



MINISTRY OF DEFENCE

Defence Land Ranges Safety Committee
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See Distribution

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RANGE SAFETY POLICY LETTER 13/02– CIVILIAN USE OF MoD RANGES

Reference:

A. JSP 403 – Handbook of Defence Land Ranges Safety Volume 1 – Range Management.

Background

1. Following legal advice, some adjustment is required to the policy in Reference A for civilian use of MoD ranges. With immediate effect, the following rules will apply.

Introduction

2. Competitive target shooting as a sport in the UK is broadly split into three categories: Rifle, Pistol and Shotgun. The aim of this letter is to give clear guidance for the use of Land Ranges by organisations other than MoD Armed Forces including Ministry of Defence Police, hereafter referred to in general terms as “Non MoD Organisations” (NMOs). Acknowledging that not all MoD ranges are at this time provided and administered by a single organisation, as a generalisation the “Range Authority” to which the NMO is required to demonstrate compliance with the direction given in this letter is the RAU.

General

3. The policy and process of recognition of sporting activities and associated NGBs of sport is overseen by the four Sports Councils (Sport England, Sport Northern Ireland, Sport Scotland and Sport Wales) and UK Sport. NGBs of sport are typically private organisations, which provide a single lead NGB structure at UK, GB, or Home Country level that satisfies published criteria on governance related issues and structures. In respect of competitive target shooting, NGBs govern a particular discipline through the common consent of the sport itself and they provide a range of training courses on safe conduct and safe supervision of range practices within their respective sporting disciplines. Recognition as an NGB is an acknowledgement of this situation and does not in itself confer additional authority or rights; however, the MoD acknowledges that each of them have a nationally recognized status as being the centre of excellence for each of their respective disciplines. The principal NGBs recognised by the MoD are:

- a. The National Rifle Association (NRA), which is the NGB for full-bore target shooting. The rifles used in full-bore competitions typically have a 7.62mm calibre, and are single shot rifles.
 - b. The National Small-Bore Rifle Association (NSRA) which is the NGB for all Small-bore Rifle and Pistol Target Shooting in the United Kingdom, including Airgun and Match Crossbow Shooting. The weapons used in small-bore competitions are typically of .22 calibre or less.
 - c. The Clay Pigeon Shooting Association of Great Britain (CPSA) and the United Kingdom Practical Shooting Association (UKPSA) are both NGBs for shotgun target shooting.
 - d. The Muzzle Loaders Association of Great Britain (MLAGB) which is the NGB for black powder muzzle loading firearms, for target shooting.
4. The conditions under which those NMOs which are formally approved civilian clubs, affiliated to their appropriate NGB, may use Service, DE&S, Dstl, MDP, DTE or RFCA controlled ranges (collectively referred to in this section as MoD Land Ranges) in the UK are set out in this section.
5. **Eligibility.** To be eligible to use a MoD land range, a civilian club must apply for a MoD Licence - DIO Form 5665.

Additionally, they must:

- a. Be approved by the Home Office for the calibre of firearms they intend to use on MoD ranges and must be able to produce written confirmation from the Home Office to that effect. (Application for the Secretary of State or Scottish Ministers' approval is made on Form 124, which is available from any of the principal NGBs). Approval is granted in a Letter of Approval, which is sent to the applicant and copied to the Chief Officer of Police.
- b. Be affiliated to the appropriate NGB at paragraph 3 above and must be able to produce written confirmation that its affiliation fees are paid.
- c. Provide evidence of valid insurance cover (see paragraph 7 below).
- d. Be able to provide a NGB qualified Range Conducting Officer (RCO) for each range to be used who is competent on the calibre of weapon and proposed activity to be conducted. The RAU is to hold a list of current RCOs together with their expiry date and a list of weapons they are qualified to conduct practices for (for further detail see paragraph 20).
- e. Ensure that Full Members possess and are able to produce valid membership cards confirming their Club Chairman's certification of their competence on their individual weapon type. This is managed at Club Level but is validated, assured and supervised by the NGB who define the processes to be used to issue the Certificates of Competence. A number of disciplines carry the same descriptive but

it is the calibre that dictates which NGB is responsible for the specific discipline when issuing Certificates of Competence.

f. Ensure that any Probationary Members are supervised on a one-to-one at all times by either a Full Member of the club who is authorised by the Chairman of the club or by a NGB trained and certified instructor or coach.

g. Adhere to the Safe Shooting System (SSS), for full bore shooting which is detailed at Annex A. This SSS has been adopted by the MoD as best practice for full bore shooting on MoD Ranges.

