

Impact Assessment, The Home Office					
Title: Regulation of Miniature Rifle Ranges IA No: HO0350 RPC Reference No: N/A Other departments or agencies: N/A			Date: 10 May 2022		
			Stage: FINAL		
			Intervention: Domestic		
			Measure: Primary legislation		
			Enquiries: Firearms Policy Unit public.enquiries@homeoffice.gov.uk		
RPC Opinion: N/A		Business Impact Target: Non-qualifying regulatory provision			
Cost of Preferred (or more likely) Option (in 2021/22 prices)					
Net Present Social Value NPSV (£m)	-0.09	Business Net Present Value BNPV (£m)	-0.07	Net cost to business per year EANDCB (£m)	0.01
What is the problem under consideration? Why is government intervention necessary? Section 11(4) of the Firearms Act 1968 allows a person to run a rifle range or shooting gallery where only miniature rifles not exceeding .23-inch calibre or air weapons are used, without the need for a firearms certificate. Intervention is necessary as there is a risk that the exemption could enable unsuitable people to acquire firearms. The definition of a 'miniature rifle' needs to be clarified.					
What is the strategic objective? What are the main policy objectives and intended effects? The strategic objective is to reduce crime. The policy objectives are to require operators of miniature rifle ranges to possess a firearms certificate so that they are subject to police suitability checks and also to clarify the definition of a miniature rifle. The intended effects are to increase public safety and a clarification of the law in respect of the type of firearm used on miniature rifle range.					
What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base) Option 1: 'Do nothing' and continue without strengthening miniature rifle range regulations. Option 2: Require operators of miniature rifle ranges to possess a firearms certificate, and clarify the definition of a miniature rifle. This is the Government's preferred option. Non-regulatory options were considered but as firearms are a regulated environment, therefore none of these options met the objectives nor could provide the intended effects.					
Main assumptions/sensitivities and economic/analytical risks				Discount rate (%)	3.5
It is assumed that around half of miniature rifle range operators would need to apply for a new firearm certificate. This proportion may be higher or lower in practice, which would affect the total costs incurred to operators. Low, central and high estimates have therefore been used.					
Will the policy be reviewed? It will be reviewed. If applicable, set review date: 10/2026					

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

Signed by the responsible Minister:  Date: 2022

Summary: Analysis & Evidence

Policy Option 2

Description: Regulation of Miniature Rifle Ranges

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2021/22	PV Base	2021/22	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-0.01	High:	-0.27	Best:	-0.09	Best BNPV	-0.07	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.01	0.02	0.03	0.00	0.02
High	0.14	0.30	0.43	0.04	0.16
Best Estimate	0.05	0.10	0.16	0.02	0.07

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

The transition costs associated with familiarisation, variations and new certificates are estimated to be between **£0.01** and **£0.14 million**, with a central estimate of **£0.05 million** (2021/22 prices). Ongoing costs of renewing firearm certificates, medical fees, police processing costs and General Practitioner (GP) processing costs are estimated in a range of **£0.02** to **£0.3 million (PV)**, with a central estimate of **£0.1 million (PV)** over 10 years. Total costs are estimated in a range of **£0.03** to **£0.43 million (PV)**, with a central estimate of **£0.16 million (PV)** over 10 years.

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

There are no other expected non-monetised costs.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.01	0.01	0.02	0.00	0.0
High	0.05	0.09	0.14	0.01	0.0
Best Estimate	0.03	0.04	0.06	0.01	0.0

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

There is a benefit to the police from fees charged for new firearm certificates or variations to existing certificates and a benefit to GPs from fees charged for medical checks. The total benefit is estimated to be between **£0.02** to **£0.14 million (PV)**, with a central estimate of **£0.06 million (PV)** over 10 years.

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

By reducing the risk that unsuitable people gain access to firearms, the policy is expected to increase public safety. Breakeven analysis indicates that there will be an overall positive NPSV if the policy leads to a **reduction of six violence with injury offences** over the 10-year period.

BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m: (Benefits - costs)									
Cost, £m	0.01	Benefit, £m	0.00	Net, £m	-0.01				
Score for Business Impact Target (qualifying provisions only) £m:					0.0				
Is this measure likely to impact on trade and investment?					N				
Are any of these organisations in scope?		Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)				Traded:	N/A	Non-Traded:	N/A		

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 2)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	N
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Evidence Base

A. Strategic Objective and Overview

A.1 Strategic Objective

1. The strategic objective is to reduce crime and increase public safety. This can only be achieved by government intervention to amend legislation.

A.2 Background

2. Under Sections 1 and 2 of the Firearms Act 1968, (the 1968 Act) an individual would need to apply to the police for a certificate authorising them to possess a firearm to which those sections apply. (Section 1 applies to civilian firearms, such as rifles used in target shooting, whilst Section 2 applies to shotguns as defined under the 1968 Act). The police make careful checks of the suitability of applicants for and holders of firearm and shotgun certificates. In addition, applicants and holders must have “good reason” to possess firearms.
3. However, Section 11(4) of the Firearms Act 1968 specifies as follows:

“A person conducting or carrying on a miniature rifle range (whether for a rifle club or otherwise) or shooting gallery at which no firearms are used other than air weapons or miniature rifles not exceeding .23 inch calibre may, without holding a certificate, have in his possession, or purchase or acquire, such miniature rifles and ammunition suitable therefor; and any person may, without holding a certificate, use any such rifle and ammunition at such a range or gallery.”
4. Section 11(4) therefore, allows a person to run a rifle range or shooting gallery where only miniature rifles not exceeding .23-inch calibre or air weapons are used, without the need for a firearms certificate. Additionally, members of the public do not need a firearms licence to shoot at such a range or gallery.

Calls for reform

5. During the passage of the Offensive Weapons Act 2019, amendments were tabled to abolish the Section 11(4) exemption because of concerns raised by law enforcement bodies (**see Section B**). The Government undertook to review the Section 11(4) exemption.

A.3 Groups Affected

6. The National Small-Bore Rifle Association (NSRA) estimates that there are around 200 small-bore rifle clubs that use Section 11(4) in Great Britain. Many of these are also Home Office approved target shooting clubs, which possess an authorisation from the Secretary of State or, in Scotland, the Scottish Government. These clubs use the 11(4) exemption to invite non-members to experience competitive shooting. Also, the exemption is used to enable young people to experience shooting through organisations such as the Scout Association and schools.
7. Other reported types of operators who use the 11(4) exemption are set out below. It is not known precisely how many of each type of operator there are, but it is likely that the numbers are relatively small nationally. The NSRA gave approximate numbers of operators that they are aware of, as follows:
 - Sports centres running biathlon training/competitions (perhaps two).
 - Commercial ranges or activity centres offering target shooting ‘experiences’ (around 15).

- School and university shooting clubs (numbers unknown but thought to be low).
 - Temporary ranges at shows, for example, game fairs (around four).
 - Gun shops and armourers with ranges (numbers unknown but thought to be very low).
 - Shooting training organisations (numbers unknown but thought to be very low).
 - Pubs with bell target or tunnel ranges (around nine).
 - Fairground shooting galleries (nearly all now use air weapons).
8. As the NSRA provided the figure of 200 small-bore rifle clubs, the uncertainty comes with the other reported types of operators using the 11(4) exemption, with a range of 20 to 50 operators and a central estimate of 35. It is therefore estimated that there are approximately 220 to 250 operators who use the 11(4) exemption. As a result of the consultation, fairground trade representatives and those involved with bell target ranges contacted the Home Office to advise that the 11(4) exemption is still used, particularly in relation to air weapon ranges.

A.4 Consultation

Within government

9. The Government sought preliminary views from law enforcement bodies, including the National Police Chiefs Council (NPCC), the National Crime Agency (NCA) and the National Ballistics Intelligence Service (NABIS) and from leading shooting organisations that represent the sector, including the National Rifle Association (NRA) and the NSRA.

Public consultation

10. The Government consulted publicly on its proposals to amend the regulation of miniature rifle ranges as part of the wider consultation on firearms safety. This took place between 24 November 2020 and 16 February 2021 and sought views on whether anyone operating a miniature rifle range should be required to possess a firearm certificate, and on the definition of “*miniature rifle*”, and was aimed at anyone with an interest in firearms licensing and the regulation of firearms more broadly. The Government notified leading shooting organisations, including those with a particular interest in miniature rifle ranges, such as the NRA and the NSRA of the consultation and invited them to respond. The 73% of those responding agreed that the operator of a miniature rifle range should be required to hold a firearms certificate and 74% agreed that the law should be clarified so that only lower-powered, .22 rimfire guns can be used. A 71% of respondents, however, disagreed with the proposition that self-loading .22 rimfire rifles should be explicitly excluded from the definition of miniature rifle (see Annex A).

B. Rationale for intervention

11. The concerns raised by law enforcement officers are that there is a risk to public safety because the legislation allows a person to buy and possess firearms without having undergone any assessment of their suitability:
- No police checks, including criminal records checks, checks of medical suitability or assessment of ‘good reason’, are required for the operator of the miniature rifle range or members of the public shooting on the range.
 - The operator of the miniature rifle range can purchase miniature rifles and ammunition from a registered firearms dealer without being legally required to produce evidence of their authority to possess them.
 - There is no legal requirement for the operator of the range to store the guns securely or to inform police of their possession of the firearms, their number or location.

12. Additionally, there is lack of clarity about firearms that qualify as “*miniature rifles*”. The legislation refers to “*miniature rifles not exceeding .23-inch calibre*”: Although this is generally understood as applying to lower-powered, .22 rimfire guns¹, it has sometimes been interpreted as to include more powerful calibres, such as .223.
13. There is a risk that criminals or terrorists could use the exemption to acquire firearms. There is a wider risk that these individuals could acquire firearms indirectly from unsuitable and irresponsible persons holding firearms under the exemption, especially given that there are no controls on storage, ownership and location (the location of firearms may not be known to the police). Ordinarily, anyone wishing to possess Section 1 firearms would be subject to stringent suitability checks, including criminal record, counter-terrorism and medical checks. There would also need to be ‘good reason’ to hold the firearm. Firearms would be held subject to conditions. For example, firearms should be stored securely and in most cases this location should be inspected by the police.
14. Police have given examples where it is believed the exemption is being used by those who would be likely to be considered unsuitable to be granted a firearm certificate and who may in addition be allowing other unsuitable persons to use the firearms. The exemption in legislation makes it difficult for law enforcement to take action in such cases.

C. Policy objective

15. There is a risk that the exemption could enable unsuitable people to acquire firearms. The definition of a ‘miniature rifle’ needs to be clarified.
16. The policy objectives are to:
 - Require that operators using the 11(4) exemption possess a firearm certificate that specifically authorises them to do so. This will mean that the operator is subject to appropriate suitability checks, security requirements and the good reason test.
 - Re-define “*miniature rifle*”, and thereby clarify which firearms are appropriate to be used by persons who have not been subject to any suitability checks.
17. The intended effects are to increase public safety.

D. Options considered and implementation

18. **Option 1:** The ‘do-nothing’ option is to maintain the current position under which certain types of firearms can be obtained, held and used with no scrutiny or oversight. This would not mitigate the risks previously identified.
19. **Option 2:** The Government is proposing to retain the provision for miniature rifle ranges but require that operators possess a certificate. The Government is also proposing to make clear in the legislation that a “*miniature rifle*” means a .22 rimfire rifle, so that more powerful and dangerous firearms are explicitly excluded. **This is the Government’s preferred option.**
20. A different approach could be to abolish the exemption, so that all those in possession of ‘miniature rifles’ would be required to obtain a firearm certificate, in addition to the operator of the range. This could be regarded as a disproportionate response given that the exemption is extensively used, and the risks can be mitigated by other means.

¹ Rimfire refers to an ignition system where cartridges have the primer around the edge of the base and the firing pin strikes and crushes the base’s rim to ignite the primer.

E. Appraisal

General assumptions and data

21. The following assumptions and estimates have been used:
- It is estimated that there are between 220 and 250 operators (with a central estimate of 235 operators) who use the 11(4) exemption².
 - In the absence of any data, a low, central and high estimate of 25, 50 and 75 per cent of operators (55 to 188 operators, with a central estimate of 118³ operators) is used to estimate those who do not already hold a firearm certificate.
 - It is assumed that miniature rifle range operators that do not already hold firearms certificates will, on average, acquire two certificates each with a low estimate of one and high estimate of three, as many operators are likely to take the view that more than one certificate holder is needed, so that they can operate more flexibly. This is also true for those operators who only require a variation to existing certificates.
 - All operators are assumed to comply with the new regulations in year 1.
 - Many operators are likely to take the view that more than one certificate holder is needed, so that they can operate more flexibly. It is therefore assumed that on average, each operator will have two certificate holders, with a low estimate one certificate holder and a high estimate of three certificate holders.
 - As there is no evidence on how many GPs will see operators, it is assumed that one GP is required per certificate holder. This results in a range of between 220 and 750 GPs, with a central estimate of 470.
 - Costs are rounded to the nearest £100 and individuals are rounded to the nearest 100 unless otherwise stated.
 - A discount rate of 3.5 per cent has been used in this impact assessment (IA), in accordance with HM Treasury Green Book (2022) guidance⁴.
 - The number of operators and certificates are rounded to whole numbers throughout the IA. This means the high estimate of certificates required for those operators currently without certificates is 563 (187.5 x 3) not 564 (188 x 3).

COSTS

Set-up costs

Operators of miniature rifle ranges

Variations of existing certificates

22. Under the new regulations, operators of miniature rifle ranges will need a firearm certificate. In many cases, particularly for officers of Home Office Approved Clubs, the operator will already possess a firearm certificate. This means that for the low estimate, 75 per cent of operators (165) hold a firearms certificate. For the central estimate, 50 per cent of operators (118) hold a firearms certificate. Whilst for the high estimate, 25 per cent of operators (63) hold a firearms certificate.
23. In these cases, they will need a variation to the firearm certificate to add that the reason for holding the firearms is to operate a miniature rifle range, and to add firearms to their certificate with adequate security conditions. The fee for a variation of a firearm certificate is £20⁵. It is assumed that between

² Source – National Small-Bore Rifle Association, 2022.

³ Rounded to the nearest person

⁴ HM Treasury (2022) [The Green Book \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106544/green-book-2022.pdf).

⁵ [The Firearms \(Variation of Fees\) Order 2015 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444444/the-firearms-variation-of-fees-order-2015.pdf)

one and three certificate holders, with a central estimate of 2 will be needed. The cost is estimated as:

volume of operators (165, 118, 63) x volume certificate holders (1, 2, 3) x fee (£20)

24. The estimated cost for variations of existing certificates is **£3,300** for the low estimate, **£3,800** for the high estimate, and **£4,700** for the central estimate (2021/22 prices) in year 1 only.
25. The central estimate is higher than the high estimate here as it is assumed the central estimate has relatively more variation certificates than the high estimate. This means that the central estimate for the cost of variation certificates is higher than the high estimate. However the high estimate assumes relatively more new certificates than variations to existing firearms certificates than the central estimate. The cost of new certificates is higher than the cost of variation certificates so the overall cost is still higher for the high estimate when compared to the central estimate.

New certificates, including medical checks

26. In the absence of any data, a low, central and high estimate of 25, 50 and 75 per cent of operators (55 to 188 operators, with a central estimate of 118 operators) is used to estimate those who do not already hold a firearms certificate and so will need to obtain a new certificate. It is assumed that between one and three certificate holders, with a central estimate of 2 will be needed. This results in a total of 55 to 563 new certificates, and a central estimate of 235 new certificates.
27. The fee for a new firearm certificate on grant is £88⁶. New applicants for firearm certificates will in most cases be required to pay a fee by their GP surgery for the provision of medical information to the police. As set out in the IA on the guidance relating to these medical checks, data from police forces suggests that the average fee charged by GPs is £54⁷ (in 2021/22 prices). This implies an average cost to acquire a firearm certificate of £139. The cost is estimated as:

New certificates holders (55, 235, 563) x fee (£88+£54 =£142)

28. The estimated cost of new certificates lies in a range of **£7,800** to **£79,900**, with a central estimate of **£33,400** (2021/22 prices) in year 1 only.
29. Adding together the costs associated with variations, new certificates and medical checks, the total estimated set-up cost to operators of miniature rifle ranges is between **£11,100** and **£83,600**, with a central estimate of **£38,100** (2021/22 prices) in year 1 only.

Familiarisation costs

Miniature rifle range operators

30. Familiarisation costs are expected for operators of miniature rifle ranges from reading the firearms guidance. The guidance is expected to be between 13,500 and 15,500 words, with a central estimate of 14,500⁸. Reading speeds are estimated to be within 200 and 700 words per minute, with a central estimate of 400⁹. A range of reading comprehension between 50 to 80 per cent, with a central 60 per cent is also used. This results in a range of 20 minutes to 1 hour 40 minutes, with central estimate of 50 minutes¹⁰ for familiarisation reading times. As the hourly wage of certificate holders is unknown, the hourly wage for other administrative occupations¹¹ (n.e.c) from the Annual Survey of Hours and Earnings (ASHE) 2020, Table 14.5a, Standard Occupational Classification (SOC) 4159, is used

⁶ The Firearms (Variation of Fees) Order 2015 - GOV.UK (www.gov.uk)

⁷ "Firearms Act 1968: New guidance on medical checks for applicants"

⁸ GUIDANCE TO THE POLICE - FITNESS TO BE ENTRUSTED WITH A FIREARM (publishing.service.gov.uk)

⁹ Speed Reading Test Online (readingsoft.com)

¹⁰ Rounded to the nearest 5 minutes. It is assumed they do not re-read it if comprehension is between 80% to 85% as they understand it.

¹¹ Earnings and hours worked, region by occupation by four-digit SOC: ASHE Table 15 - Office for National Statistics (ons.gov.uk), 2021.

(£11.25 uprated to £11.92 in 2021/22 prices). This is uplifted by the non-wage share of 22 per cent (see Eurostat)¹² to give a wage of £14.52 per hour (see table 1).

Table 1, Familiarisation costs to certificate holders, year 1 only, £ 2021/22 prices, 2022.

Estimate	Number of officers	No. certificate holders	No. words to be read	Reading speed (wpm)	Average time familiarisation (hrs)	Hourly cost (£)	Total cost (£)
Low	220	1	13,500	700	0.37	14.52	1,200
Central	235	2	14,500	400	0.87	14.52	5,900
High	250	3	15,500	200	1.70	14.52	18,600

Source: Readingsoft.com, ASHE 2020, Table 14.5a, SOC 4159 uprated to 2021/22 prices.

31. This gives a range of **£1,200 to £18,600** for the operators familiarisation costs, with a central estimate of **£5,900**.

Administrative officers

32. Familiarisation costs are expected for administrative officers from reading the firearms guidance. It is assumed that each force has between two and eight administrative officers, with a central estimate of five¹³. As there are 43 forces, this results in a range of 86 to 344 officers, with a central estimate of 215. As the hourly wage of certificate holders is unknown, the hourly wage for government and related admin occupations¹⁴ from the Annual Survey of Hours and Earnings (ASHE) 2020, Table 14.5a, Standard Occupational Classification (SOC) 411, is used (£13.06 uprated to £13.84 in 2021/22 prices). This is uplifted by the non-wage share of 22 per cent to give a wage of £16.85 per hour.

Table 2, Familiarisation costs to administrative officers, year 1 only, £ 2021/22 prices, 2022.

Estimate	Number of officers	No. words to be read	Reading speed (wpm)	Average time familiarisation (hrs)	Hourly cost (£)	Total cost (£)
Low	86	13,500	700	0.37	16.85	500
Central	215	14,500	400	0.87	16.85	3,100
High	344	15,500	200	1.70	16.85	9,900

Source: Readingsoft.com, ASHE 2020, Table 14.5a, SOC 411 uprated to 2021/22 prices.

33. This gives a range of **£500 to £9,900** for the administrative officer familiarisation costs, with a central estimate of **£3,100**.

GPs

34. Familiarisation costs are also expected for GPs from reading the firearms guidance. As there is no evidence on how many GPs will see operators, it is assumed that one GP is required per certificate holder. As the hourly wage of certificate holders is unknown, the hourly wage for a medical practitioner¹⁵ from the Annual Survey of Hours and Earnings (ASHE) 2020, Table 14.5a, Standard Occupational Classification (SOC) 2211, is used (£32.36 uprated to £34.29 in 2021/22 prices). This is uplifted by the non-wage share of 22 per cent to give a wage of £41.76 per hour.

¹² See Eurostat (2019) Non-wage share of labour cost for the UK. Calculation is $0.179/0.821 = 21.8\%$ which is rounded up to 22%. See: https://ec.europa.eu/eurostat/databrowser/view/lc_lci_lev/default/table?lang=en

¹³ Estimates provided by the police to the Home Office.

¹⁴ Earnings and hours worked, region by occupation by four-digit SOC: ASHE Table 15 - Office for National Statistics (ons.gov.uk), 2021.

¹⁵ Earnings and hours worked, region by occupation by four-digit SOC: ASHE Table 15 - Office for National Statistics (ons.gov.uk), 2021.

Table 3, Familiarisation costs to GPs, year 1 only, £ 2021/22 prices, 2022.

Estimate	Number of GPs	No. words to be read	Reading speed (wpm)	Average time familiarisation (hrs)	Hourly cost (£)	Total cost (£)
Low	220	13,500	700	0.37	41.76	3,400
Central	470	14,500	400	0.87	41.76	17,000
High	750	15,500	200	1.70	41.76	53,400

Source: Readingsoft.com, ASHE 2020, Table 14.5a, SOC 2211 uprated to 2021/22 prices.

35. This gives a range of **£3,400** to **£53,400** for the GP familiarisation costs, with a central estimate of **£17,000**.

Ongoing costs

Operators of miniature rifle ranges

Renewal of firearm certificates

36. A firearm certificate typically lasts for five years from the date it was issued, so operators of miniature rifle ranges will be required to renew their certificate every five years (in year 6), so a new certificate is required twice in a 10-year period.
37. In year 6, renewal of a firearm certificate costs £62¹⁶, and new medical information will also need to be provided at a cost of £54 (in 2021/22 prices). A low, central and high estimate of 25, 50 and 75 per cent of operators (55 to 188 operators, with a central estimate of 118 operators) is used to estimate those who do not already hold a firearms certificate and will need to obtain a new certificate. Miniature rifle range operators will hold two firearm certificates on average with a low estimate of one certificate holder and high estimate of three certificate holders. This results in a cost of between £116 and £348 per miniature rifle range operator, with a central cost of £232. The estimated total cost across all operators is between £6,400 and £65,300, with a central estimate of £27,300 (all 2021/22 prices), which occurs in the sixth year only.
38. The estimated cost lies in a range of **£5,400 to £55,000 (PV)**, with a central estimate of **£23,000 (PV)** in year 6 only.

Definition of “miniature rifle”

39. The NSRA and the NRA have stated that legitimate operators all take the term “miniature rifle” to mean .22 rimfire, as suggested by the Home Office Guide on Firearms Licensing Law¹⁷. Clarifying that this is the definition will not affect compliant operators but will affect only a small number who are seeking to use the exemption as a loophole. It is therefore expected that clarifying the definition of a miniature rifle will have a negligible cost to operators.

The police

40. It is expected that there will be a processing cost of issuing firearms certificates. In the absence of robust data, the processing cost is expected to take between 60 minutes to 240 minutes (1 to 4 hours), with a central estimate of 150 minutes (2.5 hours). An Administrative Officer will process these certificates. The ASHE 2020, Table 14.5a give the hourly wage for this occupation (SOC 411) as (£13.06 uprated to £13.84 in 2021/22 prices). This is uplifted by the non-wage share of 22 per cent to give a wage of £16.85 per hour.

¹⁶ The Firearms (Variation of Fees) Order 2015 - GOV.UK (www.gov.uk)

¹⁷ Home Office Guide on Firearms Licensing Law 2021, available at Firearms licensing law - GOV.UK (www.gov.uk)

41. Volumes of new certificates and volumes of variation of certificates are estimated for the L, C and H scenarios and the calculation is given below.
- In the low scenario 110 new certificates are required (55 in year 1 and 55 in year 6). Variations to existing certificates (165) are required in year 1.
 - The central estimate of new certificates required is 470, (235 in year 1 and 235 in year 6). Variations to existing certificate (235) are required in year 1
 - For the high estimate of new certificates required, is 1,125 (563 in year 1 and 563 in year 6). Variations to existing certificate (188) are required in year 1.
- (volume of new certificates (110, 470, 1125) x £16.85 x time (1, 2.5, 4 hrs)) + (volume of renewal certificates (165, 235, 188) x £16.85 x time (1, 2.5, 4 hrs))*
42. The cost of issuing new certificates and variations to certificates is estimated in a range of **£4,500 to £82,500 (PV)**, with a central estimate of **£28,100 (PV)** over 10 years.

