 1992, during our first year. We decided, however, that consideration of the issue should be reserved until we knew how the proposal would develop.

Purpose of the Directive 3.3 The Directive seeks to bring firearms laws in the Member States of the European Community closer together by setting minimum standards to be included in the domestic firearms controls of each Member State. It also lays down rules governing the transfer of firearms across community borders and introduces a European Firearms Pass for those wishing to travel with their personal firearms to other Member States.

Consideration 3.4 The Committee were aware that the proposed Directive had caused widespread concern within the shooting community. We recognised that the British Shooting Sports Council (which was co-ordinating the response of British sporting interests) and representatives of the gun trade had, by strenuous lobbying, already made their concerns clear both to those responsible for negotiations on behalf of the UK and directly to the European Commission and Parliament. Nevertheless, we felt strongly that it was essential for us to consider in depth such an important issue, which would affect both the personal and commercial movement of firearms throughout the Community, and to make known our views before negotiations on the draft proposals were completed.

3.5 In the normal course of events the considered views of the Committee on any issue would be submitted to the Home Secretary in our Annual Report. We were aware, however, that as part of the process of parliamentary scrutiny of European legislation, the Directive would be examined on 5 December 1990 by Sub-Committee E of the House of Lords Select Committee on the European Communities. Accordingly, we presented our preliminary views on the proposal to the Sub-Committee by way of a submission forwarded by our Chairman, Lord Kimball. This submission, which is reproduced at Annex E, emphasised the Committee's particular concern that proper attention should be paid to the need to safeguard the interests of the vast majority of persons who own firearms and use them lawfully and safely in pursuit of their work or sport.

3.6 At the same time in view of the speed of negotiations in Brussels we decided exceptionally to offer comment on the proposal to the Home Secretary without delay so that our advice would be available before the Council reached its agreed common position on the Directive. To enable us to give sufficient time to discussion of what is not only an important but also a complex subject we arranged an additional meeting to our planned series for the year. This took place on 5 December 1990. At the meeting the Committee had before it the Parliamentary proceedings of the Commons debate on 29 November 1990. The Committee were pleased to note that substantial improvements on many aspects of the Directive which had disturbed the shooting community had been achieved by the Government in its negotiations with the European Commission and other Member States and as a result of the lobbying efforts by the shooting representatives in Europe.

**Conclusions and
Recommendations**

3.7 In the light of our discussion, the Chairman wrote to the Home Secretary on 10 December with the Committee's views. In view of the amendments achieved during the course of negotiations the Committee felt able to advise the Home Secretary that we had no fundamental objection to the Directive's adoption. Our letter, which is reproduced at Annex F, did however make a number of recommendations.

3.8 Because of the possibility that residents of some EC countries might be able to obtain the new European Firearms Pass (EFP) with few or no checks into their suitability to possess firearms, *we recommended* that in order to ensure public safety the British Visitor's Permit Scheme, introduced under the Firearms (Amendment) Act 1988, should be retained for the foreseeable future.

3.9 We were very concerned too about the movement within the EC of weapons and ammunition which have undergone a less stringent process of de-activation than is specified in our domestic firearms legislation. This could result in collectors or members of the public unwittingly committing an offence by bringing into this country weapons which they believe are de-activated but which under domestic legislation are still considered to be subject to control. Poorly de-activated weapons could also be easily re-activated for use by the criminal fraternity. For these reasons we felt that efforts should be made to achieve an agreed common European standard of de-activation of firearms no less rigorous than that approved under section 8 of the Firearms (Amendment) Act 1988. *We so recommend.*

3.10 The letter to the Home Secretary also included *our recommendations* about the operation of the European Firearms Pass and the sale of firearms to other community nationals.

3.11 In response we were pleased to receive a reply from the Home Secretary welcoming the Committee's comments on the proposed Directive and advising that our views had been carefully noted.

CHAPTER 4

Control of Explosives Regulations

Background 4.1 In April 1990 the Health and Safety Executive (HSE) published a consultation document setting out proposals for new regulations made under the Health and Safety at Work Act 1974 aimed at simplifying, consolidating and updating the controls on explosives contained in the Explosives Act 1875 and other related legislation. The proposed regulations would also introduce new requirements for the security of explosives.

4.2 The Committee were anxious to have the opportunity to examine the HSE's proposals in view of their likely impact on the shooting community in general and on home loaders in particular. Although an unfortunate misdirection of papers meant that we did not receive the consultation document until after the consultation period had closed, the Health and Safety Commission accepted our close interest in the proposals and agreed to consider any comments we might wish to make. The Committee's concerns, set out below, were conveyed by our Chairman to the HSE in correspondence.

An Explosives Licensing System 4.3 The proposed regulations aimed to simplify the current position (where fit person certificates and gunpowder licences are issued by the police under the Control of Explosives Regulations) by introducing a single explosives certificate to cover all modes of keeping explosives. It was also suggested in the HSE's consultation document that a fee might have to be charged to cover the police costs of issue.

4.4 The Committee were concerned that the checks and procedures to be carried out is part of the explosives licensing system would duplicate those made during procedures for the issue of shot gun or firearm certificates. This in our view cannot be a sensible use of resources. *We therefore recommended* to HSE that the proposed regulations should make provision either for the automatic grant of an explosives certificate to those already holding a shot gun or firearm certificate or for explosives certificates to be issued co-terminously with an existing shot gun or firearm certificate without additional investigation.

4.5 In recognition of the strong feelings among the shooting community on the level of fees for firearm and shot gun certificates, we felt strongly that any fee for an explosives certificate should be set on the basis of the actual cost to the police of issuing such a certificate. Accordingly *we recommended* to the HSE that the findings of the two reports on the administration of the firearms licensing system by the Association of Chief Police Officers and the British Association for Shooting and Conservation should be taken into account before any scale of fees was set.

Entry Powers 4.6 Under the proposed regulations enforcement of the proposals affecting private use of explosives would with certain exceptions fall to specifically appointed police officers. A police officer appointed as an inspector would have the authority to enter premises at any time to carry out his statutory responsibilities.

4.7 The Committee were concerned that the use of police officers, acting as the enforcement agents of HSE, who could enter private premises without a warrant to carry out an inspection, might very well be perceived by the shooting community as an unnecessary infringement of their civil liberties. *We recommended* therefore that the need for these sweeping powers should be reconsidered.

Limits on Gunpowder held for Private Use 4.8 The proposed regulations specified that the current limit of 15 kg of gunpowder which persons may keep for private use (in other than a registered or licensed storage space) be reduced to 5 kg.

4.9 After consideration of the effect such a reduction would have on the increasing number of shooters of muzzle-loading firearms or those who reload their own ammunition and on groups such as re-enactment societies, the Committee concluded that the existing upper limit of 15 kg should be retained. The private user of black powder and smokeless propellants can be affected by the continuity of supplies of powder. Because of strict regulations in respect of the handling and importation of black powder—which is no longer produced in commercial quantities in Great Britain—its users tend to buy in bulk. We also felt it was essential that users of black powder should not be tempted to substitute a readily available but unsuitable grade of powder. To do so would result in, at best, unsatisfactory performance and, at worst, a real safety hazard.

4.10 Subsequently further representations were made to us to the effect that, because of their widely differing storage and safety requirements, separate and distinct regulations should in fact be framed regarding the limits on each of black powder and smokeless powders. Smokeless powder regulations, so it was suggested, could be considerably less restrictive than is presently the case and an increased limit for private use of 20 kg was suggested.

4.11 The Committee fully supported the suggestion that black and smokeless powders should be regulated separately. We did not feel able, however, to endorse fully a 20 kg limit on smokeless powder although we certainly considered that the

arguments for increasing the level permitted for private use were worthy of further consideration.

HSE Response **4.12** The HSE's response to our submissions was encouraging. We were told that consideration was being given to the simplification of procedures for the issue of explosives certificates, including the possibility of making them co-terminous with firearm and shot gun certificates. It was expected that there would be no charge initially for the issue of an explosives certificate and any subsequent fee would be based on an assessment of the actual police costs incurred in administering the system after the regulation had been in operation for a period of time. We heard too that powers of entry contained in the proposed regulations would be restricted to police officers specially appointed and trained in enforcement of the regulations and that guidance would be given to the police on this. We were also pleased to learn that the proposed 5 kg limit on gun powder to be kept on private premises had been reconsidered, and that the HSE were now persuaded that the existing private use limits for smokeless powder and gun powder should be retained. This would mean that 15 kg of gunpowder could be kept, of which up to 5 kg might be substituted with smokeless powder. We understand that any further review of these limits will be undertaken in 1994 or 1995 in the context of proposed legislation on the manufacture and storage of explosives.

4.13 We further understand that the HSE's revised recommendation on private use limits has been accepted by the Health and Safety Commission and was included in the final proposal for Control of Explosives Regulations submitted in April of this year to the Home Secretary for his approval and signature. *We recommend* that the concerns expressed to the HSE also be borne in mind by the Home Secretary in his consideration of this matter.