6. **Licence to use MoD Range – DIO Form 5665.** NMOs wishing to use a MoD land range should apply to the appropriate RAU for a Licence for the range(s) they wish to use. Application for a MoD Licence is made on the Form at Annex A. The RAU should be consulted regarding any special requirements that may need to be included in the Licence. The RAU is to ensure that any Licences they issue are copied to their regional office.

7. **Indemnity and Insurance.** The MoD must be fully indemnified against all damage to the premises and claims from third parties for personal injury or death resulting from the licensee's use of a range. In addition to the signed indemnity contained in the licence, DIO Form 5665, it is necessary that the NMO provides evidence of insurance cover to support the indemnity. The insurance cover required to meet third party claims will be a minimum of £5M per incident and be unlimited as to the total number of incidents it covers.

8. **Payment.** NMOs will be required to pay for the use of MoD land ranges. Charges will be set by the MoD in agreement with the RAU.

9. **Weapon Restrictions.** Use of Non-Service Pattern Weapons and ammunition which are not within the parameters laid down in the relevant range MoD Form 904 will not be permitted. Civilian clubs are not permitted to use any automatic weapon system on MoD land ranges.

10. **Ammunition Restrictions.** All Civilian clubs that use hand loaded ammunition are to ensure that it falls within the parameters for use on MoD ranges. Civilian clubs are not permitted to fire tracer ammunition.

11. **Priority.** At all times the use of MoD land ranges by civilian clubs is to be subject to the requirements of the Services (which includes Reserve Forces and Cadets on duty) and Police Forces on official marksmanship or tactical training, all of which take priority.

12. **Conditions of Use.** It is essential that NMOs observe the safety regulations and procedures, which are required by the Range SO for use of the range, including the adoption of any 'clear RDA procedure'. In particular, the following points are to be noted:

a. If a range is covered by Military Byelaws, NMOs using the range cannot enforce the byelaws by means of either arrest or removal if an individual enters the danger area either inadvertently or deliberately.

b. NMOs may not apply the 200 mils reduction in safety angle (see 'Safety Angle Reduction' definition in Volume IV). When civilian clubs are firing on an adjacent range, MOD users of a Gallery range may not apply the reduction either.

13. **Dispensation Range.** NMOs are permitted to use a MOD range which operates under a 2* dispensation provided the 2* RAO who granted the initial dispensation because of a Service/Agency need is satisfied, as a result of a risk assessment and any subsequent controls put in place, that the level of risk from the NMO use is no greater than on a Compliant Range. Where there are controls and limitations or restrictions to be applied to the NMO these must be detailed on the schedule of the MoD Form 904 for the range and included in the Range Standing Orders. They are likely to include, inter alia, the standard of marksmanship required, the level of safety supervision required, distances and lanes, which can be used, number of firers and the maximum calibre, muzzle velocity and muzzle energy permitted. The fact that one named club is authorised to use a certain Dispensation Range does not mean that other clubs automatically have the same permission. Each case is to be assessed individually and only named clubs that hold a valid MoD Licence (DIO Form 5665) are to be authorised.

14. **Shared ranges.** Only bids to use a range from a single organisation will be permitted by the RAU i.e. Cadets may not share ranges with civilian gun clubs except when shooting in competitions on duty using service pattern weapons.

15. **Club Agreement and Order Form.** The civilian club is to liaise with the RAU to ensure that the Club Agreement and Order Form are completed correctly.

16. **Actions on an accident.** The RAU is to ensure that the RSOs contain sufficient detail to prevent unlawful possession of firearms and authorise specific Crown Servants to take possession of any weapon involved in an incident or accident where appropriate.

