

# A new approach to regulating shooting clubs and ranges

## Discussion document

Ministry of Justice

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MINISTRY OF  
JUSTICE  
*Tabu o te Ture*

**Te Kāwanatanga o Aotearoa**  
New Zealand Government

# Contents

|   |           |
|---|-----------|
| <b>Introduction .....</b>   | <b>1</b>  |
| Relationship between these proposals and other parts of the Government's firearms reform.....                 | 1         |
| About this document .....   | 1         |
| Information you provide in your submission will be secure .....   | 2         |
| How to make a submission on Phase 2 .....   | 3         |
| Useful background information .....   | 3         |
| Part 6 of the Arms Act 1983 relating to clubs and ranges .....  | 3         |
| What is the role of clubs and ranges? .....   | 3         |
| Definition of key terms .....   | 4         |
| <b>Part A: Pistol shooting clubs and the ranges they operate.....</b>   | <b>5</b>  |
| Background .....  | 5         |
| Pistol clubs must have a certificate of approval .....  | 5         |
| Pistol clubs also have a role to play in ensuring people are participating in their 12 annual shoots.....     | 6         |
| There are specific requirements for pistol clubs on whose behalf firearms and/or ammunition are sold .....    | 6         |
| Any ranges operated by a pistol club must be certified .....  | 6         |
| Range certificates are granted subject to conditions.....   | 7         |
| Range certificates must be renewed every five years.....  | 7         |
| There are tools to encourage compliance.....  | 7         |
| Issue .....   | 8         |
| Proposal .....  | 8         |
| Pistol clubs will continue to need approval, with some modifications .....                                    | 8         |
| Pistol clubs will need to keep records if firearms and/or ammunition are sold on their behalf .....           | 9         |
| Pistol ranges will continue to need certification every five years .....                                      | 9         |
| Security and storage requirements for pistol clubs and ranges will be modified.....                           | 9         |
| Tools will encourage compliance.....  | 9         |
| Questions .....   | 10        |
| <b>Part B: Non-pistol shooting clubs.....</b>   | <b>11</b> |
| Background .....  | 11        |
| There are specific requirements on non-pistol clubs on whose behalf firearms and/or ammunition are sold ..... | 11        |
| The issue .....   | 12        |

|   |           |
|---|-----------|
| The proposal.....   | 12        |
| Non-pistol clubs will need to enrol .....   | 12        |
| Security and storage requirements for non-pistol clubs will be modified .....   | 12        |
| Non-pistol clubs will need to be incorporated and keep records if firearms and/or<br>ammunition are sold on their behalf..... | 13        |
| Tools will encourage compliance.....  | 13        |
| Questions .....   | 14        |
| <b>Part C: Non-pistol shooting ranges .....</b>   | <b>15</b> |
| Background .....  | 15        |
| Non-pistol ranges must be certified .....   | 15        |
| Range certificates are granted subject to conditions.....   | 15        |
| Range certificates must be renewed every five years.....  | 16        |
| There are tools to encourage compliance.....  | 16        |
| The issue .....   | 16        |
| The proposal.....   | 16        |
| Non-pistol ranges will no longer need to be certified.....  | 16        |
| Security and storage requirements for non-pistol ranges will be modified.....   | 17        |
| Questions .....   | 17        |
| <b>Appendix 1: Key features of regulatory settings for shooting clubs and ranges over<br/>time.....</b>                       | <b>18</b> |

# Introduction

The Government has a broad and ambitious commitment to firearms reform this Parliamentary term. Hon Nicole McKee, Associate Minister of Justice, is leading this work.

This consultation focuses on the Government's proposed new approach to regulating clubs and ranges.

## Relationship between these proposals and other parts of the Government's firearms reform

The Government aims to deliver reform that:

- ensures public safety by enabling effective law enforcement tools
- supports licensed firearms owners to possess and use firearms safely, and
- is practical, modern, informed by evidence, and reflects best practice.

The Government is planning a programme of reform that will include:

- **Effective enforcement** – supporting the New Zealand Police by making improvements to firearm prohibition orders through the Firearms Prohibition Orders Amendment Legislation Bill, which is already before Select Committee.
- **Regulating shooting clubs and ranges, and other time-sensitive matters** – progressing immediate Government priorities.
- **Institutional arrangements for effective and efficient regulation** – focusing on a sizeable implementation programme.
- **A systematic rewrite to modernise the Arms Act 1983** – the final and large workstream to deliver a regime that provides for greater public safety, reflects best regulatory practice, and is fit for purpose.

This document supports consultation on policy proposals specific to regulating shooting clubs and ranges. There will be opportunities to provide input on subsequent work in due course.