CHAPTER 5

Estate Rifles

Background 5.1 From our discussions last year about the operation of the Visitor's Permit Scheme the Committee became aware that some difficulties had arisen over the administration and interpretation of the exemption from certificate control for estate rifles provided under section 16 of the Firearms (Amendment) Act 1988. This seemed to us to be an issue of particular concern to those involved in promoting deer stalking shooting holidays and deer management. Accordingly we considered that it merited consideration in depth as a separate issue.

Statutory Controls 5.2 Section 16 of the 1988 Act provides that:

(1) A person of or over the age of seventeen may, without holding a firearm certificate, **borrow** a rifle from the occupier of private premises and use it on those premises in the presence either of the occupier or of a servant of the occupier if:

- (a) the occupier or servant in whose presence it is used holds a firearm certificate in respect of that rifle; and
- (b) the borrower's possession and use of it complies with any conditions as to those matters specified in the certificate.

(2) A person who by virtue of subsection (1) above is entitled without holding a firearm certificate to borrow and use a rifle in another person's presence may also, without holding such a certificate, purchase or acquire ammunition for use in the rifle and have it in his possession during the period for which the rifle is borrowed if:

- (a) the firearm certificate held by that other person authorises the holder to have in his possession at that time ammunition for the rifle of a quantity not less than that purchased or acquired by, and in the possession of, the borrower; and
- (b) the borrower's possession and use of the ammunition complies with any conditions as to those matters specified in the certificate.

Home Office Guidance 5.3 Home Office Guidance, contained in paragraphs 13 and 14 of Chapter 4 of the document "Firearms Law: Guidance to the Police", is limited to a straightforward explanation of the terms of section 16. It offers no advice on specific arrangements whereby persons may benefit from the provision.

Problems Encountered 5.4 The estate rifles provision, which was introduced in the House of Lords during the passage of the Firearms (Amendment) Act 1988, allows non-certificate holders visiting

a shooting estate to borrow a rifle from the occupier of the premises and use it under the supervision of either the occupier or his servant.

5.5 The Committee recognised that the problem was one of uncertainty and disagreement about the scope of section 16. The crux of the problem, it appeared, was the question of the interpretation to be placed on the word “borrow” within the meaning in section 16. There were differing views as to whether the term excludes any element of payment, for example, where a rifle is used as part of a package deal on a shooting holiday.

5.6 The Committee noted that the problem was predominantly a Scottish one. It had arisen in the light of the views expressed publicly by one or two Scottish police forces that the exemption in section 16 enables only an occupier’s own guests to borrow a rifle and shoot on his land under the direct supervision of the occupier or one of his servants. Although the problem which had arisen in relation to estate rifles was not a particularly widespread or national one (we are not aware of any similar difficulties being experienced with police forces in England and Wales), we realise that for those wishing to take advantage of the exemption in section 16 the lack of unambiguous advice on the proper interpretation is most worrying and disconcerting; the more so since the unintended commission of criminal offences may result. We are most concerned that a restrictive interpretation of section 16 could place members of the public and visitors to this country in this unwarranted position. We have therefore considered most carefully whether a wider interpretation of section 16 is permissible, without any risk to public safety.

Consideration 5.7 In considering the complex legal arguments involved the Committee was most grateful to have the benefit of independent legal advice. This indicated that an occupier in terms of section 16 included both the owner of the land and the lessee of shooting rights, and that the concept of “borrow” did not always imply a gratuitous transaction. The Committee were impressed by the force of the arguments advanced and endorsed fully the views expressed.

5.8 The Committee also recognised the ancillary benefits to be gained by a less restrictive interpretation of section 16 than that taken by the Scottish police forces concerned. It would be unnecessary for the many sportsmen, both residents and overseas visitors, who stalk infrequently in Britain to purchase their own rifles, or to import them. Any risk which might be involved in transport of rifles would be obviated. We were also

aware that use of a rifle by virtue of the estates rifle provision would pose little or no danger to public safety or the peace as the person borrowing the rifle must be closely supervised by the occupier or his servant at all times. Furthermore, police time devoted to the issuing of firearm certificates and visitors' permits would be significantly reduced if customers on shooting holidays were able to benefit from the exemption in section 16.

5.9 Against this we recognised that a more narrow interpretation of section 16 is possible since section 57 of the Firearms Act 1968 defines the notion of "acquire" as either hire, accept as a gift or borrow. This suggests that there is a distinction to be drawn between the concepts of "hire" and "borrow" within the meaning of the Firearms Acts. On the basis of this interpretation customers who pay for a shooting holiday where payment includes the use of a rifle may not fall within the exemption in section 16 since they are "hiring" rather than "borrowing" a rifle. The Committee considered that much would depend on the nature of the various arrangements and facts in each case but that as a matter of good practice those who entered into arrangements to participate in shooting holidays should ensure that "a borrow" means a "borrow". We were also aware of the view that the wider interpretation of section 16 might possibly jeopardise the safety of the public, with large numbers of persons being permitted to use rifles temporarily without checks being made on their suitability or reason for holding firearms.

Conclusions and Recommendations

5.10 Although the difficulties which have arisen about interpretation of the scope of section 16 are relatively minor, they have, nevertheless, caused a significant degree of controversy among the shooting community. The views expressed to date by those police forces involved have also created anxiety for those running and participating in shooting holidays and deer management.

5.11 Ultimately, the question of what will constitute a "borrow" within the meaning of section 16 is a matter of fact and law, for the courts to decide. However, in the absence of any definitive ruling to date, the Committee were impressed by the arguments put forward in favour of a more liberal interpretation of section 16. Weighing the balance of risk and advantage, we believe that, as the occupier's firearm certificate, an essential prerequisite for his business or sport, is at risk in the event of any unlawful behaviour on the part of those "borrowing" his rifle, then he will have every motivation to ensure proper supervision. Accordingly, *we recommend* that,

subject to the views of the courts, the notion of “borrow” in terms of section 16 should be construed to include a transaction which is not necessarily gratuitous. In view of the uncertainty about the proper meaning of section 16, *we further recommend* that the Home Secretary gives consideration to amending section 16, whenever a suitable early opportunity arises, to clarify the scope of this provision.

CHAPTER 6

Use of Large Magazine Smooth-bore Guns for Clay Pigeon Shooting

Background 6.1 Following their reclassification to section 1 control we have received a number of representations about the use of large magazine smooth-bore guns for clay pigeon shooting. The issue was brought to the Committee's notice last year because of apparent inconsistency of practice in the administration of the stricter controls on these guns by police forces up and down the country. Home Office guidance given to the police indicates that clay pigeon shooting should not be regarded as a good reason for possession of a large magazine smooth-bore gun. Some police forces have been placing territorial conditions on firearm certificates which prevent the use of these guns for clay pigeon shooting. This has caused confusion and resentment in the shooting community.

6.2 The Committee decided, therefore, as part of our 1989 to 1990 programme of work, to examine whether once a good reason has been demonstrated for acquisition and possession of a large magazine smooth-bore gun, for example, for vermin control, the holder should then be allowed to use it for clay pigeon shooting as well as for its primary purpose. Because of the many views expressed on the subject the Committee were anxious that as full consideration as possible should be given to every aspect of the arguments raised. We therefore decided to carry forward consideration of this subject to this year's work programme.

Statutory Controls 6.3 Section 2 of the Firearms (Amendment) Act 1988, which came into force on 1 July 1989, raised to the category of section 1 firearms all smooth-bore guns with a barrel of 24 inches or more having a magazine capacity of more than two cartridges.

Home Office Guidance 6.4 Chapter 6 of the Home Office document "Firearms Law: Guidance to the Police" states that:

"An applicant wishing to obtain a certificate for a smooth-bore gun with a magazine capable of holding more than two cartridges must demonstrate a reason applicable to a larger capacity smooth-bore gun. There are relatively few instances in which a limited capacity smooth-bore gun will not serve as well. Clay pigeon shooting, for example, does not require a participant to discharge more than two shots before reloading and the Wildlife and Countryside Act 1981 prohibits the use of the larger capacity weapon to take wildlife other than under certain conditions. However, an application to use such a gun, for example, for controlling wood pigeons and similar pests on a farm or for practical target shooting by a member of a relevant

organisation, should normally represent a good reason for the grant of a certificate”.

Initial Consideration 6.5 The Committee’s initial consideration of this issue is set out fully in Chapter 5 of our last report. In brief, we heard that the guidance had been drafted in consultation with national shooting organisations which took into account Clay Pigeon Shooting Association (CPSA) rules. These do not recognise any clay discipline requiring more than two shots. We did note, however, that competitions do take place, which are not subject to CPSA rules, where competitors discharge more than two shots.

Further Consideration 6.6 In looking at this matter further we fully appreciated the concern expressed by the shooting community for not only clear guidance on the use of section 1 smooth-bore guns for clay pigeon shooting but also the need for further publicity about the change in classification to firearm status brought about by the 1988 Act. While we noted that nearly 50,000 large magazine smooth-bore guns have been adapted downwards and marked as such by the proof houses in accordance with the requirements of the new legislation, we recognised that there were a number of owners of such guns who, for one reason or another, were not aware of the new controls. We urge that further consideration be given by all those concerned, including the Home Office, the trade and the shooting organisations, to making such people aware of the need to keep on the right side of the law by ensuring that their guns are legitimately held on the proper certificate.

6.7 In considering the use of large magazine smooth-bore guns for clay pigeon shooting, the Committee were aware of the view held by many in the shooting community that the police, when granting a firearm certificate, had already made a judgment on a person’s suitability to hold a firearm subject to section 1 control. It was argued that it was unreasonable, therefore, once a good reason for possession of a large magazine gun had been established, to object to its use for clay pigeon shooting as an ancillary purpose, particularly since registered clay pigeon shoots were properly regulated. We heard that these guns had been used on such occasions over the last 90 or so years. It was asserted that it could be seen as paradoxical, not to say cruel, to permit the use of large magazine smooth-bore guns on live quarry while denying the holders the opportunity to practice their shooting at a moving artificial target so that they could improve their aim and kill humanely.

6.8 The Committee also bore in mind the fact that Parliament

had seen fit to limit the possibility of these weapons falling into the wrong hands by raising them to section 1 control. It had done so in the knowledge that large magazine smooth-bore guns had been used for clay pigeon shooting. It was argued that certain women, young people and the disabled might choose to use a self-loading shot gun in order to enjoy the advantages of a lower perceived recoil. The Committee, however, recognised that the same advantages can be gained by the use of a purpose made two-shot magazine self-loading gun or a similar weapon with a suitably adapted magazine, which could be held on a standard shot gun certificate. Some 50,000 owners of such guns had complied with the requirements of the new law, even if this meant personal loss or incurring the financial cost of adaptation. We were also aware that large magazine pump-action guns have on a significant number of occasions been used in serious crimes in the course of which people have been killed or injured.

6.9 Developments in weapon technology [see Chapter 10 paragraph 10.5.] indicated to us that there are a growing number of section 1 shot gun systems on the market in other countries which bear little or no resemblance to traditional sporting shot guns and are designed as close assault weapons for paramilitary purposes. The Committee did not consider however that it would be in any way appropriate to prohibit large magazine smooth-bore guns by reclassifying them as weapons subject to control under section 5 of the Firearms Amendment Act 1968 as amended.

6.10. During the course of our discussion the Committee noted the outcome of a case heard in Cardiff Crown Court against the decision of the Chief Constable of South Wales to refuse to vary an applicant's firearm certificate to allow the use of a large magazine smooth-bore gun for clay pigeon shooting. The appeal court held in that case that the chief officer of police had not exercised his discretion unreasonably and dismissed the appeal. The Committee therefore considered whether the Crown Court judgment raised any matters or doubts which in turn provided grounds for issuing further guidance to the police.

6.11 It seemed right to us, in view of representations made about the use of large magazine smooth bore guns for secondary or ancillary purposes, to look also at the primary purpose for which such guns are acquired. We noted that the Guidance issued by the Home Office to the Police indicates *inter alia* that a good reason for the acquisition of such guns is the control of vermin. The Committee were not entirely persuaded that this is necessary or justified. We noted in this

regard that views were expressed that traditional shot guns could be employed to equally good effect by experienced shooters.

Conclusions and Recommendations

6.12 We accept that the current position is anomalous and that the unfairness caused has generated uncertainty and confusion in the shooting community. Paramount among our concerns in considering this issue has been the need to resolve that uncertainty, in a way which would not risk compromising public safety, so that holders of large magazine smooth-bore guns may be clear where they stand. The current confusion over their use has arisen because of guidance to the police that vermin control should generally be accepted as a good reason for possession of a large capacity gun. But bearing in mind, as we must, Parliament's decision that these weapons should be subject to stringent controls we are not entirely persuaded that any extra efficiency over traditional double-barrelled shot guns which they bring to the task of controlling vermin outweighs the other considerations.

6.13 In the Committee's majority view, therefore, the best way to resolve the current unfairness and uncertainty, while avoiding a dilution of the restrictions on these weapons, is to standardise more uniformly the regime. Accordingly, *we recommend* that the Home Office consider amendment of its "Guidance to the Police" to delete the advice that vermin control should normally represent a good reason for the grant of a firearms certificate for a large magazine smooth-bore gun. In making our recommendation we recognise that this may in turn result in consideration being given to amending the legislation to introduce controls which are tighter but fairer and more consistent.

CHAPTER 7

Computerisation of Dealers' Registers

Background 7.1 The Firearms Act 1968 requires a registered firearms dealer to keep a register of transactions and to enter into it certain specified details of all transactions which he undertakes. The form of the register, which was drawn up at a time when all registers were kept in a manual form, is prescribed by the Firearms Rules 1989.

Problems Encountered 7.2 The Committee's attention was drawn last year to problems which have arisen as a result of the increasing trend towards the use of computerised registers. A growing number of dealers, particularly those engaged in large commercial transactions involving the movement of firearms, utilise computers, often with specialised software programmes to facilitate their business requirements. We were not made aware of any difficulties experienced by such dealers with their local police; but most, if not all, dealers who use computerised record systems kept a parallel manual record of transactions in order to satisfy the statutory requirements. Representations on behalf of the trade were made to the Committee pointing to the duplication of effort and the bureaucracy involved in such a system. The Committee began its consideration of this problem last year and decided to carry forward our examination to this year's programme of work. In particular the Committee considered whether it would be appropriate for records relating to firearm transactions to be maintained solely on a computer database and whether this would satisfy the requirements of the current law.

Statutory Controls 7.3 Section 40(1) of the Firearms Act 1968 requires that:

“... every person who by way of trade or business manufactures, sells or transfers firearms or ammunition shall provide and keep a register of transactions ...”.

7.4 The form of the register is prescribed in Schedules IV and V of the Firearms Rules 1989 which specify, among other things, that:

“1. The register may be kept in the following manner:
(i) the four parts of the register may be kept in separate books”.

7.5 Every person keeping a register in accordance with the provisions of section 40 and schedule 4 of the Firearms Act 1968 is required under section 40(4) to produce the register for inspection on demand by a police officer or a customs officer. Section 38(8) of the same Act requires a dealer to surrender the register to the chief officer of police if his name is removed from the police register of dealers.

Consideration 7.6 In considering the concept of computerised dealers' registers, the Committee had regard to independent legal

opinion submitted by the Shooting Sports Trust Limited. We noted that in Counsel's opinion, while the legislation clearly did not envisage the keeping of a register on computer, a computerised record could in fact amount to a register in the terms of the Firearms Acts since the term was not restricted to a book or volume, or any written record.

7.7 In support of this, the Committee noted that computerised firearms dealers' records were acceptable for other purposes, such as VAT inspections carried out by HM Customs and Excise. Such inspections were often more detailed than those carried out by the police under the Firearms Acts. Since most computer packages included an audit trail to detect falsifications, it would be possible for the police to detect fraudulent entries on the records by examination. It followed that since the same basic information was being held for this purpose and for the statutory inspection of registers by the police under the 1968 Act, the concept of computerisation should be equally acceptable and valid in both cases.

7.8 In discussion, the Committee further noted, however, that Part V of the Firearms Rules 1989 specifically refers to the four parts of the register being able to be kept in separate *books*. There was also uncertainty as to what would constitute the register. Would this comprise computer hardware or software, or both? It seemed questionable to us whether an inspection under section 40(4) of the 1968 Act could be deemed properly to have taken place unless an officer of police had direct access to the computer system itself. We also considered that there would be practical difficulties under the current law where a dealer whose name had been removed from the register of dealers was required to surrender his register of transactions to his local chief officer of police or to the courts. The Committee also noted that the Police and Criminal Evidence Act adopts a more cautious approach to the admissibility of computer information in any criminal proceedings, presumably on the basis that a computer can be more easily tampered with or can simply be defective.

Conclusion and Recommendations

7.9 We accept that there have been substantial technological advances in management information systems since the enactment of the Firearms Act 1968. Accordingly, it would be pointless to argue against the advent of computerisation in the field of firearms. We see no objections of principle against the concept of computerised dealers records, which represents no more than a natural progression in the use of technology to improve business efficiency. However, mindful of the uncertainty arising from the proper interpretation to be placed on the scope of the current law, on which only a court can give

a definitive ruling, we think it unwise to rely on the present law as permitting computerised records to be considered as a register under the Firearms Acts.

7.10 Accordingly, *we recommend* that the Home Secretary takes steps to amend the law to make it clearly acceptable for dealers to maintain their registers on computer. We recognise, however, that for many smaller firearms dealers it would be impracticable and disproportionately expensive to move to a computerised system and for that reason *we recommend* that provision should continue to be made for dealers to keep their registers in manual form if they so choose.