17. **Cooperation with any investigation.** RAUs are to ensure that the RSOs contain guidance on the procedure to be adopted in the event of an incident or accident to initiate collection of relevant material immediately following an incident and the appropriate NGB is to have in place a formal agreement that their affiliated civilian club will agree to and support the MoD closest cooperation with any investigation where they are involved with a range accident.

18. **Range Documentation.** Whenever a police or civilian club uses a MoD land range it is the responsibility of the RAU controlling the range, or, in the case of DE&S (contractor operated) ranges, the TSM, to ensure that the MoD Form 906/906A/906B is correctly completed before and after firing.

19. **Other NMO. Civil police marksmanship and tactical training certification.** The Association of Chief Police Officers (ACPO) of England, Wales and Northern Ireland has agreed that members of their police forces nominated to conduct live firing on a MoD range will hold a certificate, issued by the Chief Constable in charge of one of the Firearms Training Centres licensed to deliver the National Firearms Instructors Course (NFIC). The certificate will state that the named police officer has successfully completed a course to qualify him to conduct the appropriate range practices. Similar arrangements apply to civil police forces covered by ACPO for Scotland. A police force using a MoD range is required

to provide the RAU with a list of officers qualified to conduct the appropriate range practices.

20. **Civilian RCO – Civilian rifle clubs.** To ensure safe conduct live fire practices by the membership of a civilian club, the Chairman is to appoint a current RCO who has been formally qualified on the appropriate NMO RCO course to conduct the Clubs shooting and to exercise the Chairman's responsibility for ensuring safe conduct of the practice by the membership. The procedure and qualification requirements for civilians to exercise the full responsibilities of a civilian club RCO on MoD land ranges are as follows:

- a. Club Chairmen wishing members of their club to use a MoD range will nominate to the appropriate NGB (paragraph 3) members who they consider are competent to be RCOs by way of any previous qualification or experience.
- b. Upon the recommendation of the Club Chairman the appropriate NGB will, if satisfied, issue to the club a certificate listing by name those members which they accept as being competent to conduct the standard firing practices listed in the rules of the appropriate NGB together with an NGB RCO card giving the details of the practices the RCO is eligible to conduct. On receipt of the certificate, the secretary of the club concerned will forward a copy, signed by each authorised RCO, to the RAU and issue each RCO with a "MoD RCO Card".
- c. The RCO must be in possession of both an in date NGB RCO card and an MoD RCO card identifying the individual by name and their qualification to conduct firing practices.
- d. RCO's are deemed qualified if they have:
 - (i) Current or former military service (who has not left the service for more than 2 years), either regular or reserve, through which an appropriate military RCO qualification has been achieved.or
 - (ii) Achieved a satisfactory standard on the appropriate NGB course.

21. **High Muzzle Energy Weapons.** In addition to the guidance in paragraph 20 relating to RCOs of civilian rifle clubs specific additional direction relating to the firing of non-standard firearms which might or will produce high muzzle energy such as those shooting C and F Class rifles or those fired by the members of the British Sporting Rifle Club may be found at Appendix 1 to Annex B of Reference A.

22. **NMO who are Civilian contractors.** Once a formal written authority to use a MoD range has been given by the HQ of the RAO, a civilian contractor is responsible, in accordance with that authority, for the safe conduct of firing practices.

- a. Before a civilian contractor takes responsibility for the safe conduct of firing practices on a range he must be, or must provide proof of qualification and competency to the RAU that the nominated person is competent to act as the RCO. The criteria for qualification are either of the following:

(i) Current or former military service, (who has not left the service for more than 2 years) either regular or reserve, through which an appropriate military RCO qualification has been achieved.

or

(ii) Achieving a satisfactory standard on the appropriate Service or MoD agency course.

23. **MoD land ranges - shotgun shooting.** Military Shotgun Shooting as specified in writing by the Service Competent Authority may be carried out on any suitable range using Service issue shotguns and ammunition providing this has been authorised by the RAO.