GPs

43. It is expected that there will be a processing cost for the medical checks. In the absence of robust data, the processing cost is expected to take between 15 minutes to 125 minutes (0.25 to 2.08 hours), with a central estimate of 70 minutes (1.17 hours). An Administrative Officer will process these certificates. The ASHE 2020, Table 14.5a give the hourly wage for this occupation (SOC 2211) as (£32.36 uprated to £34.29 in 2021/22 prices). This is uplifted by the non-wage share of 22 per cent to give a wage of £41.76 per hour.
44. Volumes of medical checks are estimated for the L, C and H scenarios and the calculation is given below.
- In the low scenario 110 new certificates are required (55 in year 1 and 55 in year 6). Variations to existing certificates (165) are required in year 1.
 - The central estimate of new certificates required is 470, (235 in year 1 and 235 in year 6). Variations to existing certificate (235) are required in year 1
 - The high estimate of new certificates required is 1,125 (563 in year 1 and 563 in year 6). Variations to existing certificate (188) are required in year 1.
- (volume of new certificates (110, 470, 1125) x £41.76 x time (0.25, 1.17, 2.08 hrs)) + (volume of renewal certificates (165, 235, 188) x £41.76 x time (0.25, 1.17, 2.08 hrs))*
45. The cost of medical checks is estimated in a range of **£2,800 to £106,500 (PV)**, with a central estimate of **£32,500 (PV)** over 10 years.

Total costs

46. Total costs are estimated to be between **£0.03 (PV)** and **£0.41 million (PV)**, with a central estimate of **£0.15 million (PV)** over 10 years.

BENEFITS

Ongoing and total benefits

Ongoing benefits

Society

47. This policy is expected to increase public safety, by reducing the risk that unsuitable people gain access to firearms. This benefit cannot be robustly estimated due to a lack of evidence on how many firearms-related injuries or fatalities are likely to be avoided following these changes. However, a

breakeven analysis has been undertaken to illustrate the magnitude of benefits required for this policy to have a positive NPSV.

48. The cost to society of a 'violence with injury' offence is estimated at £16,200, after uprating to 2021/22 prices¹⁸. The total NPSV of this policy is estimated to be between **-£12,400 and -£270,800**, with a central estimate of **-£86,700**, so there will be an overall positive NPSV if the policy leads to a reduction of between 1 and 17 violence with injury offences, with a central estimate of 6 over the 10-year appraisal period.

The police

49. There is a benefit to the police from the fee income generated by firearm certificates. The fee for a variation of a firearm certificate is £20¹⁹. Many operators are likely to take the view that more than one variation to a certificate holder is needed, so that they can operate more flexibly. It is assumed that on average, each operator will have two certificate holders, with a low estimate of one certificate holder and a high estimate of 3 certificate holders.
50. The benefit from variations of existing certificates to the police is estimated to be **£3,300** for the low estimate, **£3,800** for the high estimate, and **£4,700** for the central estimate (2021/22 prices) in year 1 only. The central estimate is higher than the high estimate as variations of firearms certificates are cheaper than new firearms certificates. This is because the high estimate assumes relatively more new certificates than variations to existing firearms certificates than the central estimate.
51. The fee for a new firearm certificate on grant is £88. Multiplying this by the number of new firearms certificates required (55 to 563 with a central estimate of 235) gives a range of **£4,800 to £49,500**, with a central estimate of **£20,700**. The fee to renew a firearms certificate is £62. Multiplying this by the number of new firearms certificates required (55 to 563, with a central estimate of 235) gives a range of **£3,400 to £34,900**, with a central estimate of **£14,600**. The total benefit to the police from these fees is a range of **£11,000 (PV) to £82,600 (PV)**, with a central estimate of **£37,600 (PV)** over 10 years.

GPs

52. There is a benefit to GPs from the fee income generated by the medical checks. The fee for medical checks is £54. Many operators are likely to take the view that more than one variation to a certificate holder is needed, so that they can operate more flexibly. It is assumed that on average, each operator will have two medical checks (one per certificate holder) with a low estimate of one medical check and a high estimate of 3 medical checks. The benefit from fee income for medical checks to GPs is estimated in a range of **£5,500 to £56,000 (PV)**, with a central estimate of **£23,400 (PV)** over 10 years.

Total benefit

53. The total benefit to the police and GPs from these fees is estimated in a range of **£16,500 to £138,600 (PV)**, with a central estimate of **£61,000 (PV)** over 10 years.

NPSV, BNPV, EANDCB

54. The concept of present value (PV) considers that a set sum of money is not as valuable to people at some point in the future as it would be today, reflecting both time preference and an assumption that the economy is expected to grow over time. The marginal utility of each additional pound diminishes

¹⁸ The cost was taken from The Economic and Social Costs of Crime publication and uprated to 2021/22 prices using the GDP deflator. Source: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732110/the-economic-and-social-costs-of-crime-horr99.pdf

¹⁹ The Firearms (Variation of Fees) Order 2015 - GOV.UK (www.gov.uk)

in the future. Future costs and benefits therefore must be discounted in order to be comparable to today's costs and benefits. The NPSV of a policy is the present value of the economic benefits minus the present value of the economic costs. This is widely used to give a welfare measure of a policy in comparable terms, that is in monetary units (See table 4 for a Summary of costs, benefits, NPSV, BNPV, and EANDCB).

55. The NPSV of the policy lies in a range between **-£0.01 million** and **-£0.27 million**, with a central estimate of **-£0.09 million**.
56. There are costs to businesses through the familiarisation costs faced by air weapon dealers. This results in an estimated Business Net Present Value (BNPV) between **-£17,700** and **-£157,200**, with a central estimate of **-£67,000** over 10 years.
57. The equivalent annual net direct cost to business (EANDCB) is estimated to be between **£2,100** and **£18,300**, with a central estimate of **£7,800**.

Table 4, Summary of costs, benefits, NPSV, BNPV, EANDCB, 10 years (£) 2022).

Costs	Low	Central	High
Set-up costs	13,200	51,400	135,100
Ongoing costs (PV)	16,900	104,000	298,300
Total costs (PV)	28,900	147,800	409,400
Total benefits (PV)	16,500	61,000	138,600
NPSV	-12,400	-86,700	-270,800
BNPV	-17,700	-67,000	-157,200
EANDCB	2,100	7,800	18,300

Note: Home Office analysis, 2021/22.

Value for money (VfM)

58. The measures in **Option 2** require operators of miniature rifle ranges to possess a firearms certificate. This will mean that the operator is subject to appropriate suitability checks, security requirements and the good reason test. These suitability checks should ensure that only suitable individuals are operating miniature rifle ranges. This should result in a decrease in the incidences of violent crime involving firearms. This also means that **Option 2** is likely to meet the strategic objectives of reducing crime and increasing public safety. If these objectives are achieved then this would mean value for money for the taxpayer.

Impact on small and micro-businesses

59. A small and micro-business assessment has been conducted. All operators of miniature rifle ranges are likely to be small or micro-businesses, however there is no published data at this disaggregated level in the Business Population Estimates (2019)²⁰ that specifically identifies these businesses. It is not feasible to exclude them from this policy as this would negate all of the public safety benefits of the policy. Both of these facts make it very challenging to conduct an in-depth SaMBA in the timeframe given. It would also be disproportionate to develop and conduct a survey for the very small

²⁰ See BEIS (2019) Business Population Estimates 2019, <https://www.gov.uk/government/statistics/business-population-estimates-2019>, Tables 4-7 and 1-3.

numbers involved (who already operate in a regulated environment) for the small costs that have been estimated.

F. Proportionality

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

G. Risks

63. There is a risk that more than half of miniature rifle range operators would need to apply for a new firearm certificate rather than just a variation, which would increase the total costs to operators. This is why a low, central and high estimate of 25, 50, and 75 per cent has applied. There is a risk that a non-compliant operator of a miniature rifle range could sell their firearms on the black market, following the legislative change. However, this would be non-compliant behaviour and any figures would not be included in the NPSV.

H. Summary table, direct costs and benefits to business

64. This policy is exempt from the Business Impact Target, as the costs to business are below the threshold. The costs and benefits to business and other groups are presented in the Table 2. Businesses will experience costs as operators of miniature rifle ranges will need to pay for new firearm certificates or variations to existing firearm certificates as a result of this policy.

Central estimate

Table 5, Summary of monetised costs and benefits, £ million (PV) over 10 years.

Costs	£m (PV)	Benefits	£m (PV)
Businesses	0.07		
Individuals	0.00	Home Office and the police	0.04
GPs	0.05	GPs	0.02
Home Office and the police	0.03		
Total cost	0.15	Total benefit	0.06
Net Present Social Value (NPSV)	-0.09		
Business NPV	-0.07		
EANDCB	0.01		

Note: Home Office analysis, 2021/22.

Low estimate

Table 6, Summary of monetised costs and benefits, £ million (PV) over 10 years.

Costs	£m (PV)	Benefits	£m (PV)
Businesses	0.02		
Individuals	0.00	Home Office and the police	0.01
GPs	0.01	GPs	0.01
Home Office and the police	0.01		
Total cost	0.03	Total benefit	0.02
Net Present Social Value (NPSV)	-0.01		
Business NPV	-0.02		
EANDCB	0.00		

Note: Home Office analysis, 2021/22.

High Estimate

Table 7, Summary of monetised costs and benefits, £ million (PV) over 10 years.

Costs	£m (PV)	Benefits	£m (PV)
Businesses	0.16		
Individuals	0.00	Home Office and the police	0.08
GPs	0.16	GPs	0.06
Home Office and the police	0.09		
Total cost	0.41	Total benefit	0.14
Net Present Social Value (NPSV)	-0.27		
Business NPV	-0.16		
EANDCB	0.02		

Note: Home Office analysis, 2021/22.

I. Wider impacts

65. There are no significant wider impacts arising from this policy to be considered.

J. Trade Impact

66. This measure is unlikely to have any significant impacts on trade or investment.

K. Monitoring and evaluation (PIR if necessary)

67. Implementation would require primary legislation. Therefore, there is no implementation date at present. If introduced, these proposals would be enforced by the police.

L. Annexes.

Impact Assessment Checklist

Mandatory specific impact test - Statutory Equalities Duties	Complete
<p>Statutory Equalities Duties</p> <p>The public sector equality duty requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations in the course of developing policies and delivering services. [Equality Duty Toolkit]</p> <p>In evaluating the impact of the introduction of the new policies set out in this IA, due consideration has been undertaken to assess any discriminatory impacts on groups with protected characteristics including age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation.</p> <p>After careful assessment of the discriminatory impact, this policy is likely to indirectly discriminate against men as firearms are disproportionately held by men. However, it is also likely that the benefits will accrue disproportionately to this group.</p> <p>The public sector equality duty has been considered and the Equality Impact Assessment will be published.</p> <p>The SRO has agreed these summary findings from the Equality Impact Assessment.</p>	Yes

Any test not applied can be deleted except the **Equality Statement**, where the policy lead must provide a paragraph of summary information on this.