CHAPTER 8

Administration of the Firearms Licensing System

Background 8.1 During both our first and second years of work, the way in which the firearms licensing system is administered has been a major topic of discussion for the Committee. It is clear from the many representations we have received over the past two years that a significant number of problems about a substantive number of aspects had arisen primarily from police administration of the controls. We were also aware that problems had been aggravated by the introduction of new and controversial legislation in 1988. Differing interpretations of the statutory provisions and varying practices during the enquiry, administrative and decision making processes of the licensing system had led in many cases to confusion, mistrust and a general deterioration in relations between members of the shooting community and their local police. Police manpower and financial difficulties had resulted in delays in the issue and renewal of firearm and shot gun certificates. We were aware that problems of administration, which had caused, for example, delays in the renewal of certificates which left shooters without certificates and on the wrong side of the law, did little to dispel a growing distrust of the police by the shooting community.

Fees 8.2 The Committee were particularly conscious of the close relationship between the system of licensing administration and fees for the grant or renewal of a firearm or shot gun certificate, particularly since it is the Government's policy to recover the full costs of a licensing system through fees. It was evident that the level of fees for the grant or renewal of firearm and shot gun certificates is a matter of mutual concern to both the shooting community and the police. The Committee's views on increases in fees were expressed by our Chairman during the debate in the House of Lords on 23 March 1990 on the Firearms (Variation of Fees) Order 1990 when he said:

“... [the Committee] felt most strongly that the concerns of the shooting community about the level of fees should be put on record and that the reasons and justifications for the increase should be clearly explained. After all, members of the shooting community must bear the burden of the increase”.

8.3 It seemed to us from the problems brought to our attention that the administrative difficulties involved with the issue of shot gun certificates were greater than those for firearm certificates. In particular, we noted that it was often the case that an applicant for a shot gun certificate was required to show “good reason” to hold a shot gun. We heard that some police officers were asking questions, as a matter of routine, about where and for what purpose a shot gun would be used, and requesting evidence that permission had been granted to

use it on certain areas of land. Considerable problems had also arisen about the "safekeeping requirement" for firearms and shot guns and whether this should entail a visit and an inspection of a certificate holder's firearms.

8.4 It was clear from the problems being encountered that the administration of the firearms licensing system was at the root of many of the problems identified and that a properly and consistently administered firearms licensing system would greatly improve the relations between the police and the shooting community. The resultant increases in cost effectiveness and efficiency would also be of immense benefit to both parties.

8.5 The Committee therefore welcomed the initiatives taken by the Association of Chief Police Officers (ACPO) and the British Association for Shooting and Conservation (BASC) to undertake separate and comprehensive reviews of the firearms licensing procedures and the cost of the system. We felt that these studies would make a very necessary and important contribution to a review of the current system.

8.6 At our meeting in March 1991 individual presentations were made by the University of Exeter on the Coopers and Lybrand Deloitte study commissioned by the BASC and by ACPO. We would like to record our appreciation to both study teams for their presentations. Copies of both reports, which are now publicly available, were also laid before the Committee for consideration.

Consideration **8.7** The Committee were greatly impressed by the arguments advanced in both reports. There were many common themes and recommendations to which we could offer our support. Both reports made helpful and sensible suggestions for change and had the obvious common aim of introducing a more efficient and cost effective firearms licensing system in which the interests of the police, the shooting community and the public concern for safety were adequately represented and balanced.

8.8 Both reports identified three key issues central to enhancing efficiency: computerisation, civilianisation and centralisation. Our Chairman had visited the firearms licensing department at Cambridgeshire Constabulary to see at first hand the benefits of a centralised system administered by civilians. We were also already aware of the general moves nationally towards the civilianisation of posts previously occupied by police officers. The current trend towards the use of specially trained civilians to carry out the administration of

the licensing system would, we understood, free uniformed officers to tackle problems of crime in the community. We were also aware of the substantial resource benefits of both civilianisation and centralisation.

8.9 The ACPO report, we feel, makes a significant number of welcome practical and cost effective recommendations. Its substantial proposals for changes to streamline the existing system, save costs and increase efficiency are, in our view, beneficial and achievable in the short term. The Committee also support the thorough investigation of all initial applications for certificates. This would reduce the need for further detailed enquiries on renewal. It would also facilitate the adoption of a postal renewal system where appropriate, which would result in further significant reductions in costs.

Conclusions and Recommendations

8.10 The Committee endorsed all but one of the recommendations in the ACPO report [Annex G]. We did not agree that the period of validity of firearm and shot gun certificates should necessarily be increased to an arbitrary period of five years. *We recommend* instead that the Home Secretary should take powers to vary the period of validity of a certificate. In view of this strong link between the period of validity of certificates and the level of fees for firearm and shot gun certificates, *we further recommend* that the Home Secretary give urgent consideration to reviewing the period of validity of certificates and extending them to an appropriate level in advance of any fees order.

8.11 The Committee were encouraged by the considerable degree of common ground in both the ACPO and BASC reports, which in many respects complemented each other. However the Committee had reservations about the recommendations made in the BASC study relating to the concept of a basic core cost for a firearm or shot gun certificate, to which extras could be added. We felt that this was likely to result in disputes between the police and the public. It was the view of the Committee that charges should remain nationally standardised.

8.12 *We recommend* that both reports are looked at closely by the Home Secretary with a view to the formulation of a best practice model of current practices, on which an assessment of appropriate levels for fees can be based.

8.13 *We also recommend* to the Home Secretary that section 54 of the Firearms Act 1968 should be extended to allow civilians employed by police authorities to be in possession of firearms in the course of their official duties.

8.14 Notwithstanding our endorsement of the ACPO and BASC proposals for change to the current licensing system, the Committee were conscious that it was important to look to the future. A more radical overhaul of the way in which firearms are licensed may be desirable. We will be considering how to take such a review forward in the coming year of work.

CHAPTER 9

Air and Gas Powered Weapons

Air Weapons 9.1 The Committee were aware that a number of incidents involving the misuse of air weapons has given rise to considerable, and understandable, public concern in recent years. These have led to frequent demands for tighter restrictions on air weapons. We felt that consideration should be given to whether there is a justifiable and demonstrable need for more stringent controls.

Statutory Provisions 9.2 Section 1(3)(b) of the Firearms Act 1968 provides that low powered air weapons, that is those not of a type to be declared specially dangerous by the Secretary of State, are excluded from certificate control. However such air weapons may still constitute firearms within the meaning of the Firearms Act. Under the Firearms (Dangerous Air Weapons) Rules 1969 air pistols with a muzzle energy in excess of 6ft lbs and air weapons, other than air pistols, with a muzzle energy in excess of 12 ft lbs have been declared as specially dangerous and are subject to the certification requirements in the Firearms Acts.

9.3 Although air weapons are exempt in many cases from certificate control, their use for criminal purposes is penalised in the same way as the misuse of any other firearm. There are restrictions on the possession and use of air weapons by young people under the age of seventeen.

Consideration 9.4 The Committee appreciated that it was essential to prevent, as far as practicable, those not able to exercise proper care and responsibility from having access to air weapons. We were also acutely conscious of the sometimes tragic consequences of the misuse of air weapons.

9.5 The Committee were aware, however, that a balance needed to be struck between the imposition of controls designed to prevent the unlawful use of air weapons and the need to avoid curtailing the legitimate activities of many shooters who used them responsibly, for vermin control or in pursuit of their sport, without any danger whatsoever to the public safety or the peace. We were aware that air weapons are used extensively in target shooting and to train young shots in the basics of good gun handling and marksmanship. We heard also that the misuse of air weapons, when expressed as a percentage of their legitimate use, was minimal.

Conclusion 9.6 We are not convinced that tightening of the present controls on air weapons, a move which would place further restrictions on responsible shooters, would reduce air gun misuse to any substantial extent.

9.7 While we consider that the law as it stands is adequate to

deal with current levels of misuse, we feel strongly that public awareness and understanding of the law and of the remedies available for the improper use of air weapons should be increased. For this reason *we welcome* the forthcoming publication by the Home Office of a new information leaflet on air weapons aimed at explaining the law and giving advice on safety to young people, their parents and guardians.

Other Gas Powered Weapons

9.8 In recent years gas powered weapons, usually those powered by carbon dioxide (CO₂), have become widely available as an alternative to conventional air weapons and are used in air shooting disciplines and competitions. There has also been a rapid proliferation in the development and use of these weapons to discharge paint pellets in adventure and survival games.

9.9 The Committee notes that the gaseous compound CO₂ has been held by the courts to be distinct from air (although it is a constituent of air) for the purposes of defining an air weapon. This means that under the present law weapons powered by CO₂ (and other compressed gases except air) cannot be regarded as exempt from certificate control in the same way as low powered air weapons (section 1(3)(b) of the Firearms Act 1968 refers).

