Impact Assessment

Title:	Provision to remove sound moderators from firearms licensing controls
Type of measure:	Primary Legislation
Department or agency:	Home Office
IA number:	HO IA 1031
Type of Impact Assessment:	Enactment
RPC reference number:	N/A
Contact for enquiries:	CrimeandPolicingBillTeam@homeoffice.gov.uk
Date:	20/04/2026

1. Summary of proposal

1. The proposal is to legislate to deregulate devices known as sound moderators and flash suppressors. Under section 57 of the Firearms Act 1968[1], sound moderators are defined as firearms and are subject to licensing controls.

2. At present, a sound moderator can only be held lawfully if included on a firearms certificate issued by the police. However, as they are not of themselves dangerous, the government is seeking to change this.

2. Strategic case for proposed regulation

3. Sound moderators are entirely inert objects containing no moving parts, and do not of themselves create a risk to public safety. There is no evidence to show that sound moderators have ever featured in any significant way in crimes involving firearms.

[1] Firearms Act 1968, Section 57 - https://www.legislation.gov.uk/ukpga/1968/27/section/57

4. The most recent firearms licensing statistics[2] show that of the 626,276 firearms certificates on issue, 33 per cent are sound moderators. Removing them from the legal definition of a firearm will alleviate the significant administrative burden on police firearms licencing departments who are required to process applications to include sound moderators on firearms licensing certificates and it will also benefit firearm certificate holders who will no longer be required to apply for, and pay for, a variation of their licence each time they acquire or dispose of a sound moderator.

5. 94 per cent of the 19,277 people who responded to the government consultation[3] on sound moderators either agreed or strongly agreed that the requirement to obtain a certificate from the police to acquire and possess a sound moderator should be removed. 98 per cent of those who responded to the consultation also either agreed or strongly agreed that there is no risk to public safety in removing sound moderators from licensing controls. Many of those who responded to the consultation also noted that those who use sound moderators lawfully would already have been subject to police suitability checks before obtaining their firearms certificate which strengthens the case for de-regulating the controls on sound moderators.

3. SMART objectives for intervention

6. The policy objective is to remove unnecessary administrative burdens and costs shouldered by firearms licence holders and the police by amending the Firearms Act 1968[4], to remove the reference to sound moderators so that they are no longer classified as firearms in law. This will remove sound moderators from the Firearms Act 1968, thereby removing them from firearms licensing controls so that, in future, they are regarded in the same way as any other non-licensed firearm accessory.

7. The objectives include;

    a. **Objective 1**- Reduce police administrative burden: Remove the requirement for police forces to process certificate variations and maintain records for sound moderators.

    b. **Objective 2** - Reduce administrative burden on Registered Firearms Dealers: Remove the requirement for Registered Firearms Dealers to check firearms certificates and record transactions for sound moderators.

    c. **Objective 3** - Reduce unnecessary costs for firearms certificate holders: Remove the requirement for firearms certificate holders to apply and pay for certificate variations when acquiring or disposing of sound moderators.

8. These objectives apply to sound moderators currently recorded on certificates, accounting for around a third of all recorded items as sound moderators represent 33 percent of 626,276 firearms held on a certificate. Removing licensing controls will

---

2 Firearm and shotgun certificates, April 2024 to March 2025 - GOV.UK: https://www.gov.uk/government/statistics/firearm-and-shotgun-certificates-april-2024-to-march-2025/firearm-and-shotgun-certificates-april-2024-to-march-2025#firearm-and-shotgun-certificates-on-issue

3 Firearms licensing: sound moderators - https://www.gov.uk/government/consultations/firearms-licensing-sound-moderators

4 Firearms Act 1968 - https://www.legislation.gov.uk/ukpga/1968/27/contents

eliminate variation applications and associated costs. The change will apply from commencement of the Crime and Policing Act 2026.