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

Economic Impact Tests

Does your policy option/proposal consider...?	Yes/No (page)
<p>Business Impact Target</p> <p>The Small Business, Enterprise and Employment Act 2015 (s. 21-23) creates a requirement to assess the economic impacts of qualifying regulatory provisions on the activities of business and civil society organisations. [Better Regulation Framework Manual] or</p> <p>This policy is exempt from the Business Impact Target, as the costs to business are below the threshold. A small cost to business from this policy has been estimated, with a net cost to business per year (EANDCB) of £0.01 million and a Business Net Present Value of -£0.07 million.</p>	Yes

<p>Small and Micro-business Assessment (SaMBA)</p> <p>The SaMBA is a Better Regulation requirement intended to ensure that all new regulatory proposals are designed and implemented so as to mitigate disproportionate burdens. The SaMBA must be applied to all domestic measures that regulate business and civil society organisations, unless they qualify for the fast track. [Better Regulation Framework Manual] or [Check with the Home Office Better Regulation Unit]</p> <p>Rifle ranges are likely to be small or micro-businesses, however there is no published data at this disaggregated level in the Business Population Estimates (2019)²¹ that specifically identifies these businesses. It is not feasible to exclude them from this policy as this would negate all of the public safety benefits of the policy. Both of these facts make it very challenging to conduct an in-depth SaMBA in the timeframe given. It would also be disproportionate to develop and conduct a survey for the very small numbers involved (who already operate in a regulated environment) for the small costs that have been estimated.</p>	Yes
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²¹ See BEIS (2019) Business Population Estimates 2019, <https://www.gov.uk/government/statistics/business-population-estimates-2019>, Tables 4-7 and 1-3.

ANNEX A: Firearms safety consultation: findings

List of organisations that responded to the Consultation

- British Association for Shooting and Conservation
- BIAZA (British and Irish Association of Zoos and Aquariums)
- British Shooting Sports Council
- Cats Protection
- Deactivated Weapons Association
- Department for Environment, Food and Rural Affairs
- Essex Police
- Family members of the victims of air weapons shootings and their MPs
- Fifty Calibre Shooters Association
- Gun Control Network
- Gun Trade Association
- Historical Breechloading Smallarms Association
- Metropolitan Police, Wildlife Crime Unit
- NABIS (National Ballistics Intelligence Service)
- National Farmers' Union
- National Rifle Association
- National Small-bore Rifle Association
- Northamptonshire Police
- NPCC lead on the Criminal Use of Firearms
- NPCC lead on Firearms Licensing
- RSPCA
- Scottish Association for Country Sports
- Showmen's Guild of Great Britain
- Society of Independent Roundabout Proprietors
- Vintage Arms, Scotland

The remaining responses were from individuals or from respondents who provided no identifying information.

Miniature rifle ranges: consultation summary.

To what extent do you agree that a person should be required to obtain a firearm certificate in order to operate a miniature rifle range?

	Responses	Percentage (%)
Strongly agree	3,083	25
Agree	6,037	48
Neither agree nor disagree	896	7
Disagree	900	7
Strongly disagree	1,627	13
Total	12,543	100

Almost three quarters (73%) of respondents who answered this question agreed or strongly agreed that a person operating a miniature rifle range should obtain a firearm certificate. Over three quarters (78%) of respondents categorised as Shooting Organisations agreed or strongly agreed with this measure.

20% of respondents who answered this question disagreed or strongly disagreed with this measure.

To what extent do you agree that only rifles not exceeding .22 rimfire should be considered as miniature rifles for the purposes of the provision?

	Responses	Percentage (%)
Strongly agree	2,422	19
Agree	6,823	55
Neither agree nor disagree	1,299	10
Disagree	754	6
Strongly disagree	1,213	10
Total	12,511	100

Almost three quarters (74%) of respondents who answered this question agreed or strongly agreed that only rifles not exceeding .22 rimfire should be considered as miniature rifles for the purpose outlined.

16% of respondents who answered this question disagreed or strongly disagreed with this approach. Almost one third (30%) of respondents categorised as Law Enforcement disagreed or strongly disagreed with this measure.

To what extent do you agree that self-loading .22 rimfire rifles should not be considered miniature rifles for the purposes of the provision?

	Responses	Percentage (%)
Strongly agree	1,174	9
Agree	1,160	9
Neither agree nor disagree	1,327	11
Disagree	2,031	16
Strongly disagree	6,827	55
Total	12,519	100

Almost three quarters (71%) of respondents who answered this question disagreed or strongly disagreed that self-loading .22 rimfire rifles should not be considered miniature rifles.

18% of respondents who answered this question agreed or strongly agreed that self-loading .22 rimfires should not be considered miniature rifles. This percentage was higher amongst respondents categorised as Shooting Organisations (21%) and Shooting Community (22%).