24. NMO who are **Clay Pigeon, Clay Target and Practical Shotgun Shooting.** MoD, Service, and civilian clubs may use MoD land ranges and training areas for this type of shooting with privately owned shotguns and ammunition provided that:

a. **RCO.** Clubs provide an RCO who is certified by the officer in charge of the club as having qualified on the appropriate course, the Services Clay Target Shooting Association (SCTSA), the British Association for Shooting and Conservation (BASC) or the UK Practical Shooting Association (UKPSA) Safety Officer's Course.

b. **RCO Certificate of Authorisation.** A certificate for each authorised RCO is lodged by the club with the RAU and the certificate is signed by the CO of the RAU. The club is to notify the RAU of the RCO's name on each occasion before the club fires and the RAU is also to check the RCO's credentials.

c. **Conduct.** The conduct of shooting practices is in accordance with the appropriate Associations regulations, which may be modified as necessary by a Service Association for its use.

25. **Duty Status.** MoD and Service clubs where the members are on duty must ensure their CO publishes their activities as official in appropriate routine orders to give 'on duty' status.

26. **Individuals.** MoD personnel and civilians, as individuals, may use privately owned shotguns for game and vermin shooting on MOD land ranges and training areas with the permission of the CO of the RAU. MoD personnel may also carry out vermin shooting as a duty using Service issue shotguns and ammunition. In all cases, the CO of the RAU is responsible for ensuring that the activity is conducted safely and that each person using a privately owned shotgun is in possession of a current shotgun certificate and has adequate third party insurance.

27. **Licensing.** Game shooting on MoD land ranges and training areas is to be licensed by the regional RAU office in accordance with JSP 362 – Defence Lands Handbook, Chapter 15 - Public Use of Mod Property for Social, Recreational or Commercial Purposes. Club members and individuals must be in possession of a valid shotgun certificate. These requirements do not apply for military shotgun shooting (paragraph 23

above) or for vermin shooting carried out as a duty using Service issue weapons and ammunition (paragraph 26 above).

Dissemination

28. In due course, the contents of this policy letter will be incorporated into Reference A. In the meantime, the policy is effective from the issue of this letter.

29. Duty holders represented on the DLRSC are requested to cascade the policy and guidance in this letter through their chains of command to all Range Authorising Officers and Range Administering Units likely to be affected by it. This policy letter will also be distributed to all holders of Reference A through the Defence Munitions Centre and will be placed on the Defence Intranet/Internet website for viewing alongside JSP 403.

(Original Signed)

BP O'Callaghan
Secretary DLRSC

Annex A : Club Agreement and Order Form

Distribution:

HQ BF Cyprus - J3
HQ BF Gibraltar - J3
HQ BF South Atlantic Islands - J3
FLEET - NTE AW
HQ LAND CESO(A) - Trg Safety
HQ AIR - A4 ES
DSTL - ECO
DIO Ops – SO1 Trg Safety
DSG - Hd HS&EP
MDP – FFTO
NRA
NSRA
CPSA
UKPSA
MLAGB
DSEA DOSR TL
Ch RSIT (A)
RNRSO
College of Policing

Chapter 3 Annex C

Club Agreement and Order Form

<i>Club Name</i>	<i>Club affiliation no.</i>

Club agreement for the use of MoD ranges

As Chairman of the club named above, I agree that:

- Our club will follow the NGB Safe Shooting System.
- I will annually certify all members who request to be certified and who I judge to be safe and competent.
- I will ensure that anyone shooting with the Club holds a valid certificate from a club affiliated to the NGB except in the case of Probationary members or those listed in Appendix 3 to the MoD agreement.
- Any new members to our club will complete the NGB probationary training course (either run by the NGB or by ourselves). If our club wants to use our own course, we will apply for accreditation by the NGB.
- I will maintain adequate records of our training and certification systems for possible audit by the NGB or MoD.
- I will ensure that all hand loaded ammunition falls within the parameters for use on MoD ranges
- I agree that our club will take part in any investigation conducted jointly by the NGB and the MoD following an incident on a MoD range and will require our members to assist fully in any such investigation.

Signature: