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Ministry of Justice
Harm Reduction and Public Safety
Policy Group
Justice Centre, 19 Aitken Street
Thorndon, Wellington 6021



By email: firearms@justice.govt.nz and post

NZDA SUBMISSION FOR CONSULTATION ON A NEW APPROACH TO REGULATING SHOOTING CLUBS AND RANGES

New Zealand Deerstalkers Association Inc (NZDA) advocates on behalf of New Zealand's recreational hunters and shooters. NZDA welcomes this discussion and supports a new approach to regulating shooting clubs and ranges.

NZDA is the umbrella shooting organisation of our 48 branches, which are regulated by the current clubs and ranges system. Our clubs are directly affected by these proposals.

We have encouraged our clubs with ranges to submit with respect to this discussion document based on their local experiences because, while NZDA holds a shooting club certification, we are not a range operator and have not had to comply with the range regulations in the manner and extent of our local clubs.

By way of background to NZDA, we operate one of the largest shooting range networks in the country, which, as an NGO, are open to the public, communities, and members alike. We are also the only organisation to offer nation-wide firearms and hunter safety training through our HUNTS course. We sit on the Firearms Community Advisory Forum (FCAF), the Recreational Firearms Users Working Group, and the Range Certification Engagement Group (RCEG). We also have committed a large volunteer contingent to be upskilled as Police endorsed Range Safety Inspectors (RSIs), which have formed the largest cohort of RSIs of any range operator stakeholder.

NZDA and our branches are a 'non-pistol shooting club' as defined in the discussion document, and we note that we seek to reflect the concerns of our 12,000 members, 600 committee members, 38,000 supporters and 48 branches who are directly impacted by these proposals.

NZDA's fundamental purpose is to protect the traditions of recreational hunting while protecting, advancing and advocating for the rights of recreational hunters and shooters. NZDA fervently opposes policies that will reduce lawful access to firearms or which will result in increased and unnecessary administration for licenced firearm owners and the shooting clubs they are members of.

NZDA supports a firearms regulation framework that protects law-abiding users and does not apply penalties or 'red-tape' costs to those owners and which guarantees efficiency and safety.

NZDA's overarching position and submission is that any regulation of clubs and ranges should reflect NZDA policies and, importantly, section 1A(2)(b) of the Arms Act 1983 (inserted, on 25 June 2020, by section 5 of the Arms Legislation Act 2020 (2020 No 23).) which states that the regulatory regime should imbue the principle that any decisions by the Regulator (i.e. Police and/or. Justice) need to result in an outcome that is "in the interests of personal and public safety", therefore any new regulation must demonstrably achieve that principle for it to be supported by NZDA.

NZDA welcomes the review of regulations put on shooting clubs so it can be determined if it has directly contributed to enhancing safety for users and the general public. The NZDA experience is that our clubs already operated safely voluntarily, and this assertion is grounded in the understanding that the act of registration itself does not inherently improve operational safety practices or compliance with safety norms. Historical data from New Zealand shooting ranges, particularly those operated by the NZDA, demonstrate a longstanding record of safe operation with minimal incidents. This suggests that these clubs already implement effective safety measures and adhere to rigorous standards voluntarily. Given this context, the necessity of government-imposed registration becomes questionable. If ranges are proven to be run safely and responsibly, as evidenced by the low incidence of accidents and adherence to the Firearms Safety Code, the additional layer of regulatory oversight through registration may introduce unnecessary bureaucratic burdens without yielding significant improvements in safety outcomes. It raises a fundamental question: why impose a regulatory requirement that does not correlate with an increase in safety but potentially diverts resources and attention from proven safety practices already in place?

I would be happy to meet with Justice to speak to this submission and answer any questions or concerns you may have.

For and on behalf of NZDA by,



Gwyn Thurlow, NZDA Chief Executive and General Counsel

NZDA SUBMISSION ON PROPOSALS AND QUESTIONS ON THE DISCUSSION DOCUMENT:

A New Approach to Regulating Shooting Clubs and Ranges

Question	Submission Position	Explanation
Part A: Pistol		
Part A: Pistol shooting clubs and the ranges they operate questions.	NZDA supports Pistol NZ's submissions.	Although NZDA is not a pistol club, many of our shooting clubs share facilities with pistol clubs at ranges used and operated by our members. Therefore, we do not make specific submissions on the Part A questions, other than to say we support pistol shooting as a legitimate activity.
Part B: Non-pistol shooting clubs		
Do you agree with the issue statement for non-pistol clubs? What insights can you share that might help us understand the issue better?	<p>Yes, NZDA agrees.</p> <p>NZDA fully supports the government's issue statement regarding the regulatory challenges faced by non-pistol clubs across the country. As the leading organisation representing recreational hunters and shooters in New Zealand, we are acutely aware of the concerns among the volunteers who diligently run these clubs.</p>	<p>NZDA can confirm the administrative challenges faced by our volunteer-run clubs. NZDA and our ranges play a vital role in fostering a safe and responsible shooting culture across New Zealand. By fostering a regulatory environment that supports our volunteers and ensures the continued operation of non-pistol clubs, we can maintain the tradition of safe and responsible shooting practices across New Zealand.</p> <p>Our experience underscores that the current regulatory framework can indeed be burdensome for the volunteers who are the backbone of our clubs. These individuals dedicate their time and energy to ensure safe and legal operations, yet they often grapple with complex requirements that can be discouraging. The potential for such complexity to deter volunteers poses a real threat to the sustainability of these clubs, which play a critical role in our communities by providing safe environments for shooting practices and education.</p>

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		<p>It's clear that the current regulatory framework is overly complex and daunting for the volunteers who are crucial to the operation of these clubs. The NZDA has consistently highlighted how this complexity not only demands a disproportionate amount of time and resources from club administrators but also acts as a deterrent for potential volunteers. This deterrent effect threatens the sustainability of clubs, particularly smaller ones, which struggle the most with compliance due to limited resources.</p> <p>Part 6, as it operates, has, and will, 'freeze in time' the ranges and club network that exists now. Very few new ranges, if any, and shooting clubs will form because they need to comply with the Incorporated Societies Act process and the Arms Act Part 6 process concurrently, in addition to getting planning approvals from territorial authorities. If ranges close or new ones fail to open, NZDA questions who will provide the facilities for safe shooting activities for New Zealand's 235,000 licenced firearms owners and those shooters under their immediate supervision. The likely answer is that shooters will simply not access safe shooting facilities and will instead resort to using public land or unregulated private farmland to conduct their shooting activities. This will cause a safety risk to both the shooting community and the general public.</p>
What are your views on the proposed system of enrolment, to replace the current approval process?	The NZDA supports the proposed transition from a certification system to a system of enrolment for non-pistol clubs. We believe this approach will significantly alleviate the	The existing certification process can be cumbersome and often unclear, especially for our volunteer administrators, who are the linchpins of club operations. We are aware of a significant processing backlog in range certification experienced by NZDA clubs, and also as reported by Police/FSA at FCAF meetings.

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	administrative burdens currently placed on these clubs. The simpler, more streamlined enrolment process could make it easier for clubs to comply with regulations while still maintaining high safety standards.	Volunteers manage clubs not only as a service to their communities but also out of a passion for promoting safe and responsible shooting. The transition to an enrolment system should prioritise simplifying the process to make it more accessible, reducing the time and resources required for compliance, and allowing volunteers to focus more on club activities and less on paperwork.
Should a club continue to be required to be an incorporated society when firearms and/or ammunition are sold on its behalf?	Yes, NZDA supports this.	<p>NZDA acknowledges the benefits of requiring non-pistol clubs to be incorporated societies, particularly in terms of legal structure, financial accountability, and governance in general. We note that NZDA requires all branches to be incorporated in order to become part of NZDA, which is in the best interest of our members.</p> <p>While we recognise the challenges this requirement can pose, especially for smaller or newly established clubs that might find the process daunting or impractical. Incorporation provides a formal structure that can enhance the credibility and accountability of clubs. It ensures:</p> <ol style="list-style-type: none"> 1. Legal Responsibilities are clear: Incorporation clarifies the legal responsibilities and liabilities of club officers and members. 2. Financial oversight: It provides a framework for public reporting on the Register and, therefore, financial oversight, crucial when clubs engage in transactions involving firearms and ammunition.