## About this document

This document outlines an approach to regulating shooting clubs and ranges, and seeks your views on this approach. The key features are summarised in a table, alongside a summary of the current regulatory settings and the previous regulatory settings.

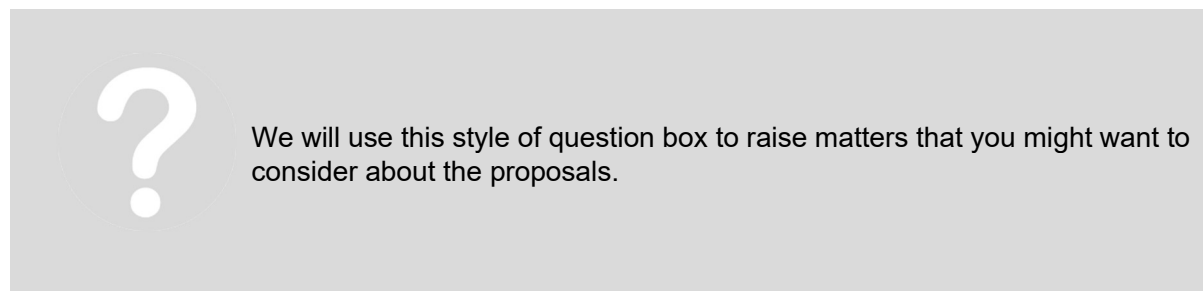
There are **four parts to this document**, setting out the proposals for clubs and ranges:

- |                    |   |
|--------------------|---|
| <b>Part A:</b>     | Pistol shooting clubs and the ranges they operate   |
| <b>Part B:</b>     | Non-pistol shooting clubs   |
| <b>Part C:</b>     | Non-pistol shooting ranges  |
| <b>Appendix 1:</b> | Table showing key features of pre-2020 regulatory settings, the current settings, and the proposed settings |

The policy proposals have been considered against **criteria** to ensure they:

- contribute to protecting the public and users from firearms-related harm
- are simple and easy to understand and apply
- are necessary to achieve the overarching objective
- protect individual freedoms and rights and the security and privacy of personal information, and
- provide for effective and efficient delivery of service.

Consultation provides you the opportunity to have your say on the new approach going forward. Throughout this document you will find highlighted boxes as follows, asking questions about each topic:



We will ask you what your views are on the specific proposals in Parts A, B and C of this document. We also invite you to share any further insights you may have on the issue statements included in these Parts, as well as any other suggestions for regulating shooting clubs and ranges.

You may wish to explain your answers and how they might relate back to the criteria above.

## **Information you provide in your submission will be secure**

The Privacy Act 2020 establishes certain principles with respect to the collection, use and disclosure of information about individuals by various agencies, including the Ministry of Justice. Any personal information you supply to the Ministry in the course of making a submission will only be used for the purpose of assisting in the development of policy advice in relation to the Government's firearms reform programme.

Your submission remains subject to request under the Official Information Act 1982. Please set out clearly in the letter or email of your submission if you have any objection to the release of any information in your submission, and in particular, which parts you consider should be withheld, together with the reasons for withholding the information. The Ministry of Justice will take any objections into account and will consult with you when responding to requests under the Official Information Act 1982.

## How to make a submission on Phase 2

There are a number of ways you can provide a submission as part of this consultation process. You can download and read the consultation document, and email a submission to [firearms@justice.govt.nz](mailto:firearms@justice.govt.nz).

Alternatively, you can mail your submission to the following address:

Harm Reduction and Public Safety  
Policy Group  
Justice Centre  
19 Aitken Street, Thorndon  
DX SX10088  
Wellington 6021  
New Zealand

Please send us your views by **21 June 2024**. However, if you need more time to provide feedback, please let us know as soon as possible and we may be able to accommodate this.

## Useful background information

### Part 6 of the Arms Act 1983 relating to clubs and ranges

The purpose of the Arms Act 1983 (the Act) is to promote the safe possession and use of firearms and other weapons, and impose controls on the possession and use of firearms and other weapons.

This is achieved through the regulatory regime for the possession and use of firearms, which reflects that:

- the possession and use of arms is a privilege, and
- persons authorised to import, manufacture, supply, sell, possess, or use arms have a responsibility to act in the interests of personal and public safety.

In 2020, the Arms Legislation Act introduced Part 6 to the Act. Part 6 regulates shooting clubs and ranges, as part of the broader regulatory regime. Part 6 requires shooting clubs to be approved and shooting ranges to be certified.

### What is the role of clubs and ranges?

Clubs and ranges have an important public safety role. They are places for people learning to operate firearms safely and to practice and compete. Ranges are also safe places for people to accurately sight-in rifles before hunting, without which hunters (who are contributing to conservation efforts) pose an unnecessary risk when they are outdoors. A properly sighted rifle also contributes to the humane dispatch of game animals and pests. Clubs and ranges can also serve as places for social gatherings.

Everybody involved in clubs and ranges wants to ensure they are run properly. The general public also has an interest in ensuring that clubs and ranges are supported to run well.

The Government considers the current requirements go beyond what is needed to ensure public safety. This impacts the people running clubs and ranges (many of whom are volunteers) and the people who want to participate in shooting activities. The priority is to lessen the regulatory burden on clubs and ranges, making the law practical for users, without compromising individual and public safety.

## Definition of key terms

A **shooting club** is a voluntary association of people who act in accordance with a set of written rules and participate in shooting activities on a regular basis.

A **shooting range** is an indoor or outdoor facility or designated area of land used by a shooting club or members of the public for carrying out shooting activities. This includes any defence area (an area used or occupied by the New Zealand Defence Force) used by a shooting club.

**Shooting activities** are carried out with a firearm or airgun to shoot at inanimate targets, but exclude paintball shooting and airsoft shooting.

An **arms item** means any item of the following classes:

- firearms (including prohibited firearms)
- magazines (including prohibited magazines)
- parts (including prohibited parts)
- airguns
- pistols
- restricted weapons, and
- pistol carbine conversion kits.

# Part A: Pistol shooting clubs and the ranges they operate

## Background

There has traditionally been greater oversight of pistol clubs. Pistols pose particular risks because they can be easily concealed, so are desirable for illegal use. Pistols can only be lawfully used for target pistol shooting, and firearms licence holders need a pistol shooting endorsement to be able to use pistols. There are strict conditions in place for people who do not hold a firearms licence and pistol endorsement to try pistol shooting in a club environment.

## Pistol clubs must have a certificate of approval

Currently, pistol clubs must have a certificate of approval to operate, and must be registered as an incorporated society. It is an offence to run a pistol club without it being approved – anyone in breach of this offence can be fined up to \$10,000.

The initial approval application fee is \$140 and the annual fee is \$30 or \$40 – the larger fee is payable if ammunition and/or firearms are sold on a club's behalf.

A pistol club maintains its approved status unless the club surrenders its certificate, or it is cancelled by the regulator (currently the Firearms Safety Authority). Cancellation may occur if the club is no longer operating, or it fails to meet conditions of its approval. Conditions include:

- continuing to be registered as an incorporated society
- notifying the regulator if a person joins the club as a new member, the club declines a person's membership application or a person ceases to be a club member
- ensuring no one disqualified from holding a firearms licence, has had a firearms licence revoked, or has had an endorsement on their firearms licence revoked within the previous five years, is a member of the club's committee
- notifying a change in the contact person for the club
- ensuring the security of premises used by shooting clubs if firearms and/or ammunition are stored on the premises
- ensuring secure storage facilities are available on premises used by shooting clubs, if any firearms and/or ammunition are stored on the premises
- abiding by conditions relating to participation of young club members and people who do not hold a firearms licence or do not hold a pistol endorsement, and
- maintaining a record of incidents and safety breaches that occur during shooting activity for at least five years.

A pistol shooting club must provide the regulator with an annual report on its operations detailing changes to the club's constitution or rules or the club's officers (since the club applied



for its approval or since the last annual report), and minutes of the club's last annual general meeting (AGM). This must also include:

- the names of all club members and their firearms licence numbers (if applicable)
- a list of shooting activities organised by the club that were held during the financial year, and the location of those activities, and
- a list of the shooting activities organised by the club planned to be held in the following financial year, and the location of those activities.

## **Pistol clubs also have a role to play in ensuring people are participating in their 12 annual shoots**

Pistol clubs must also keep a record of the shooting activities organised by the club each year, and provide this to the regulator no later than 28 days after the end of the year (1 July – 30 June). A person who has an endorsement to their licence permitting them to possess a pistol must participate in a scheduled shooting activity organised by the pistol shooting club they belong to, on the pistol ranges used by that club, on at least 12 days in the year.

## **There are specific requirements for pistol clubs on whose behalf firearms and/or ammunition are sold**

It is relatively common practice for firearms and/or ammunition to be sold on a club's behalf to club members or others using the club. This allows clubs to pass on bulk-purchase savings for ammunitions to their members and to fundraise. It is also convenient to members and people using the club.

A pistol shooting club in this position must provide financial information as part of its annual report. If ammunition is sold, the club must also keep records of these sales for 10 years, including information about the seller and purchaser, their firearms licence numbers, where applicable, and the quantity and type of ammunition.

The sale of firearms by licence holders acting on behalf of the club must be recorded against the individual licence holder(s) possessing the firearms. This is the same as the requirement on individuals selling firearms in other contexts and there is no extra obligation required of clubs to record this information.

## **Any ranges operated by a pistol club must be certified**

It is an offence to operate a pistol range unless it is certified – anyone in breach of this offence can be fined up to \$10,000.

When making an application for certification to the regulator, the application must include information like:

- the name and contact details of the applicant and of the range operator and their firearms licence number
- the name and address of the shooting range premises used by the club

- a topographical map number and co-ordinates on that map of the shooting range
- the types of firearms and the maximum calibre to be used at each shooting range, and
- a declaration that all necessary territorial authority and regional council consents in respect of the shooting range have been obtained, and the consent of any affected landowners has been given.

The application must also include a copy of the range standing orders for the range premises, and a copy of an inspection report undertaken by a recognised range inspector.

The initial application fee is \$400 for a single range on a site (plus \$45 for each additional range up to maximum of \$625). The fee for a clay target shooting range is \$400, and for a one-time-use range is \$250.

## **Range certificates are granted subject to conditions**

A range operator must comply with conditions of the certificate, including:

- notifying a change in the contact person for the range
- maintaining a record of the officers who are on duty at the range
- maintaining range standing orders for each shooting range approved by the regulator
- ensuring the security of shooting range if firearms and/or ammunition are stored on the premises
- ensuring secure storage facilities are available on shooting range premises if any firearms and/or ammunition are stored on the premises, and
- maintaining an up-to-date record of any incidents or safety breaches that have occurred on any shooting range operated by them.

## **Range certificates must be renewed every five years**

Range certificates must be renewed every five years. However, if the operator intends to use the range in a different way from their application, they must request a review of the certification ahead of this time.

If there has been no significant change to design, construction or operation, the fee is \$200. If there has been a significant change, the renewal fee is the same as an application fee and will depend on the number of ranges on the site.

## **There are tools to encourage compliance**

The regulator can enter and inspect any shooting range (or a shooting club that is part of a range), or any place where a shooting club stores firearms or ammunition for the purpose of ensuring the shooting club or shooting range is operated in accordance with the Act, with at least seven days' notice. The regulator can also inspect print, copy, or remove any documents they reasonably believe belong to the shooting club or shooting range.

The regulator can also:

- issue an improvement notice, if they believe that the shooting club or shooting range is failing with any condition of its certificate of approval or is contravening a provision of the Act or the Arms Regulations 1992 (the Regulations). The improvement notice must specify a reasonable period of time for the club or range to remedy the problem.
- temporarily suspend the shooting club's operations pending possible cancellation of certificate of approval – if satisfied that the club has failed to comply with an improvement notice
- temporarily suspend the range's operations pending possible cancellation of certification – if satisfied that the range has failed to comply with an improvement notice
- bring prosecution for pistol clubs that are not approved, and pistol ranges that are not certified.

## Issue

The safety risks associated with the misuse of pistols, and the threat of pistols falling into the wrong hands, supports maintaining regulatory oversight. Regulatory oversight of pistol clubs and the ranges they operate helps with enforceability and consistency between pistol clubs and the activities they operate, including pistol shooting by licence holders possessing a pistol endorsement on their licence. This has enabled pistol shooting activities to continue safely across the country. However, the Government considers that unnecessary regulatory burden impacts pistol clubs and ranges, and people who want to participate in pistol shooting activities.

## Proposal

### Pistol clubs will continue to need approval, with some modifications

The proposed new approach is to retain approval requirements and ongoing obligations for pistol clubs but to:

- change the participation requirement so that participation at any organised pistol club or pistol shooting competition event which is recorded in the host club's calendar will count toward the 12 events per year requirement for pistol club members
- streamline reporting requirements for pistol clubs, by:
  - requiring a club provides its participation records as part of its annual report, and
  - requiring that all annual reports are due within 60 days of the end of the period 1 July – 30 June.

## Pistol clubs will need to keep records if firearms and/or ammunition are sold on their behalf

The overall approach for pistol clubs maintains the requirement for a club that sells firearms or ammunition to be incorporated. In addition, pistol clubs on whose behalf firearms and/or ammunition are sold will also need to keep a record of ammunition sales sold by a club member to another club member, or on the premises used by the club to any person, for five years (reduced from the current 10-year requirement). The record must include:

- the name and firearms licence number of the seller
- the name of the purchaser and their firearms licence number (or the name and firearms licence number of their immediate supervisor if they are not licensed), and
- the quantity and type of ammunition sold.

The club will no longer need to provide financial information to the regulator on these sales annually.

## Pistol ranges will continue to need certification every five years

The proposed approach is to retain certification requirements, including ongoing requirements, for ranges operated by pistol clubs. Certification will still need to be renewed every five years.

## Security and storage requirements for pistol clubs and ranges will be modified

The proposed approach will amend the security and storage requirements for pistol clubs and ranges so that:

- the requirements only apply to a club storing (non-pistol) firearms and/or ammunition *overnight* – currently they apply if those firearms and/or ammunition are on the premises and not in the physical possession of a firearms licence holder, and
- pistols, pistol magazines, and pistol carbine conversion kits can only be stored overnight on the premises used by the shooting club with the consent of the *regulator* – currently consent of the Police is required.

This proposal will still require clubs and range operators to maintain an up-to-date record of any incidents or safety breaches that have occurred on a range that did not result in injury to, or death of, any person but had the potential to do so, and keep this record for five years.

## Tools will encourage compliance

Under the proposed approach, the regulator would have the ability to:

- enter and inspect (after giving at least seven days' notice)
  - a pistol shooting range (including any shooting club that is part of a range)
  - any place where the shooting club stores firearms or ammunition

- inspect, print, copy documents belonging to a pistol club (after giving notice)
- remove hard copy documents belonging to a pistol club (after giving notice)
- issue improvement notices against a pistol club
- temporarily suspend a pistol club's operations
- temporarily suspend a shooting range's operations, and
- cancel the pistol club's certificate of approval.

You may wish to consider the appropriateness of offences that apply to pistol clubs and ranges. The maximum penalty for pistol clubs that are not approved, and for ranges that are not certified, is \$10,000. Things you might take into account when considering an appropriate penalty can include:

- the harm caused and the nature of the conduct
- if the penalty will effectively deter the conduct
- if the option is workable and appropriate to the regulated group, and
- that the penalty should be fair.

## Questions



- Do you agree with the issue statement for pistol clubs and ranges? What insights can you share that might help us understand the issue better?
- What are your views on retaining the approval requirements for pistol clubs?
- What are your views on maintaining the renewal period for pistol ranges at every five years?
- What are your views on changing the security and safe storage conditions in this way?
- What are your views on the regulator maintaining the compliance tools?
- What do you think of maintaining an offence for pistol clubs that operate without approval, and ranges that operate without certification? Do you agree with a maximum penalty amount of \$10,000?
- Will the proposals ensure the safe possession and use of firearms within pistol shooting clubs and on pistol shooting ranges?
- Do you agree with the overall policy proposals for pistol clubs and ranges? What other suggestions do you have for regulating pistol clubs and ranges?

# Part B: Non-pistol shooting clubs

## Background

Currently, non-pistol clubs must have a certificate of approval to operate. It is an offence to run a non-pistol club without it being approved – anyone in breach of this offence can be fined up to \$10,000. The initial application fee is \$140 and the ongoing fee is \$30 or \$40 depending on whether the ammunition or firearms are sold on a club's behalf.

Clubs maintain their approved status unless they surrender the certificate, or it is cancelled by the regulator. Cancellation may occur if the club is no longer operating, it fails to meet conditions of its approval. Conditions include:

- maintaining a list of all current club members and their firearms licence numbers (if applicable)
- ensuring no one disqualified from holding a firearms licence or who has had a firearms licence revoked within the previous five years is a member of the club's committee
- notifying of a change in the contact person for the club
- ensuring the security of premises used by shooting clubs if firearms and/or ammunition are stored on their premises
- ensuring secure storage facilities are available on premises used by shooting clubs if any firearms and/or ammunition are stored on their premises and not in the physical possession of a firearms licence holder, and
- maintaining a record of incidents and safety breaches that occur during shooting activities for at least five years.

A shooting club must provide the regulator with an annual report on its operations detailing changes to the club's constitution or rules or the club's officers (since the club applied for its approval or since the last annual report), and minutes of the club's last AGM.

## There are specific requirements on non-pistol clubs on whose behalf firearms and/or ammunition are sold

A non-pistol club on whose behalf firearms and/or ammunition are sold must be an incorporated society and provide financial information as part of its annual report. If ammunition is sold, the club must also keep records of these sales for 10 years, including information about the seller and purchaser, their firearms licence numbers, where applicable, and the quantity and type of ammunition. There are no separate requirements on clubs on whose behalf firearms are sold – those transactions should be registered in the Firearms Registry against an individual licence holder, as they are in other contexts.

# The issue

The Government has heard that the ongoing requirements are raising concerns amongst the volunteers running non-pistol clubs across the country, who are eager to ensure they are complying with the law.

The Government considers that the current requirements do not support clubs in the same way, and that this could undermine public safety in the long run. If the law is too complex, people who currently run clubs (who are volunteers) may decide not to continue. This risks the future of clubs being available as places for people to learn and practice shooting within a safe environment.

# The proposal

## Non-pistol clubs will need to enrol

The proposal is to remove the requirement for non-pistol clubs to be approved. Instead, there will be a new system of enrolment requiring non-pistol clubs to provide the regulator with the following details:

- the names of the club's officers
- confirmation of whether the club is incorporated and, if so, the society's number
- the shooting discipline or disciplines the club uses
- the names and addresses of shooting ranges the club uses, and
- information about whether firearms or ammunition will be stored at premises or shooting ranges used by the club.

An enrolled non-pistol club will be required to update its enrolment details when those details change, but it will no longer be required to produce an annual report. If a club ceases operating, it will be required to un-enrol.

Non-pistol clubs currently certified under Part 6 of the Act will automatically be enrolled when the new provisions come into force, making the transition as straightforward as possible.

## Security and storage requirements for non-pistol clubs will be modified

Similar to the proposal for pistol clubs and ranges, if a non-pistol shooting club holds firearms and/or ammunition overnight on its premises, the club must ensure:

- the premises are structurally sound and secure against unlawful entry, and
- the premises have storage facilities to enable secure storage of the firearms and/or ammunition.

The non-pistol club will also have to maintain an up-to-date record of any incidents or safety breaches that have occurred during any shooting activity organised by the club and that did not result in injury to, or the death of, any persons but had the potential to do so, and keep this record for five years.

## **Non-pistol clubs will need to be incorporated and keep records if firearms and/or ammunition are sold on their behalf**

If firearms and/or ammunition is sold on the non-pistol club's behalf, the club will have to:

- be registered as an incorporated society
- keep a record of ammunition sales sold by a club member to another club member, or on the premises used by the club to any person, for five years (reduced from the current 10-year requirement), which is to include:
  - the name and firearms licence number of the seller
  - the name of the purchaser and their firearms licence number (or the name and firearms licence number of their immediate supervisor if they are not licensed), and
  - the quantity and type of ammunition sold.

However, the club will not need to provide an annual financial report relating to the sales of firearms or ammunition.

The alternative to maintaining the requirement for a club that sells firearms and/or ammunition to be incorporated, is for that club to be subject to dealer requirements.

## **Tools will encourage compliance**

The regulator will have the ability to:

- enter and inspect a non-pistol club that is part of a range or that stores firearms and/or ammunitions (after giving notice)
- inspect, print, or copy documents belonging to the club (after giving notice), and
- remove hard copy documents belonging to the club (after giving notice).

The regulator will not have the ability to:

- issue improvement notices
- temporarily suspend a club's operations, or
- cancel a club's enrolment.

The proposal includes an offence for a non-pistol shooting club to operate if it is not enrolled.

The maximum penalty under the current system for non-pistol clubs that are not approved is \$10,000. Things you might take into account when considering an appropriate penalty under the new enrolment system can include:

- the harm caused and the nature of the conduct
- if the penalty will effectively deter the conduct
- if the option is workable and appropriate to the regulated group, and
- that the penalty should be fair.



# Questions



- Do you agree with the issue statement for non-pistol clubs? What insights can you share that might help us understand the issue better?
- What are your views on the proposed system of enrolment, to replace the current approval process?
- Should a club continue to be required to be an incorporated society when firearms and/or ammunition are sold on its behalf?
- What are your views on the enforcement mechanisms that would be available to ensure compliance with enrolment?
- What do you think about the proposed offence for non-pistol clubs that operate without being enrolled? Do you agree with a maximum penalty amount of \$10,000?
- Will the proposals ensure the safe possession and use of firearms within non-pistol shooting clubs?
- Do you agree with the overall policy proposals for non-pistol clubs? What other suggestions do you have for regulating non-pistol clubs?

# Part C: Non-pistol shooting ranges

## Background

### Non-pistol ranges must be certified

It is currently an offence to operate a non-pistol range if it is not certified – anyone in breach of this offence can be fined up to \$10,000.

When making an application for certification to the regulator, the application must include information like:

- the name and contact details of the applicant and of the range operator and their firearms licence number
- the name and address of the shooting range
- a topographical map number and co-ordinates on that map of the shooting range
- the types of firearms and the maximum calibre to be used at the range, and
- a declaration that all necessary territorial authority and regional council consents in respect of the shooting range have been obtained, and the consent of any affected landowners has been given.

The application must also include a copy of the range standing orders for the range, and a copy of an inspection report undertaken by a recognised range inspector.

The initial application fees is \$400 for a single range on a site (plus \$45 for each additional range up to maximum of \$625). The fee for a clay target shooting range is \$400, and for a one-time-use range is \$250.

### Range certificates are granted subject to conditions

When operating the shooting range, the range operator must comply with conditions of the certificate, including:

- giving notice of a change in the contact person for the range
- maintaining a record of the officers who are on duty at the range
- maintaining range standing orders for the shooting range approved by the regulator
- ensuring the security of shooting range premises if firearms and/or ammunition are stored on their premises
- ensuring secure storage facilities are available on shooting range premises if any firearms and/or ammunition are stored on their premises, and
- maintaining an up-to-date record of any incidents or safety breaches that have occurred on any shooting range operated by them.

## **Range certificates must be renewed every five years**

Non-pistol range certificates must be renewed every five years. However, if the operator intends to use the range in a different way from their application, they must request a review of the certification ahead of this time.

If there has been no significant change to design, construction or operation, the fee is \$200. If there has been a significant change, the renewal fee is the same as an application fee and will depend on the number of ranges on the site.

## **There are tools to encourage compliance**

The regulator has the ability to:

- enter and inspect a shooting range
- inspect, print, copy, or remove any documents that the regulator believes to belong to a shooting range
- issue an improvement notice, if they believe that the range is failing with any condition of its certificate of approval or is contravening a provision of the Act or the Regulations
- temporarily suspend the range's operations pending possible cancellation of certification – if satisfied that the range has failed to comply with an improvement notice
- cancel the range's certificate, including when the range is no longer operating, or if it is being operated without proper regard to individual or public safety, or if the operator is not complying with the conditions of the range's certificate, or if the operator has failed to comply with an improvement notice.

## **The issue**

The safety risks of non-pistol ranges are not considered to outweigh the compliance burden of certification and five-yearly renewals. The process can be costly and time-consuming.

Before 2020, non-pistol ranges were overseen by a governing body, or a parent organisation. Police also issued a Range Manual which provided guidelines for operating a range safely. There was no evidence to suggest that non-pistol ranges were operating unsafely under that system. This may have been as effective, with less overall burden for operators.

## **The proposal**

### **Non-pistol ranges will no longer need to be certified**

The proposal is to remove certification for non-pistol ranges. Instead, the proposal will require non-pistol ranges to comply with shooting range standing orders approved by a governing body or, for range operators not affiliated to a club or association, by the regulator.

## Security and storage requirements for non-pistol ranges will be modified

Like the proposal for security and storage requirements relating to pistol clubs and ranges, this proposal will require that if firearms and/or ammunition are stored overnight on a shooting range, the range operator must ensure:

- the premises are structurally sound and secure against unlawful entry, and
- the premises have storage facilities to enable secure storage of the firearms and/or ammunition.

The range operator will need to maintain an up-to-date record of any incidents or safety breaches that have occurred during any shooting activity organised by the club and that did not result in injury to, or the death of, any persons but had the potential to do so, and keep this record for five years.

This proposal does not include an offence and penalty that applies to non-pistol ranges.

## Questions



- Do you agree with the issue statement for non-pistol ranges? What insights can you share that might help us understand the issue better?
- What are your views on removing certification for non-pistol ranges?
- What are your views on requiring non-pistol ranges to comply with shooting range standing orders approved by a governing body?
- Do you think that the regulator should have any compliance tools to ensure non-pistol ranges are operating according to their range standing orders? If so, what tools and to what extent? (You can refer to the range of compliance tools set out in Parts A and B of this document).
- Will the proposals ensure the safe possession and use of firearms at non-pistol ranges?
- Do you agree with the overall policy proposals for non-pistol ranges? What other suggestions do you have for regulating non-pistol ranges?