9.10 The Committee considered it anomalous that low powered CO₂ weapons which have a similar muzzle energy to low power air weapons should be more strictly controlled under the Firearms Acts. In our view, such weapons should be treated in the same way as their air powered counterparts, and exempted from certificate control; and *we so recommend*.

CHAPTER 10

Other Issues

Trophies of War **10.1** The possibility of weapons seized during the Gulf conflict entering this country in the possession of military personnel prompted the Committee to give urgent consideration to how these weapons might be retained legitimately by servicemen as souvenirs without the risk of them falling into the wrong hands. We were also anxious to ensure that firearms of historic value which were seized in battle should be made available to interested museums.

10.2 Items of military equipment seized in battle become, we understand, under international agreement, the property of the capturing nation and not of individual service personnel. Our concern was that, notwithstanding this arrangement, individual servicemen would attempt to bring back with them on return from the Gulf items seized on the battlefield which might include firearms.

10.3 It seemed to us preferable to permit trophies of war to be held here under carefully regulated control than to prohibit them, which might result in such weapons being kept illicitly. For this reason we considered that the current regulations should be amended to allow servicemen to bring souvenir items of military equipment back with them into the UK provided that they submitted any firearms for a process of deactivation to a recognised standard. To this end the Committee's views were forwarded for consideration in a letter of 6 March from our Chairman, Lord Kimball, to the Armed Forces Minister, Mr Archie Hamilton MP. This is reproduced at Annex H.

10.4 To our disappointment Mr Hamilton made it clear in his reply that the Government was not prepared to change the existing rules. He did assure us, however, that comprehensive security arrangements, which had been drawn up in the light of the Falklands conflict, were now in place to ensure as far as possible that captured weapons would not be brought into the country illegally. We are also pleased to report Mr Hamilton's full acceptance of our concern that any firearms of interest to the national heritage should be donated to museums in the National Museums Consortium which have a special interest in the history of firearms, such as the Imperial War Museum. We understand that the Ministry of Defence has since been in contact with the Imperial War Museum.

Developments in Weapon Technology **10.5** During our discussions about the use of large magazine smooth-bore guns for clay pigeon shooting we heard about the proliferation of close assault style shot gun systems and large magazine pistols which bore little resemblance to those used now for sporting purposes in this country. Such weapons were

available in the USA and Europe and their use was often portrayed as a tool of violent persons in television programmes and films. The Committee noted with concern the effect on the public which the media promoted by its portrayal of weapons in this way.

10.6 We also became aware that alternative types of ammunition were now appearing on the United Kingdom market. One alarming example of this is the “flechette” cartridge, which contains a cluster of fine needle point darts capable of penetrating steel sheeting at long range and most of which can be discharged from any shot gun. We were also informed that since they are not caught with certainty as prohibited weapons under section 1 of the Firearms (Amendment) Act 1988, most of these assault weapons and ammunition can currently be held on a firearm certificate.

10.7 Although conscious that the most important consideration is not the appearance of any weapon but its lethality, the Committee were concerned about the attractiveness of close assault weapons to those in the criminal fraternity by reason of such public perceptions, and the possible danger to the public associated with their use by those not trained or involved in recognised shooting disciplines. We also came to the view that assault style weapons and ammunition had little or no sporting application in the civilian use of firearms.

Minimum Age for Possession of a Firearm

10.8 During the year the Committee were made aware of the difficulties being encountered by juveniles in making applications for shot gun certificates.

10.9 It is beyond our remit to intervene in individual applications or indeed to seek to act as an appellate authority where individuals are aggrieved by the decisions of chief officers of police. We do, however, recognise the importance of training young people in the safe use of firearms. We intend therefore to examine next year the problems associated with introducing young people to the sport of shooting, as part of a general review of the age limits.

Miniature Rifle Ranges

10.10 The Committee’s attention has also been drawn to a possible loophole in firearms controls in the form of the provision in section 11(4) of the 1968 Act exempting from certificate control those “conducting or carrying on a miniature rifle range or shooting gallery”. We recognise, however, that the exemption has been retained in firearms legislation since it was first enacted in 1920 and we do not intend to recommend changes in haste. We are particularly conscious that such

changes might lead to the demise of those smaller clubs with too few members to qualify for Home Office approval. In view of the unsatisfactory state of the law we are glad to accept an offer by the Home Office to set up a small working group of Committee members to consider the way forward. Once we have considered the working group's findings we will publish our conclusions in next year's report.

**Purchase of Shot Gun
Ammunition**

10.11 Section 5 of the Firearms (Amendment) Act 1988 makes it an offence to sell ammunition to a person unless he can produce a firearm or shot gun certificate. Although the Committee recognised that this provision had been introduced primarily as a safety measure to make it more difficult for a criminal to buy ammunition for a weapon he had acquired illegally, we were aware that the need to produce a certificate when purchasing ammunition had been causing considerable inconvenience to would-be purchasers and dealers alike.

10.12 As a possible aid to shot gun holders wishing to purchase ammunition but who are unwilling to carry on their person a bulky certificate, we were attracted to the possibility of the police issuing small credit card style firearm and shot gun passes in addition to certificates. It was suggested that such passes, which were more easily carried than certificates, could be used primarily as a means of identification and authorisation.

10.13 Unfortunately, after detailed examination of this idea, we concluded that there were legal objections to the introduction of firearm and shot gun passes. Since the Firearms Acts refer to "certificates" only, a pass could have no legal status under the present law. We were conscious too of the practical and resource implications for the police of issuing passes and the possibility that the resulting expense would be added to certificate costs.

10.14 Nonetheless we do see many advantages in firearm and shot gun passes. We shall therefore be discussing how the difficulties might be overcome as part of a wider consideration next year of the format of firearm and shot gun certificates and a number of potential solutions remain under consideration.

**Specifications for the
Adaptation of Shot Gun
Magazines and the
De-activation of Firearms**

10.15 The Committee were made aware of difficulties experienced by the police in distinguishing between shot guns manufactured abroad in a two-shot capacity and those which had been manufactured as multi-shot weapons but had subsequently been adapted to a two-shot capacity. Guns of the latter type were required to be marked and certified as having been adapted by the Proof Houses. To alleviate this problem,

and more generally to promulgate best practice, the Committee considered it would be beneficial if common European standards for both the restriction of magazine capacity and marking of shot guns with restricted magazines were introduced.

10.16 The Committee also heard that the Home Office booklet, "Firearms Law: Specifications for the adaptation of shot gun magazines and the de-activation of firearms," was in the process of being revised and updated. It is proposed that in future the booklet should be produced in a loose-leaf format to facilitate regular updating. We considered this a sensible proposal which we wholeheartedly endorse.

**Working Group on
Target Practice**

10.17 We first looked at the definition of target practice in section 15 of the 1988 Act as part of our 1989 to 1990 programme of work. The issue arose from the statement in the Home Office publicity leaflet on the approval system for rifle and pistol clubs that *target practice does not include participation in sporting events or competitive shooting*. This contradicted the customary understanding, which had applied over the 70 years that the exemption from certificate control for club members had been in force, and we made a firm recommendation in last year's report that the expression "target practice" should be interpreted as embracing all forms of competitive shooting.

10.18 We were pleased that following publication of our report the Home Secretary accepted our recommendation and agreed that the Home Office leaflet should be amended accordingly. He also set up a Home Office working group to consider possible changes to the law. Several of the Committee's members were invited to become members of that group.

10.19 The working group made three recommendations. Firstly, it recommended that the simplest way to resolve the legal doubt about what activities the term "target practice" permitted was to *replace "target practice" in section 15 with "target shooting"*. Secondly, the group recommended that *the exemption in section 15 should apply only to weapons held on a club certificate*. This would make clear that loans or transfers of weapons held on an individual's certificate remain the responsibility of that individual. To prevent this change from inhibiting normal safe club practice the group also recommended that a further clarification to the law should be made to *permit club members to continue to borrow one another's weapons during club sessions*. Thirdly, the group were concerned that there should be no ambiguity in the law about the safekeeping requirement for club firearms whether in use or in transit. Such ambiguity would put club members in an

invidious position and jeopardise public safety. The group therefore recommended that *club members should be required to abide by the conditions, including the safekeeping requirement, attached to the club firearms certificate.*

10.20 The working group reported their recommendations to the Committee and we wholeheartedly endorsed them. *We recommend, therefore, that at a suitable opportunity the Home Secretary should propose these changes to the law.*

CHAPTER 11

Summary of Recommendations

Chapter 3: European Commission proposal for Council Directive on the Control of the Acquisition and Possession of Weapons

The Committee recommend that:

- the British Visitor's Permit Scheme should be retained for the foreseeable future (paragraph 3.8)
- efforts should be made to achieve an agreed common European standard of de-activation of firearms (paragraph 3.9)
- the grant of a European Firearms Pass should be the responsibility of chief officers of police who already have experience of administering the domestic firearms licensing system (paragraph 3.10)
- the cost of the grant or renewal of a European Firearms Pass is kept to a minimum (paragraph 3.10)
- dealers are not made liable for the sale of a firearm to a European Community national whose credentials they are unable to verify (paragraph 3.10).

Chapter 4: Control of Explosives Regulations

The Committee recommended that:

- the proposed regulations should make provision for either the automatic grant of an explosives certificate to those already holding a shot gun or firearm certificate, or for explosives certificates to be issued co-terminously with an existing shot gun or firearm certificate without additional investigation (paragraph 4.4)
- the findings of the two reports on the administration of the firearms licensing system by the Association of Chief Police Officers and the British Association for Shooting and Conservation should be taken into account before any scale of fees for an explosives certificate is set (paragraph 4.5)
- the need for wider powers of entry under the proposed regulations should be reconsidered (paragraph 4.7)
- the existing upper limit of 15 kg of gunpowder should be retained (paragraph 4.9)
- black and smokeless powders should be regulated separately (paragraph 4.11)
- further consideration should be given to increasing the existing private use limits for smokeless powder (paragraph 4.11)
- the concerns about the private use limits for smokeless powder and gun powder should also be borne in mind by the Home Secretary in his consideration (paragraph 4.13).

- Chapter 5: Estate Rifles** The Committee recommend that:
- subject to the views of the courts, the notion of “borrow” in terms of section 16 should be construed to include a transaction which is not necessarily gratuitous (paragraph 5.11)
 - section 16 of the Firearms (Amendment) Act should be amended to clarify its scope (paragraph 5.11).

- Chapter 6: Use of Large Magazine Smooth-bore Guns for Clay Pigeon Shooting** The Committee recommend that:
- the Home Office consider amendment of its *Guidance to the Police* to delete the advice that vermin control should normally represent a good reason for the grant of a firearms certificate for a large magazine smooth-bore gun (paragraph 6.13).

- Chapter 7: Computerisation of Dealers’ Registers** The Committee recommend that:
- the law is amended to make it clearly acceptable for dealers to maintain their registers on computer (paragraph 7.10)
 - provision should continue to be made for dealers to keep their registers in manual form if they so choose (paragraph 7.10).

- Chapter 8: Administration of the Firearms Licensing System** The Committee recommend that:
- the Home Secretary should take powers to vary the length of a certificate (paragraph 8.10)
 - the period of validity of certificates should be reviewed (paragraph 8.10)
 - both the ACPO and BASC studies into the administration of the firearms licensing system should be examined by the Home Secretary with a view to the formulation of a best practice model of current practices, on which an assessment of appropriate levels for fees can be based (paragraph 8.12)
 - section 54 of the Firearms Act 1968 should be extended to allow civilians employed by police authorities to be in possession of firearms in the course of their duties (paragraph 8.13).

- Chapter 9: Air and Gas Powered Weapons** The Committee recommend that:
- tightening of the present controls on air weapons would not reduce air weapon misuse to any substantial extent (paragraph 9.6)

- low powered CO₂ weapons should be treated in the same way as low powered air weapons and exempted from certificate control (paragraph 9.10).

Chapter 10: Other Issues *Trophies of War*

The Committee recommend that:

- firearms of historic value seized in battle should be made available to interested museums (paragraph 10.1)
- British servicemen might be allowed to keep firearms seized during battle provided that they have been submitted for a process of de-activation to a recognised standard (paragraph 10.3).

Working group on target practice

The Committee recommend that:

- the Home Secretary takes a suitable opportunity to propose amendments to the law to reflect the working group's recommendations (paragraph 10.20).

ANNEX A

Firearms (Amendment) Act 1988

Firearms consultative committee

22.—(1) There shall be established in accordance with the provisions of this section a firearms consultative committee consisting of a chairman and not less than twelve other members appointed by the Secretary of State, being persons appearing to him to have knowledge and experience of one or more of the following matters—

- (a) the possession, use or keeping of, or transactions in, firearms;
- (b) weapon technology; and
- (c) the administration or enforcement of the provisions of the principal Act, the Firearms Act 1982 and this Act.

(2) The reference in subsection (1)(a) above to the use of firearms includes in particular a reference to their use for sport or competition.

(3) Subject to subsection (4) below, a member of the committee shall hold and vacate office in accordance with the terms of his appointment.

(4) Any member of the committee may resign by notice in writing to the Secretary of State; and the chairman may by such a notice resign his office as such.

(5) It shall be the function of the committee—

- (a) to keep under review the working of the provisions mentioned in subsection (1)(c) above and to make to the Secretary of State such recommendations as the committee may from time to time think necessary for the improvement of the working of those provisions;
- (b) to make proposals for amending those provisions if it thinks fit; and
- (c) to advise the Secretary of State on any other matter relating to those provisions which he may refer to the committee.

(6) The committee shall in each year make a report on its activities to the Secretary of State who shall lay copies of the report before Parliament.

(7) The Secretary of State may make to members of the committee such payments as he may determine in respect of expenses incurred by them in the performance of their duties.

(8) The committee shall cease to exist at the end of the period of five years beginning with the day on which this section comes into force unless the Secretary of State provides by an order made by statutory instrument for it to continue thereafter, but no such order shall continue the committee for more than three years at a time.

ANNEX B

Biographies of members relevant to their appointment to the Committee

- Mr A E Clarke Served in Regular Army as apprentice and Armourer 1937–62. Civil Service Instructional Officer (Weapons) 1962–73. Chief Inspector Small Arms Kenya Police 1968–73. Retail gunsmith 1973 to date. Represented Regular Army in Inter-Services Matches. Represented Great Britain at Target Rifle Shooting as shooter, coach and Captain. Represented Scotland in three Commonwealth Games. Gold Medallist in 1982. Member of National Rifle Association Council and Executive Committee 1987–90.
- Mr P J Clarke Barrister, Fellow and Tutor in Law and formerly Estates Bursar, Jesus College, Oxford. Co-author of *“The Law Relating to Firearms”*.
- Mrs S Cooper Member of the Great Britain shooting team from 1975 to 1989 in the UIT disciplines of 10 metre crossbow, 10 metre air rifle, 50 metre prone and 3-position rifle, 300 metre prone and 3-position rifle. Competed in European, World and Olympic events, with medals at all levels except Olympic. Current holder of four British records.
- Mr D E J Dracup Solicitor. Chief Crown Prosecutor for South London and Surrey. Formerly Chief Crown Prosecutor for Northumbria and Durham.
- Mr K Drummond QC. Formerly Advocate-Deputy and presently member of the Criminal Injuries Compensation Board. Former Council member UK Practical Shooting Association (UKPSA). Competed in Pistol competitions in UK and abroad. Participates in sporting shooting. Member of British Association for Shooting and Conservation, and British Field Sports Society.
- Mr B Ford Deputy Lieutenant, West Yorkshire. Member of Parliament for Bradford North 1964–83. Vice President of National Rifle Association and British Association for Shooting and Conservation. Chairman of English Shooting Council. Shoots rifle, pistol and clays. National Rifle Association representative to NE Military District. Gunmakers Livery. Chairman Central and Southern Regional Committees, Bradford and Northern Housing Association.
- Mr J L Goddard Head of F8 Division, Home Office.
- Mr B G Hughes Firearms legislation and deer management consultant, deer stalker. Formerly Director Firearms and External Services, BASC. Colonial police officer in Rhodesia (Zimbabwe) followed by 19 years wildlife management, administration,

research and control work culminating in the position of Senior Game Officer, Ministry of Internal Affairs. Held full professional hunters licence. Member BASC and the British Deer Society, Affiliated Member of the Institute of Biology. Extensive big game hunting experience in Africa, also deer stalking and country shooting with small bore rifle and shot gun in Britain.

Dr I Oliver Chief Constable, Grampian Police.

Mr D J Penn Keeper, Exhibit and Firearms, Imperial War Museum. Fellow of the Society of Antiquaries. Freeman of the Worshipful Company of Gunmakers. Office holder in National Pistol Association, Muzzle Loaders Association of Great Britain and Historical Breechloading Smallarms Association. Member, British Shooting Sports Council, Arms and Armour Society and National Rifle Association. Has represented Oxford University and County of London in pistol shooting. Also shoots rifle and shot gun.

Mr R J Pitcher Special Investigation Branch, Royal Military Police to 1984. Branch Proof Master, The Worshipful Company of Gunmakers, Royal Small Arms Factory, Enfield to 1986. Proof Master, The Worshipful Company of Gunmakers, London, and head of British delegation to the Commission of International Proof. Pistol shot and rough shooter.

Mr P B Roberts Chairman and Chief Executive of John Rigby & Co Gunmakers. Chairman, Gun Trade Association 1986. Member of Worshipful Company of Gunmakers 1980. Member of Game Conservancy, British Deer Society and Safari Club International, Shikar Club. Experience in big game hunting in Africa and Asia, deer stalking in Scotland and England, all types of game shooting in Britain and on the Continent.

Mr P Russell Head of Police Division, Scottish Office.

Mrs P Schroder Shot gun and sporting rifle shot in Great Britain and abroad. Match Rifle competitor. Has represented Great Britain in Match Rifle events in the United States. Represents Ireland in the annual Elcho Match, Bisley. Vice-President of the Oxford University Rifle Club. Elected member of the Cambridge Long Range Rifle Club. Life member of the National Rifle Association.

Mr J Sharples Chief Constable, Merseyside Police. Chairman of the Association of Chief Police Officers' Crime Committee Sub-Group on the Administration of Firearms and member of the Crime and Terrorism and Allied Matters Committees.

- Mr J R Ward Involved with ballistics whilst serving in the Armed Forces (RASC, RE, RA, RAF, REME). Ran family gun business for 36 years. Held various offices in the Clay Pigeon Shooting Association. Currently President of the Association. Chairman of Bisley Gun Club. Member of the British Shooting Sports Council and of the Gun Trade Association.
- Mr T Warlow Head of Home Office National Firearms Forensic Service, Forensic Science Services Laboratory, Huntingdon. An active shooter for most of his life with experience in muzzle-loading, air weapons, rifle and pistol target shooting, game shooting, deerstalking, wild fowling and clay pigeon shooting.

ANNEX C

List of topics from which 1990 to 1991 work programme was drawn

- * Validity of certificates and co-terminous certificates
- * Administration of the firearms licensing system
- * EC Directive
 - Definition of a component part
- * Good reason for possession of a shot gun
 - Minimum age for possession of a shot gun
- * Specifications for the adaptation of shot gun magazines and the de-activation of firearms
 - Firearms Law: Guidance to the Police
 - Numbering of unmarked guns
- * Purchase of shot gun ammunition
 - Exemption from the certification process for carbon dioxide powered weapons
 - Antique weapons
- * Included in work programme for 1990–91.

List of topics carried over from last year

- EC Directive
- Estate rifles
- Use of large magazine smooth-bore guns for clay pigeon shooting
- Computerisation of dealers' registers

ANNEX D

News Release: Firearms Consultative Committee programme of work for 1990 to 1991

Lord Kimball, Chairman of the Firearms Consultative Committee, today announced the Committee's programme of work for the coming year.

In addition to any matters referred to it by the Secretary of State for advice, the Committee will be giving detailed consideration to a number of varied subjects listed below. The Committee will also take on board for consideration matters raised by shooting organisations and members of the public which disclose major issues of national importance to the shooting community.

Programme of work

Validity of certificates and co-terminous certificates
Administration of the firearms licensing system
EC Directive
Estate Rifles
Use of large magazine smooth-bore guns for clay pigeon shooting
Computerisation of dealers' registers
Purchase of shot gun ammunition
Good reason for possession of a shot gun
Specifications for adaptation of shot gun magazines and the de-activation of firearms.

Anyone wishing to make representations to the Committee should address these in writing to the Secretary to the Firearms Consultative Committee, 50 Queen Anne's Gate, London SW1.

In announcing the programme of work Lord Kimball said:

“The Committee is now well into its stride. We have set ourselves a strenuous programme of work for the coming year during which we will be tackling major issues of importance including the administration of the firearms licensing system and the length of certificates.”

ANNEX E

The proposed EC Directive on Control of the Acquisition and Possession of Weapons: Submission to Sub-Committee E of the Select Committee on the European Communities

The Firearms Consultative Committee notes that this Directive which the European Commission has produced as part of its plan for the creation of the single market has a long history and that it has already been subjected to wide ranging scrutiny and amendment in the light of the considered opinions of the member countries' governments, the trade and gun-owning interests.

The primary aim of the Directive is to enable Member States to abstain from carrying out controls on the possession of weapons at internal Community borders and to facilitate the free movement of hunters and marksmen. The Commission has rejected all amendments at variance with these objectives. The Directive provides compensatory measures in the form of partial harmonisation of Member States' national firearms legislation and a notification and information exchange scheme. As a matter of principle the Committee would support the introduction of minimum standards by Member States with a view to full harmonisation in the longer term, if this is achievable.

The Committee is concerned that proper emphasis should be placed on the need to safeguard the interests of the vast majority of persons who own firearms and use them lawfully and safely in pursuit of their work or sport. The legal firearm owner will obey the law because he wishes to pursue his sport overtly. Criminals and terrorists will on the other hand have no regard for it. The main impact of the Directive will, therefore, fall on the legitimate shooters within Member States and will do little to deter the criminal or terrorist intent on his nefarious deeds. The Committee recognises that in the United Kingdom we have a particular problem of security which even in the longer term might require more stringent domestic provisions.

The Committee's first concern is with the use of Article 100A as the legal base for this proposal. As one of the primary aims of the Directive is to facilitate the free movement of persons carrying firearms as part of their personal baggage the Committee considers that the Directive should more properly be founded on Article 100 or Article 235 or both.

The Committee's second concern relates to Article 15 of the Directive. This requires the intensification of controls on the possession of weapons at external borders, and precludes such

controls being made at internal borders except when boarding a means of transport. Accordingly, reliance on checks at external borders will be possible only if each Member State is aware and able to take cognisance of the laws and provisions of all Member States when carrying out these checks. Otherwise, the Community will only be as strong as its weakest link.

The Committee's third concern relates to the special exemption in Article 12(2) which will allow huntsmen and sportsmen to bring personal firearms in categories C and D of the Directive into this country on the basis of a European Firearms Pass (EFP) without prior authorisation. The Committee fully accepts there is a need for legitimate shooters to be able to pursue their sport freely and to move within the Community without unnecessary restriction or hindrance. The Committee broadly welcomes the creation of the EFP. However, the Committee notes that the arrangements in Article 12(2) relating to Category C and D weapons would conflict with the existing provisions of the British Visitors Permit Scheme introduced by the Firearms (Amendment) Act 1988.

There are several other aspects of policy about which the Committee would wish to express concern. These include the arbitrary age limit of 18 for the issue of an EFP (Article 5), the likelihood of increases in bureaucratic control (Articles 11, 12 and 13) and that Articles 9 and 10 would spell the end of the estate rifle provision in the Firearms (Amendment) Act 1988, which allows a person, without a firearms certificate, to borrow and use a rifle in the certificate holder's presence. The Committee is also concerned that the precise meaning of several Articles in the Directive is unclear because of ambiguity in its drafting. For example, it is not clear whether a person who has been granted a EFP may legally take ammunition with him on his travels.

The Committee is encouraged that the Directive will do something to prevent the "impulse buyer" from casually obtaining a gun abroad, importing it illegally without too much fear of being caught (if he avoids air transport), and then not knowing what to do with it, storing it insecurely, and possibly being tempted to sell it illegally.

On balance the Committee has concluded that adoption of the proposed Directive would not undermine public safety in the UK greatly by an influx of illicit firearms in the hands of undesirable or irresponsible persons, but might be seen as complementing existing domestic controls in a modest way. It

will not stop crime, but neither will it facilitate it. Its worst aspect, financially, is the cost of the proposed information exchange arrangements, and the possibly significant impact of a central clearing house on the administration of the law within the United Kingdom.

ANNEX F

The proposed EC Directive on the Control of the Acquisition and Possession of Weapons: Letter to the Home Secretary

The First Annual Report of the Firearms Consultative Committee laid before Parliament in July of this year, indicated that the European Commission's proposal for a Directive on the Control of the Acquisition and Possession of Weapons would form a prominent part of the Committee's current programme of work.

In the normal course, the outcome of the Committee's deliberations and any advice it might wish to offer on this matter would be submitted to you within the context of the Committee's next Annual Report. But in view of the speed at which negotiations in the European forum are taking place, I thought it right to ask the Firearms Consultative Committee to expedite its consideration of this technically difficult and far-reaching draft Directive so that its advice could be conveyed to you within the time frame scheduled by the Council.

The Committee met on 5 December to examine the proposal further in the light of the latest position reached in negotiations in the Council, as reported in the debate in the House of Commons on 29 November. My purpose in writing to you is to advise you of the outcome of our discussion.

The Committee notes that the proposed Directive has a long history and that it has already been subjected to wide ranging scrutiny and amendment in the light of the considered opinions of member countries' governments, the trade and gun-owning interests. The Committee further notes that substantial improvements have been proposed to the text of the draft Directive by the United Kingdom and other Member States and that these have been taken on board by the European Commission. The amendments which have been signalled to the various Articles in the proposed Directive go a considerable way towards removing the difficulties, both of policy and practice which the Firearms Consultative Committee perceived in the original text, and happily enables us to remove any fundamental objections which we might have otherwise had to the adoption of the Directive.

That said, the Firearms Consultative Committee considers that there remain a relatively small number of aspects about the Directive which give rise to a degree of concern. First, while the Committee broadly welcomes the concept of a European Firearms Pass in the arrangements set out in the draft Directive for the movement of Community nationals travelling with firearms as part of their personal baggage, it strongly believes that the British visitor's permit system introduced

under the Firearms (Amendment) Act 1988 should be retained for the foreseeable future to ensure public safety and security in this country.

The Committee is also concerned about the administrative burdens which the issue of a European Firearms Pass might impose on the licensing authority and shooting community alike. It therefore recommends that the grant of a European Firearms Pass should be the responsibility of chief officers of police who already have experience of administering the domestic firearms licensing system. Furthermore, it is important that any cost to the shooting community arising from the grant or renewal of a European Firearms Pass should be kept to the minimum.

In its discussion of the draft Directive, the Committee paid careful regard to the arrangements proposed for the movement of weapons within the Community by way of commercial trade. It notes that an additional provision is to be added to Article 2 so that the proposed Directive will not apply to commercial trade in military equipment. This being the case, the Committee does not see any great difficulty with the Commission's proposals. However, it is concerned about the position of registered firearms dealers being able to know that the sale of a firearm to a Community national resident outside the United Kingdom is permitted by the latter's Member State. The Committee recommends therefore that this matter be given further urgent consideration to ensure that dealers in this country are not made liable in any way for the unauthorised sale of a firearm to a person whose credentials they are unable to verify.

Lastly, the Committee expressed considerable concern about the movement of weapons and ammunition within the Community which have undergone a process of de-activation less stringent than that specified in domestic firearms law. The Committee is particularly concerned that firearms collectors or members of the public who return to the UK with a weapon or ammunition bought in the Community, which they believe to be de-activated—and which has indeed undergone a process of de-activation—may nevertheless find themselves held to be criminally liable because the weapon in question is considered under British law to be a firearm and subject to control.

The Committee also regards poorly de-activated weapons as posing a grave risk to public safety since they could be easily re-activated without specialised knowledge for use by the criminal fraternity. The Firearms Consultative Committee therefore recommends that this potentially serious problem be

considered in the appropriate European forum as a matter of urgency. The Committee considers it imperative for Member States to agree a common standard of de-activation for weapons and ammunition based on a level of control akin to that prescribed in section 8 of the Firearms (Amendment) Act 1988 to ensure that weapons and ammunition classified in the Community as de-activated do not in any way pose a risk to public safety or the peace.

ANNEX G

The Association of Chief Police Officers Crime Committee Working Group on the Administration of Firearms: Summary of Recommendations

It is recommended that each force moves toward a centralised Firearms Registry to control the enquiry, administrative and decision making processes.

It is recommended that all initial grant applications be thoroughly investigated.

It is recommended that the National Crime Prevention Centre at Staffordshire, in conjunction with the ACPO Crime Committee and the Home Office, produce an information guide on the security of firearms and shot guns for all forces.

It is recommended that the information guide on the security of firearms and shot guns be made available to police and public alike.

It is recommended that when security is viewed, a record be made not only of the suitability but also of the potential capacity of the security arrangements.

It is recommended that certificate holders be notified at least four weeks in advance of the need to make application for renewal.

It is recommended that forces assess the benefits derived from home visits and consider adopting a postal renewal system, which, where appropriate, may be supplemented by home visits.

It is recommended that Firearms Registries operate a screening, filtering and prioritising system to determine the category of enquiry necessary and that all telephone and correspondence enquiries, where possible, be dealt with centrally.

It is recommended that permits under section 7 of the 1968 Act be issued in cases where delay in processing applications may result in applicants holding firearms or shot guns without lawful authority.

It is recommended that nominated trained staff be used to deal with enquiries.

It is recommended that, where appropriate, certificate holders be encouraged to take advantage of the co-terminous provisions contained in the 1988 Act.

It is recommended that wherever possible, enquiry staff report directly to the firearms registry.

It is recommended that chief officers delegate authority where appropriate to authorised officers without detriment to his statutory responsibilities.

It is recommended that details of all firearm and shot gun certificate holders be kept in the form of a nominal index at a strategic location and a speedy communications system be established to pass information to patrol officers.

It is further recommended that the Police National Computer (PNC) 2 options relative to firearms applications be pursued by ACPO as a matter of some urgency.

It is recommended that consideration be given to the development of interactive computer systems to improve inter-force liaison relative to firearms administration.

It is recommended that consideration be given to abolishing the requirement for an application to be countersigned.

It is recommended, subject to the considerations outlined, that the period of validity of firearm and shot gun certificates be increased to five years.

It is recommended that legislation be amended to allow for the revocation of visitors' permits in appropriate circumstances.

It is recommended that the exemption under section 54 be extended to include civilian employees of Police Authorities.

It is recommended that consideration be given to amending legislation to permit firearms dealers' registers to be computerised.

It is recommended that forms 101 and 103 be amended to require applicants to declare only offences for which they have been convicted since the date the certificate was issued or last renewed.

It is recommended that the standard fee be charged for the grant or renewal of *ALL* firearm certificates.

Subject to the outcome of any legal opinion, it is recommended that fees should not be refunded in the case of an application for the grant or renewal of a certificate that is refused.

ANNEX H

The Capture of Firearms by United Kingdom Forces during War: Letter to the Armed Forces Minister

Now that the splendid victory secured by the Allied forces means that the Gulf conflict is drawing to a close I thought I would take the opportunity to write to you in my capacity as the chairman of the Firearms Consultative Committee about UK policy for the disposal of firearms captured by British Forces during the military campaign.

I should first of all explain that the Firearms Consultative Committee's main responsibility lies in the workings and administration of the UK's domestic firearms legislation. In a recent meeting, however, the possibility of seized enemy weapons entering the United Kingdom in the possession of serving military personnel was raised. Concern was expressed about how these weapons might be retained legitimately so as to avoid any possibility of lethal weapons falling into the wrong or irresponsible hands, and so jeopardising public safety. My purpose in writing to you, therefore, is to advise you of the outcome of our discussion in view of the present position in the Gulf.

I understand that the current position is that any items of enemy military equipment seized in battle become the property of the capturing nation and not the individual. Only military equipment abandoned by the enemy which is unserviceable, not of a personal nature, and does not constitute a hazard to movement may be permitted as a souvenir provided that it also complies with HM Customs importation regulations. Accordingly all firearms seized from the enemy become Government property and their retention is not permitted.

The Committee's concern about this is that, in view of past experience, individuals will attempt to bring back into the United Kingdom a wide variety of items seized during battle, some of which may include firearms. It therefore suggests that the current policy on the disposal of equipment seized from the enemy during war, as it applies to firearms, should be varied to allow service personnel, on return to the UK, to submit such weapons for a process of de-activation to a recognised standard and to subsequently gain ownership of the weapons, in their de-activated state and keep them as souvenirs.

The Committee considered that such an arrangement would avert the recognisable danger of weapons, carried by returning servicemen entering the UK and being stored illegally. In its discussion the Committee paid careful regard to the results of recent domestic firearms amnesties which suggest that the

consequences of the imposition of stringent controls or prohibition of firearms is the disappearance of an unquantifiable number of weapons underground. The Committee is also clearly concerned about the potential risk that illegally held weapons might pose to the public safety or the peace.

Finally, the Committee is encouraged by the current policy which allows equipment of historic value, seized in battle, to be gifted to museums or to individual units as exhibits, trophies or for display. The Committee suggests that any such firearms which may be of interest to the national heritage should be gifted to museums in the National Museum Consortium which have a particular interest in the history of firearms, such as the Imperial War Museum.

ANNEX I

Organisations and other interested parties which have submitted representations

1. Association of Chief Police Officers Crime Committee
2. Association of County Councils
3. Association of Metropolitan Authorities
4. The British Association for Shooting & Conservation
5. The British Deer Society
6. The British Shooting Sports Council
7. The Clay Pigeon Shooting Association
8. Greater Manchester Police Authority
9. Kelsey Computers Limited
10. The National Pistol Association
11. The National Rifle Association
12. The National Small-Bore Rifle Association
13. The National Target Shooting Association of Ireland
14. The Police Federation of England and Wales, Joint Central Committee
15. The Scottish Home and Health Department
16. The Scottish Landowners' Federation
17. The Sheffield Association of Shooting Clubs
18. The Shooting Foundation
19. The Shooters' Rights Association
20. The Shooting Sports Trust Limited
21. St Austell Rifle and Pistol Club
22. Thornlands Shooting Centre Limited

In addition, the Committee has received a large number of representations from individuals.

ANNEX J

List of Publications referred to in the Report

Firearms Act 1968	HMSO ISBN 0 11 802339
Firearms Act 1982	HMSO ISBN 0 10 5431826
Firearms (Amendment) Act 1988	HMSO ISBN 0 10 5445886
Firearms (Dangerous Air Weapons) Rules 1969	HMSO ISBN 0 11 0900472
Firearms Rules 1989	HMSO ISBN 0 11 0968549
Firearms Law: Guidance to the Police	HMSO ISBN 0 11 3409035

Health and Safety Commission: Proposed Control of
Explosives Regulations: Consultative Document.

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