9. As noted above, the intended effects include;

    a. The change will remove the need for firearm certificate holders to apply to the police for a variation to their certificates in future, and to pay for that variation, to acquire or change possession of a sound moderator.

    b. The change will also remove the administrative burden on the police that currently arises from the need for them to vary certificates and to record acquisition or changes to sound moderators held by certificate holders and to enter details on to the National Firearms Licensing Management System. This would lead to savings in police time and resource. Policing would lose the income from the fees but given fees were set at full cost recovery in 2025, it is expected that this would have a neutral net impact on policing.

    c. The change will generate savings in time and money for firearms certificate holders who acquire the accessory. Making this change would save certificate holders the time required to apply to the police for a variation of their firearms certificate each time they acquired a sound moderator and the cost of paying the fee for a variation of certificate, which is currently £47[5] each time a certificate is varied.

    d. The removal of sound moderators from firearms licensing controls would also generate savings for Registered Firearms Dealers, who will no longer be required to keep a record of the transaction.

10. This represents a relatively small change in regulation to a small part of the firearms accessories market. This is not expected to have a substantial impact on growth overall. The removal of administrative burdens will likely support businesses operating in the sector.

4. Description of proposed intervention options and explanation of the logical change process whereby this achieves SMART objectives

Options considered:

11. **Option 0 - 'Do-nothing'** - This option would not reduce or simplify regulation, reduce administrative burdens or remove unnecessary costs.

12. **Option 1 - to remove sound moderators from the definition of 'firearm' under section 57 of the Firearms Act 1968**. This removes the legal requirement for licensing, certificate variations, and transaction recording, directly eliminating unnecessary administrative processes and costs for police forces, Registered Firearms Dealers, and firearms certificate holders.

[5] Circular 001/2025: Firearms (Variation of Fees) Order 2025 - https://www.gov.uk/government/publications/circular-0012025-firearms-variation-of-fees-order-2025/circular-0012025-firearms-variation-of-fees-order-2025

Logical change process:

13. **Inputs**: Legislating to remove sound moderators from the scope of the Firearms Act 1968 removes the legal requirement for them to be licensed, which in turn eliminates the need for certificate variations, licence checks, and transaction recording.

14. **Activities**: Following the legislative change, firearms certificate holders no longer need to apply for or pay for variations when acquiring a sound moderator, police forces no longer need to process applications or maintain records on the National Firearms Licensing Management System, and Registered Firearms Dealers no longer need to record sales.

15. **Outputs**: The volume of licence variation applications, transaction records, and associated administrative processing related to sound moderators is reduced across police forces, firearms certificate holders, and Registered Firearms Dealers.

16. **Outcomes**: This reduces administrative activity and associated costs across all affected parties, particularly police firearms licensing units and firearms purchasers, while core firearms licensing processes continue to apply to controlled weapons.

17. **Impact**: Over the longer term, the policy delivers the objective of reducing unnecessary regulatory and administrative burdens in firearms licensing, supporting the objective of an effective and efficient firearms licensing service while at the same time having no negative impact on the government's overarching priority to ensure that firearms licensing controls ensure the safety of firearms licence holders, their families and the wider public.

5. Summary of long-list and alternatives

18. There is no long list of policy options because there are limited feasible ways to achieve the policy objectives. The administrative burdens and costs identified arise directly from the classification of sound moderators as firearms in legislation.

19. As a result, the only realistic options are to retain the current regulatory framework (Do nothing) or to amend primary legislation to remove sound moderators from firearms licensing controls. These options are both carried forward to the shortlist.

6. Description of shortlisted policy options carried forward

20. The long list of options has been assessed against the following critical success factors, in line with Green Book guidance:

- **Strategic fit**: how well the option provides holistic fit and synergy with other strategies, programmes and projects.
- **Potential value for money**: how well the option optimises social value in terms of potential costs, benefits and risks.
- **Potential affordability**: how well the option can be financed from available funds.

- **Potential achievability**: how well the option is likely to be delivered given an organisation's ability to respond to the changes required.

Rating against Critical Success Factors

	Option 0 (Do nothing)	Option 1 (preferred)
Strategic fit	Red	Green
Potential value for money	Red	Green
Potential affordability	Green	Green
Potential achievability	Green	Green

RAG key: Green = fit for purpose (meets the critical success factor). **Red** = not fit for purpose (does not meet the critical success factor).

How the shortlisted options perform against the critical success factors

Option 0 (Do nothing)

- **Strategic fit (Red):** Does not support the policy objective to reduce unnecessary regulatory and administrative burdens, because it keeps sound moderators within firearms licensing controls (and therefore keeps the existing processes for certificate variations and record-keeping).
- **Potential value for money (Red):** Delivers no additional benefits, while the burdens and costs to certificate holders, the police and Registered Firearms Dealers continue.
- **Potential affordability (Green):** No additional funding is required to maintain the current arrangements (beyond business-as-usual activity already funded within existing budgets and fee income).
- **Potential achievability (Green):** Achievable in delivery terms because it requires no changes to legislation, systems or operational practice (it is simply continuation of current arrangements).

Option 1 (Preferred): Remove sound moderators from the definition of 'firearm' under section 57 of the Firearms Act 1968

- **Strategic fit (Green):** Directly supports the strategic objective of reducing unnecessary regulatory and administrative burdens while maintaining the overall effectiveness of firearms controls for genuinely controlled weapons.
- **Potential value for money (Green):** Generates net benefits by removing unnecessary processes (time savings to police and Registered Firearms Dealers, and avoided variation fees for certificate holders).
- **Potential affordability (Green):** No additional programme funding is required to implement the change; there are no material set-up costs identified, and the net impact on policing is expected to be broadly neutral given full cost recovery of fees.
- **Potential achievability (Green):** Achievable because delivery is primarily through commencement of the relevant legislative provision, with limited operational change (updates to guidance and communication to affected parties).

21. Option 0 doesn't achieve the strategic aims of reducing unnecessary regulatory and administrative burdens in firearms licensing.

22. The following options were shortlisted:

a. **Option 0 - 'Do-nothing'** - This would mean that sound moderators would still be defined as firearms in law by virtue of section 57(1)(d) of the Firearms Act 1968. The consequence of this is that firearms certificate holders would continue to be required by law to apply to the police for a variation to their certificate, and to pay for that variation, to acquire or change possession of a sound moderator.

b. **Option 1 - to remove sound moderators from the definition of 'firearm' under section 57 of the Firearms Act 1968.** The Crime and Policing Act 2026 includes a provision which will, when commenced, amend the definition of 'firearm' in section 57(1)(d) of the Firearms Act 1968[6] to remove sound moderators from that definition. **Option 1 is the government's preferred option.**

Non-regulatory options

23. There are no non-regulatory options for this policy. Sound moderators are subject to control because they are specifically included in the definition of 'firearm' in the Firearms Act 1968. The only way to achieve the policy objective is to amend the definition in the 1968 Act. This can only be done by the government amending legislation.

Small and Micro Business Assessment

24. Registered Firearms Dealers (RFDs), many of whom are small or micro businesses, are in scope of this measure. The proposal removes existing regulatory requirements by taking sound moderators out of firearms licensing controls, thereby reducing administrative and record-keeping activity for firearms dealers.

25. A small and micro business exemption has been considered but is not required, as the measure is deregulatory and does not introduce new obligations or costs for businesses. Exempting small and micro businesses would not deliver additional benefits beyond those achieved by the preferred option. The impacts are not considered disproportionate for small and micro businesses; rather, they are expected to benefit proportionately from reduced processing time and administrative effort when supplying sound moderators. As the measure removes burdens and generates savings, no specific mitigation for small and micro businesses is necessary.

26. The specific saving to small businesses could not be estimated as no data is held on the number of RFDs that are small businesses.

[6] Section 57(1)(d) of the Firearms Act 1968 - https://www.legislation.gov.uk/ukpga/1968/27/section/57B

7. Regulatory scorecard for preferred option

Please provide quantitative estimates and qualitative descriptions of impacts under each heading in the following sections. The right-hand column for directional ratings should be based on the description of impact and the sign of the suggested indicator (NPV, NPSV, all impacts): **Green** – positive impact, **red** – negative impact, **amber** – neutral or negligible impact, **blue** – uncertain impact. Please use the colours in the examples shown below, as these are suitable accessible colours. Please see BRF guidance technical annex for definitions.

Part A: Overall and stakeholder impacts

(1) Overall impacts on total welfare		**Directional rating** **Note: Below are examples only**
Description of overall expected impact	There are monetised impacts of a net benefit to Registered Firearms Dealers and firearms certificate holders. The net impact on policing is expected to be neutral.	**Positive** **Based on all impacts (incl. non-monetised)**
Monetised impacts	Monetised benefits include time savings to police and Registered Firearms Dealers, and financial savings to firearms certificate holders. Monetised costs primarily reflect lost fee income to policing, which represents a transfer and is offset by reduced processing activity. The Net Present Social Value is positive, with a central estimate of approximately £4.5 million.	**Positive** **Based on likely £NPSV**
Non-monetised impacts	No non-monetised impacts identified.	**Neutral**
Any significant or adverse distributional impacts?	No significant adverse distributional impacts are expected.	**Neutral**

(2) Expected impacts on businesses		
Description of overall business impact	The overall impact on businesses is **positive**. Registered Firearms Dealers benefit from reduced administrative and record-keeping requirements.	**Positive**
Monetised impacts	The Business Net Present Value is positive, with estimated savings of around £0.7 million (PV).	**Positive** **Based on likely business £NPV**
Non-monetised impacts	No significant non-monetised adverse impacts are expected.	**Neutral**
Any significant or adverse distributional impacts?	No disproportionate regional or sectoral impacts have been identified.	**Neutral**
(3) Expected impacts on households		
Description of overall household impact	The overall impact on households is **positive**. Firearms certificate holders benefit from avoided variation fees and reduced administrative effort.	**Positive**
Monetised impacts	Household NPV is positive, with a central estimate of approximately £3.8 million (PV).	**Positive** **Based on likely household £NPV**
Non-monetised impacts	No non-monetised impacts have been identified.	**Neutral**
Any significant or adverse distributional impacts?	No adverse distributional impacts have been identified.	**Neutral**

Part B: Impacts on wider government priorities

Category	Description of impact	Directional rating
Business environment: **Does the measure impact on the ease of doing business in the UK?**	The measure improves the ease of doing business by removing unnecessary regulatory barriers.	**Supports**
International Considerations: **Does the measure support international trade and investment?**	No significant impacts on trade or investment have been identified.	**Neutral**
Natural capital and Decarbonisation: **Does the measure support commitments to improve the environment and decarbonise?**	No material environmental or climate impacts are expected.	**Neutral**

8. Monitoring and evaluation of preferred option

27. There will be no formal monitoring or evaluation of the measure. It is de-regulatory. There will be no requirements for sound moderators to be recorded on firearms licences and there will therefore be no means, or need, to monitor how many are bought, sold or transferred. The government keeps the effectiveness of firearms licensing controls and police performance under regular review. As part of the process, liaison groups have been set up involving various stakeholders including representatives of the police, gun trade and shooting organisations and will be used to surface any unintended consequences.

9. Minimising administrative and compliance costs for preferred option

28. There are no administrative of compliance costs for any of the options considered, including the preferred option. Removing sound moderators from Firearms Act 1968 controls removes administrative and compliance costs because dealers no longer need to do licence checks and record-keeping for moderator sales.

10. Main assumptions / sensitivities and economic / analytical risks

29. There is some uncertainty around the estimates of volumes and savings to businesses. Scenario analysis is used throughout to account for this but given the overall value is low and NPSV is positive no further sensitivity has been undertaken.

30. As specific data on Registered Firearms Dealers was not available, the analysis relies on assumptions provided by the Gun Trade Association. This introduces some uncertainty around the scale of business savings. However, the associated impact of this is low. The change results in a small time saving per sound moderator for dealers, and there are no additional costs to businesses. Therefore, if there is variation from the estimate it would only be in scale of savings, the overall impact to businesses would still be positive.

Declaration

Department:

…

Contact details for enquiries:

…

Minister responsible:

Sarah Jones, Minister for Policing and Crime

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: 

Date: 21/09/26

Summary: Analysis and evidence

For Final / Enactment Stage Impact Assessment, please finalise these sections including the full evidence base. For a Consultation Stage Impact Assessment, these sections can be in less detail with evidence gaps highlighted.