# Appendix 1: Key features of regulatory settings for shooting clubs and ranges over time

|                                | REGULATORY SETTINGS FOR SHOOTING CLUBS AND RANGES  |  |  |
|--------------------------------|--|--|--|
|                                | PRE-ARMS LEGISLATION ACT 2020  | CURRENT  | PROPOSED   |
| <b>Pistol clubs and ranges</b> | <ul style="list-style-type: none"> <li>Licence holders with target shooting pistol endorsements had to participate in 12 shoots per year – this could be at any event hosted by clubs affiliated with Pistol New Zealand, or any internationally-sanctioned pistol shooting competition overseas</li> <li>Pistol clubs were required to be incorporated societies and recognised by the Police Commissioner – people could only lawfully shoot pistols on pistol ranges recognised by the Police Commissioner</li> <li>Standards and expectations for operating were set out in a Letter of Agreement between Police and Pistol New Zealand</li> <li>Police had limited powers for monitoring and enforcement</li> </ul> | <ul style="list-style-type: none"> <li>Licence holders with target shooting pistol endorsements must participate in 12 shoots per year only at events organised the pistol club of which the person is a member, on the pistol ranges used by that club</li> <li>Pistol clubs are required to be incorporated societies and must be approved to operate – it's an offence to operate without approval</li> <li>Pistol ranges are required to be certified to operate, with certification needing to be renewed every five years</li> <li>Standards and expectations for operating are set out in the Act and Regulations</li> <li>Security and storage requirements are in place for pistol clubs and ranges that store firearms and/or ammunition</li> <li>Pistol clubs that sell ammunition are required to keep records of sales for 10 years</li> <li>Police have comprehensive powers for monitoring and enforcement</li> </ul> | <ul style="list-style-type: none"> <li>Licence holders with pistol endorsements will need to continue to participate in 12 shoots per year – this could be at any organised club or pistol shooting competition event recorded in the host club's calendar</li> <li>The proposed approach for regulating pistol clubs will remain largely the same as current settings, with streamlined reporting requirements</li> <li>It will remain an offence to operate a pistol club that is not approved or a pistol range that is not certified</li> <li>Approved security and storage requirements will still be mandatory – prioritising the storage of firearms and/or ammunition overnight</li> <li>If firearms and/or ammunition are sold on a pistol club's behalf, the club will be required to keep records of ammunition sales for five years</li> <li>Monitoring and enforcement powers remain the same except that only hard copy documents can be removed from clubs</li> </ul> |
| <b>Non-pistol clubs</b>        | <ul style="list-style-type: none"> <li>System of self-regulation, with many non-pistol clubs affiliated to a governing body, which provided a framework for operating</li> <li>No requirements were set out in legislation</li> <li>Police had limited powers for monitoring and enforcement</li> </ul>  | <ul style="list-style-type: none"> <li>Non-pistol clubs must be approved to operate – it's an offence to operate without approval</li> <li>Non-pistol clubs that sell ammunition must be incorporated societies</li> <li>Standards and expectations for operating are set out in the Act and Regulations</li> <li>Security and storage requirements are in place for non-pistol clubs that store firearms and/or ammunition</li> <li>Non-pistol clubs that sell ammunition are required to keep records of sales for 10 years</li> <li>Police have comprehensive powers for monitoring and enforcement</li> </ul>  | <ul style="list-style-type: none"> <li>Non-pistol clubs will have to enrol to operate</li> <li>Remaining requirements for operating will be streamlined and set out in the Act and Regulations</li> <li>It will remain an offence to operate a non-pistol club that is not enrolled</li> <li>Approved security and storage requirements will still be mandatory – where the storage of firearms and/or ammunition is intended for overnight use</li> <li>If firearms and/or ammunition are sold on a non-pistol club's behalf, the club will be required to be incorporated, and keep records of ammunition sales for five years</li> <li>Police/regulator will retain some powers for monitoring and enforcement</li> </ul>   |
| <b>Non-pistol ranges</b>       | <ul style="list-style-type: none"> <li>System of self-regulation: many overseen by a governing body, and a Range Manual, published by New Zealand Police, provided safety guidelines for operating</li> <li>No requirements were set out in legislation</li> <li>Police had limited powers for monitoring and enforcement</li> </ul>   | <ul style="list-style-type: none"> <li>Non-pistol ranges are required to be certified to operate</li> <li>Standards and expectations for operating are set out in the Act and Regulations</li> <li>Security and storage requirements are in place for non-pistol ranges that store firearms and/or ammunition</li> <li>Police have comprehensive powers for monitoring and enforcement</li> </ul>  | <ul style="list-style-type: none"> <li>Non-pistol ranges will no longer need to be certified to operate</li> <li>System of self-regulation will be in place. Non-pistol range Standing Orders will be approved by a governing body or parent organisation or by the regulator (for non-affiliated ranges)</li> <li>A document, like the Range Manual, will have a role to play to ensure ranges are operating safely</li> <li>Approved security and storage requirements will still be mandatory – where the storage of firearms and/or ammunition is intended for overnight use</li> <li>Police/regulator will have limited powers for monitoring and enforcement</li> </ul>  |

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