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What are your views on the enforcement mechanisms that would be available to ensure compliance with enrolment?	NZDA supports the proposal.	The NZDA supports the establishment of effective and fair enforcement mechanisms for the proposed enrolment system. These mechanisms are essential to ensure that all clubs adhere to the required safety and regulatory standards, thus maintaining the integrity and safety of shooting activities across the nation.
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?	NZDA understands the necessity of having a regulatory framework that includes penalties for non-compliance to ensure that all non-pistol clubs adhere to safety and legal standards. However, we advocate for a balanced approach that considers the clubs' primarily volunteer-driven nature and financial capabilities.	<p>While we acknowledge the need for a deterrent against non-compliance, the proposed maximum penalty of \$10,000 may be disproportionately high, especially for smaller or financially struggling clubs. Such a high penalty could potentially lead to the closure of clubs, which contradicts the broader goal of promoting safe and legal shooting activities.</p> <p>We suggest a graduated penalty system where fines start smaller (at \$750) and increase with repeated non-compliance or more severe breaches (in which case, \$10,000 may be appropriate). This system would provide clubs with an opportunity to rectify issues before facing harsher penalties.</p> <p>This is, therefore, in the interest of public safety, and we think a better safety outcome is to emphasise educational interventions for first-time offences. This approach supports clubs in achieving compliance through understanding and adaptation rather than punishment.</p>

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<p>Will the proposals ensure the safe possession and use of firearms within non-pistol shooting clubs?</p>	<p>Somewhat: NZDA supports the overall direction of the proposed measures for ensuring safety in non-pistol clubs, we emphasise the need for these measures to be practical, well-supported, and continuously refined based on feedback from the clubs themselves. By working collaboratively with clubs and focusing on education and support, we can achieve the shared goal of maintaining a safe and responsible shooting community.</p>	<p>NZDA's view is that both the registration system and the proposed enrolment system may not directly contribute to enhancing safety for users and the general public.</p> <p>This assertion is grounded in the understanding that the act of registration itself does not inherently improve operational safety practices or compliance with safety norms.</p> <p>Historical data from New Zealand shooting ranges, particularly those operated by the NZDA, demonstrate a longstanding record of safe operation with minimal incidents, and zero deaths. This suggests that these clubs already implement effective safety measures and adhere to rigorous standards voluntarily.</p> <p>Given this context, the necessity of government-imposed registration becomes questionable. If ranges are proven to be run safely and responsibly, as evidenced by the low incidence of accidents and adherence to the Firearms Safety Code, the additional layer of regulatory oversight through registration/enrolment may introduce unnecessary bureaucratic burdens without yielding significant improvements in safety outcomes. It raises a fundamental question: why impose a regulatory requirement that does not correlate with an increase in safety but potentially diverts resources and attention from proven safety practices already in place?</p>

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Do you agree with the overall policy proposals for non-pistol clubs?	<p>Overall, yes, NZDA agrees it is a step in the right direction. The NZDA strongly supports the proposed measures, focusing on enrolment and a more light-handed approach to regulating clubs, which we think will still ensure the safe possession and use of firearms within non-pistol clubs. We appreciate the government's intent to enhance safety however we also encourage a data-driven approach to regulatory changes. Our position is supported by historical data indicating that non-pistol ranges, particularly those operated by NZDA, have maintained an exemplary safety record, which questions the necessity for overly stringent regulations.</p>	<p>Given the lack of data suggesting that current or past regulatory frameworks have directly enhanced safety outcomes, we advocate for an enrolment system that acknowledges our clubs' proven safety record. Such a system should focus on maintaining accountability and promoting best practices without imposing unnecessary burdens that have not demonstrably increased safety.</p>

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What other suggestions do you have for regulating non-pistol clubs?	We encourage a risk-based and fact/data-based regulatory regime.	<p>By leveraging data, regulatory bodies can create robust, effective, and fair regulations based on safety rationale that better serve the public and range users. Basing regulation and safety on data-driven insights is important for several reasons:</p> <ol style="list-style-type: none"> 1) Evidence-Based Decision Making: Data-driven insights provide concrete evidence to support regulatory decisions. This reduces reliance on anecdotal evidence (Police opinion), leading to more rational and justifiable policies. 2) Increased Safety and Efficacy: Regulations informed by accurate data can more effectively identify risks and mitigate them. This leads to enhanced safety measures that protect individuals and communities. 3) Transparency and Accountability: Data-driven processes are transparent, as decisions are based on observable and verifiable information. This fosters public trust and holds regulatory bodies accountable for their actions. 4) Risk Management: Data-driven insights enable better risk assessment and management, allowing regulators to prioritise high-risk areas and allocate resources accordingly. <p>We encourage Justice to look at the data. To the best of NZDA's knowledge and belief, there is no data supporting the position that any safety benefits resulted from the extensive regulation of clubs and ranges since 2023. We firmly believe ranges operated by NZDA were safe prior to 2023. This is evidenced by the fact that on shooting ranges across New Zealand, there have been only 19 injuries caused by accidental shooting incidents since 1987, 15 of which occurred on pistol ranges. Four of the 15 incidents involved the military and police and were</p>

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		<p>not related to recreational shooters undertaking shooting activities. We are aware that only 4 injuries of the 19 occurred at long-arm ranges.</p> <p>At a recent FCAF meeting in June 2024, Police told attendees that only 3 accidental shootings occurred on ranges in the past few years, 2 involving pistols and one involving a black powder rifle, with no incidences occurring on smallbore or centrefire ranges. There have been no accident deaths or shootings on NZDA ranges. This illustrates that ranges are safe places and are operated safely because, despite the inherent risk (or perceived risk) posed by the use of firearms, no accidents or deaths occur. The reason for this is that shooters follow the Firearms Safety Code and are either licensed and/or supervised, and that clubs were already implementing safe systems that were not enhanced by registration.</p> <p>These facts, and the exemplary clubs' safety record over decades, highlight that the clubs' range network and their operators across New Zealand have a long-standing safety record. In summary, the data does not point to a need to regulate and register clubs for reasons of safety.</p>
Part C: Non-pistol shooting ranges		
<p>Do you agree with the issue statement for non-pistol ranges? What insights can you share that might help us understand the issue better?</p>	<p>Yes, NZDA agrees with the issue statement.</p>	<p>The statement rightly identifies the safety risks associated with non-pistol ranges as not outweighing the burdens imposed by the certification process and its required five-yearly renewals. This observation aligns with our understanding and the feedback from NZDA range operators who find the certification process both costly and time-consuming and was largely a rubberstamping of the existing ranges in situ. Most of the work was done to</p>

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		<p>prepare paperwork to submit for certification, and in the case of NZDA, all our ranges are compliant and safe.</p> <p>Historically, before the 2020-2023 regulatory changes, ranges were effectively managed under a system of governance by parent organisations. NZDA had developed a range manual and range officer training system, which we still use in the latter case. This system was not only less burdensome but also demonstrated no significant safety failings, indicating that NZDA ranges were operating safely under less stringent regulatory oversight.</p> <p>NZDA notes that our national hunter training programme, known as the HUNTS programme, has been directly and negatively impacted because many clubs do not have access to a certified range in their area. The current clubs and range systems have undermined NZDA's mission to train more hunters across our branches.</p> <p>We believe that a regulatory framework that reduces unnecessary burdens while maintaining high safety standards can be achieved by leveraging the proven effectiveness of past oversight mechanisms by parent bodies. This would not only alleviate the administrative and financial pressures on range operators but would also ensure that these facilities continue to serve their crucial roles in promoting safe and responsible shooting practices and are fit for the shooting needs of their organisation.</p>

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What are your views on removing certification for non-pistol ranges?	NZDA supports the removal of certification.	<p>Eliminating this requirement can significantly reduce the administrative and financial burdens currently placed on range operators without compromising the safety and integrity of shooting activities. We see no safety risk in this approach, especially if clubs can opt to use the conservative range and ballistic templates in the Police Range Manual.</p> <p>The current certification process is both time-consuming and expensive, which can be particularly challenging for volunteer-run or small-scale operations. Removing these requirements would allow range operators to allocate resources more effectively towards enhancing range facilities and safety training programs.</p>
What are your views on requiring non-pistol ranges to comply with shooting range standing orders approved by a governing body?	NZDA supports this proposal.	We advocate for maintaining essential safety practices through standardised operating procedures and range standing orders approved by a relevant governing body. NZDA is well placed to meet and oversee this approach, which focuses on practical safety measures rather than bureaucratic compliance, ensuring that ranges are safe without the need for formal certification.
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	Yes, educational and limited audit and review compliance tools would be appropriate.	We see no issue with the regulator's ability to carry out safety audits and reviews. While supporting the removal of certification, we propose the implementation of periodic safety audits or reviews to ensure ongoing compliance with safety standards. These audits should be constructive and aimed at supporting ranges in maintaining safety rather than penalising them for minor non-compliance.

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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?	Yes.	<p>Our submission is that the proposal moves New Zealand in a safer direction, namely because it will allow for more ranges to exist because ranges are a safe place to shoot firearms.</p> <p>At the time of the Police consultation in 2022, we noted in our view that over-regulation of ranges was inherently not safe and would result in a less safe outcome for users and the wider public. Our strong submission at that time was that over-regulation would have the opposite effect because those people would still shoot, just not on a range under the supervision of clubs and experts in ballistically safe areas.</p> <p>We note that under the proposals NZDA would be able to expand its HUNTS programme, which is currently limited to using the small certified range network. Our HUNTS Programme is a hunter education programme developed and delivered by NZDA via our branch network. Its purpose is to provide training to new hunters on the knowledge and skills required to be a safe, responsible and ethical hunter, including modules covering the safe handling of firearms, introduction to key firearms legislation and practical modules on the safe use of a firearm on a range and while hunting. HUNTS courses have been delivered throughout New Zealand since 1987 and since then, thousands of trainees have completed the programme. The HUNTS Standard Operating Procedures provide procedures and guidance for HUNTS Instructors and supporting staff for the delivery of HUNTS that ensure standards for instructors are adhered to, there is consistency across courses, there is appropriate risk assessment and management and the delivery of courses is done in accordance with regulatory requirements. Ready access shooting ranges are critical to the delivery of HUNTS courses</p>

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		<p>as the safe use of a firearm is critical to all hunters who choose to use firearms. There are provisions in place to ensure all use of shooting ranges on HUNTS courses is safe and managed. These provisions are that the entry criteria for a HUNTS trainee is 18 years of age (or minimum of 14 years of age if accompanied by a guardian), a firearms licence is not required, and immediate supervision is provided for all unlicensed trainees, trainees are encouraged to gain a firearms licence and are assisted with the application process, enrolment onto a HUNTS course will allow participation in the HUNTS course range shooting activities, and the HUNTS course includes a module on practical safe firearms handling and shooting techniques.</p> <p>The HUNTS course curriculum is designed to ensure that theoretical knowledge and basic practical skills are taught to a HUNTS trainee. Firearms and marksmanship are a fundamental core module of the HUNTS course. Elements (a) to (e) are delivered and demonstrated on a shooting range:</p> <ul style="list-style-type: none"> a) Demonstrate the laws relating to firearms and observe the seven basic rules of firearms safety contained in the Firearms Safety Code b) Demonstrate maintenance of a hunting rifle (at home and in the field) c) Zero a scoped rifle with hunting ammunition d) Demonstrate knowledge of and the principles of marksmanship (position and hold, alignment, sighting, trigger control) e) Demonstrate knowledge of bullet placement and to achieve a clean dispatch <p>The Part 6 regulations have undermined the delivery of NZDA's long-standing HUNTS programme because many branches who want to run HUNTS courses cannot access a certified range or get a temporary range certified.</p>

Question	Submission Position	Explanation
Do you agree with the overall policy proposals for non-pistol ranges?	Yes, NZDA agrees with this overall policy proposal.	
What other suggestions do you have for regulating non-pistol ranges?	N/A	N/A