Price base year: 2025/26

PV base year: 2026/27

This table may be reformatted provided the side-by-side comparison of options is retained		**0. 'Do nothing' (baseline)**	**1. Remove sound moderators from the definition of 'firearm' under section 57 of the Firearms Act 1968**
Costs (£m)	Low	0	3.0
	High	0	4.6
	Best	**0**	**3.8**
(Distinguish between setup and ongoing costs, as well as private/public costs)			The only cost is the lost income from fees to policing.
Benefits (£m)	Low	0	6.5
	High	0	10.4
	Best	**0**	**8.4**
(Distinguish between setup and ongoing benefits, as well as private/public benefits			Benefits include; • Saving from no longer paying fee to purchasers of sound moderators would between £3.0 and £4.6 million **with a central estimate of £3.8 million.** • Time saving to policing would be between £3.0 and £4.6 million **with a central estimate of £3.8 million (PV).** • Time saving to saving to Registered Firearms Dealers would be between £0.4 and £1.2 million with **a central estimate of £0.7 million (PV).**

Net present social value (£m)	Low	0	3.4
	High	0	5.8
	Best	0	4.5
Public sector financial costs (with brief description, including ranges)		0	Lost fee income is the only cost to the public sector and represents a financial cost. It should be noted that in 2025, firearms licensing fees were set at cost recovery, the cost of lost fee income to policing is expected to be offset by the resource saving of the police no longer having to process these licenses. This means the estimated overall impact on the public sector is neutral. It is up to individual forces to determine how they utilise the savings.
Significant un-quantified benefits and costs (description, with scale where possible)		None	None
Key risks (and risk costs, and optimism bias, where relevant)		There are no risks associated with this option.	There is some uncertainty around the estimates of volumes and savings to businesses. As specific data on Registered Firearms Dealers was not available, the analysis relies on assumptions provided by the Gun Trade Association. This introduces some uncertainty around the scale of business savings. Scenario analysis is used throughout.
Results of sensitivity analysis		…	There is some uncertainty around the estimates of volumes and savings to businesses. Scenario analysis is used throughout to account for this but given the overall value is low and NPSV is positive no further sensitivity has been undertaken.

Evidence base

A. Strategic objective and overview

Strategic objective

1. The strategic objective is to reduce unnecessary regulatory burdens while maintaining public safety within firearms licensing controls. Sound moderators are not dangerous in themselves, and evidence from consultation demonstrated that continued licensing did not contribute to public safety outcomes.

Background

2. Sound moderators are currently regulated as firearms under the Firearms Act 1968[7]. Their regulation requires certificate variations, police processing and dealer record-keeping.

3. The government has committed to bring forward legislation to remove an object known as a 'sound moderator' from the statutory definition of firearm set out in section 57[8] of the Firearms Act 1968. At present, a sound moderator can only be held lawfully if included on a firearms certificate issued by the police. As they are not of themselves dangerous, the government is seeking to change this.

Groups affected

4. Registered Firearms Dealers currently must include sound moderators in their processing of firearms certificates, which involves entering them into registers, providing security and notifying the police. Removing sound moderators from firearms licensing controls will save time and labour costs for Registered Firearms Dealers.

5. This will also save time for police, removing the requirement to vary certificates and to enter details on to the National Firearms Licensing Management System.

6. Further, individuals who purchase a firearm will no longer have to pay for a variation with the addition of a sound moderator, so they will also save money.

Consultation

7. On 21 February 2024, the previous government launched a public consultation seeking views on proposed changes to the law regulating the possession of sound moderators. Having considered all the responses, the current government concluded in its response published on 17 June 2025, that the continued regulation of sound moderators under existing firearms licensing controls served no public safety purpose[9].

8. The government did see merit in making it a requirement for a person to be in possession of a valid firearms certificate, issued by the police, to lawfully possess a sound moderator. This will ensure that these accessories are held lawfully only by those with a legitimate purpose and who have been subject to full suitability checks to possess a firearm. This would still remove the need for a firearms owner to apply to the police for a variation of their licence each time they acquire or dispose of a sound moderator.

---

7 Firearms Act 1968 - https://www.legislation.gov.uk/ukpga/1968/27/contents
8 Section 57, Firearms Act 1968 - https://www.legislation.gov.uk/ukpga/1968/27/section/57
9 Firearms licensing: sound moderators - https://www.gov.uk/government/consultations/firearms-licensing-sound-moderators

B. Problem under consideration, with business as usual, and rationale for intervention

9. Sound moderators are subject to control because they are specifically included in the definition of 'firearm' in the Firearms Act 1968[10]. This means that when purchasing sound moderators, certificate holders must pay an additional fee for a variation of a certificate, and police must spend time and resource processing this certificate.

10. In addition, Registered Firearms Dealers must take the time to enter sales into the wholesalers' and retailers' registers; provide appropriate security; transfer onto a certificate; and then notify to the police.

11. Based on the results of the consultation outlined in paragraph (7 and 8) it has been determined that sound moderators do not need to be subject to the same regulation as firearms. This means that the activity described above represents an unnecessary burden on policing, certificate holders and Registered Firearms Dealers.

C. Policy objective

12. As set out in Section 3, the objectives are:

    a. **Objective 1:** Remove police administrative burden by removing certificate variations and recording requirements for sound moderators.

    b. **Objective 2:** Remove the administrative burden on Registered Firearms Dealers of checking licences and recording transactions.

    c. **Objective 3:** Reduce unnecessary costs to firearms certificate holders.

D. Description of options considered

Option 0 - 'Do-nothing'

13. This would mean that sound moderators would still be defined as firearms in law by virtue of section 57(1)(d) of the Firearms Act 1968[11]. The consequence of this is that firearms certificate holders would continue to be required by law to apply to the police for a variation to their certificate, and to pay for that variation, to acquire or change possession of a sound moderator. Option 0 does not meet the government's objectives.

Option 1 - to remove sound moderators from the definition of 'firearm' under section 57 of the Firearms Act 1968

14. To insert a clause in the Crime and Policing Act 2026 to amend the definition of 'firearm' in section 57(1)(d) of the Firearms Act 1968 to remove sound moderators from that definition.

15. **Option 1 is the government's preferred option.**

[10] Firearms Act 1968 - https://www.legislation.gov.uk/ukpga/1968/27/contents
[11] Section 57(1)(d) of the Firearms Act 1968 - https://www.legislation.gov.uk/ukpga/1968/27/section/57B

Non-regulatory options

16. There are no non-regulatory options for this policy. Sound moderators are subject to control because they are specifically included in the definition of 'firearm' in the Firearms Act 1968. The only way to achieve the policy objective is to amend the definition in the 1968 Act. This can only be done by the government amending legislation.

E. NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

17. The monetised and non-monetised costs and benefits and NPSV of Option 0 are all 0.

18. The NPSV of Option 1 is estimated to be between £3.4 and £5.8 million, **with a central estimate of £4.5 million.** This positive NPSV is driven by the savings to Registered Firearms Dealers and individuals.

19. Table 1 below shows all key value for money metrics for the impacts of this measure.

Table 1: Total Costs, Benefits, NPSVs and EANDCBs (£m, Price year 2025/26, PV base year (2026/27))

	Low	Central	High
Total monetised costs	3.0	3.8	4.6
Total monetised benefits	6.5	8.4	10.4
NPSV	3.4	4.5	5.8
BNPV	0.4	0.7	1.2
HNPV	3.0	3.8	4.6
EANDCB	-0.05	-0.10	-0.16
EANDCH	-0.41	-0.52	-0.62

Source: Home Office Analysis

Summary of Impacts

Set up Costs

20. There are no monetised set up costs. If the removal of sound moderators from the definition of firearms is implemented, the changes would be incorporated into the non-statutory guide to firearms law[12] which is a public document and accessible by members of the public.

21. It is expected that these would not substantially change the length of the guidance and therefore there are no expected monetised costs to the police of familiarising themselves with this guidance.

Businesses

22. There is estimated to be a saving to Registered Firearms Dealers from time saved in processing moderator sales. It is estimated to be between £0.4 and £1.2 million with a central estimate of £0.7 million (PV). (See detail section F)

23. As there are no costs to businesses expected and only a small saving, the BNPV is estimated to be between £0.4 and £1.2 million with a central estimate of £0.7 million

[12] Guide on firearms licensing law - https://www.gov.uk/government/publications/firearms-law-guidance-to-the-police-2012/guide-on-firearms-licensing-law-accessible-version

(PV). The EANDCB is negative as there are only benefits to businesses. It is estimated to be between -£0.05 and -£0.16 million with a central estimate of -£0.10 million.

Households

24. There is estimated to be a saving to certificate holders purchasing sound moderators from no longer having to pay fees. It is estimated to be between £30 and £4.6 million with a central estimate of £3.8 million (PV). (See detail section G)

25. The overall saving to individuals who purchase sound moderators and HNPV is estimated to be between £3.0 and £4.6 million with a central estimate of £3.8 million (PV). The EANDCH is estimated to be between -£0.41 million and -£0.62 million with a central estimate of -£0.52 million. This represents one half of the transfer from policing to individuals.

Public Sector

26. The overall impact on policing is estimated to be £0.

27. If sound moderators are removed from the definition of firearms, the police will no longer receive the income from variation fees. However, it will also remove the requirement on the police to vary certificates to record acquisition or changes to sound moderators held by certificate holders and to enter details on to the National Firearms Licensing Management System.

28. In 2025, firearms licence fees were increased to achieve full cost recovery[13], meaning they were set to reflect the actual cost to policing of processing each licence. Therefore, the cost to policing of varying licences is estimated to be £47. This means the time saved to policing is estimated to be the same value as the fee income to policing.

29. There is a risk that in practice, the costs of processing variations may have risen since the 2025 firearms licence fees Impact Assessment so this may represent an overall saving to policing. However, precise current cost to policing is not known.

30. The annual number of sound moderators sold each year was estimated to be between 8,000 and 12,000 with a central estimate of 10,000[14].

31. The costs and benefits in year 1 are estimated to be lower as current implementation is expected in September 2026. It is assumed variations are evenly distributed across the year and so the saving would only occur for 50 per cent of annual sound moderator variations.

32. Table 2 below shows the estimated annual and 10-year total cost to policing from lost fee income.

[13] Firearms licensing fees: impact assessment - https://www.gov.uk/government/publications/changes-to-firearms-licensing-fees/firearms-licensing-fees-impact-assessment-accessible

[14] Estimated provided by the Gun Trade Association in 2024

Table 2 – Cost and benefit to Policing (£m, Price year 2025/26, PV base year 2026/27)

	2026/27	2027/28 Onwards	10 Year Total	10 Year Total (PV)
High	0.3	0.6	5.4	**4.6**
Central	0.2	0.5	4.5	**3.8**
Low	0.2	0.4	3.6	**3.0**

Source: Home Office Analysis

33. It is estimated that the cost to policing of lost fee income would between £3.0 and £4.6 million with a central estimate of £3.8 million (PV).

34. It is estimated that the saving to policing would be between £3.0 and £4.6 million with a central estimate of £3.8 million (PV).

35. The total impact to policing is therefore estimated to be £0.

F. Costs and benefits to business calculations

Costs to businesses

36. There are no expected costs to businesses.

Benefits to Business

Time saving to Registered Firearms Dealers

37. The Gun Trade Association advised that in addition to normal stock management, current Firearms Act 1968 requirements mean each moderator can be expected to be entered into the wholesalers' and retailers' registers; provided appropriate security; then transferred onto a certificate; and then notified to the police. It was estimated that this takes approximately 30 minutes per moderator processed.

38. There was no available data to directly estimate labour costs to Registered Firearms Dealers. The median salary of a Sales Administrator has been used as a proxy for salary and was uprated by 22 per cent to estimate the full labour cost[15].

39. To estimate the total saving to Registered Firearms Dealers, the estimated time taken to process sound moderators was multiplied by volumes of sound moderators sold each year and the estimated hourly labour cost.

40. Year 1 is estimated to generate a lower level of savings since this is expected to be implemented from September 2026. It is assumed variations are evenly distributed across the year and so the saving would only occur for 50 per cent of annual sound moderator variations.

41. Table 3 below shows the estimated annual and 10-year total savings to Registered Firearms Dealers

[15] Labour costs and non-wage share of labour cost - https://ec.europa.eu/eurostat/databrowser/view/lc_lci_lev/default/table?lang=en

Table 3 - Savings to Registered Firearms Dealers (£m, Price year 2025/26, PV base year 2026/27)

	2026/27	2027/28 Onwards	10 Year Total	10 Year Total (PV)
High	0.1	0.1	1.4	**1.2**
Central	0.0	0.1	0.9	**0.7**
Low	0.0	0.0	0.5	**0.4**

Source: Home Office Analysis

42. It is estimated that the saving to Registered Firearms Dealers would be between £0.4 million and £1.2 million with a central estimate of £0.7 million (PV).

G. Costs and benefits to households' calculations

Costs

43. There are no monetised costs to households.

Benefits

Saving to sound moderator purchasers from not paying the fee

44. If sound moderators are removed from the definition of firearms, individuals purchasing shotguns will no longer have to pay for a variation.

45. As with the cost to policing, the saving to individuals is estimated by multiplying the variation fee of £47 by the expected number of variations.

46. The saving in year 1 is estimated to be lower as current implementation is expected in September 2026. It is assumed variations are evenly distributed across the year and so the saving would only occur for 50 per cent of annual sound moderator variations.

47. Table 4 below shows the estimated annual and 10-year total benefit to individuals purchasing sound moderators.

Table 4 – Saving to Individuals Purchasing Sound Moderators (£m, Price year 2025/26, PV base year 2026/27)

	2026/27	2027/28 Onwards	10 Year Total	10 Year Total (PV)
High	0.3	0.6	5.4	**4.6**
Central	0.2	0.5	4.5	**3.8**
Low	0.2	0.4	3.6	**3.0**

Source: Home Office Analysis

48. It is estimated that the benefit to purchasers of sound moderators would between £3.0 and £4.6 million **with a central estimate of £3.8 million (PV).**

H. Business environment

49. This legislation is not estimated to have any significant impact on the business environment beyond those outlined in this Impact Assessment. This represents a small reduction in administrative burden for Registered Firearms Dealers.

I. Trade implications

50. This legislation is not estimated to have any significant impact on trade.

J. Environment: Natural capital impact and decarbonisation

51. This legislation is not estimated to have any significant impact on the Environment.

K. Other wider impacts (consider the impacts of your proposals)

52. There are not expected to be any impacts on businesses beyond those outlined in this Impact Assessment or any adverse impact on public safety.

53. No wider impact is expected in terms of the environment; social, regional, income and wealth distribution; household; protected characteristics; trade and investment.

L. Risks and assumptions

54. As specific data on Registered Firearms Dealers was not available, the analysis relies on assumptions provided by the Gun Trade Association. This introduces some uncertainty around the scale of business savings. However, the associated impact of this is low. The change results a small time saving per sound moderator for dealers, and there are no additional costs to businesses. Therefore, if there is variation from the estimate it would only be in scale of savings, the overall impact to businesses would still be positive.

55. Scenario analysis is used throughout to account for this but given the overall value is low and NPSV is positive no further sensitivity has been undertaken.

Annex

Mandatory specific impact test - Statutory Equalities Duties	Complete
The proposal to remove sound moderators from firearms licensing control was subject to a full public consultation. Simplifying the process by removing the requirement for sound moderators to be on a firearms certificate and approved by police forces, thereby saving money and time for all involved, was not considered as disadvantaging any persons involved in shooting activities, whether as a sport or a profession. The change in legislation will apply equally to people who share and people who do not share a relevant protected characteristic and was broadly welcomed by those who responded to the consultation. **The SRO has agreed these summary findings.**	**Yes**