



NATIONAL RIFLE ASSOCIATION OF NEW ZEALAND INC.

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National Rifle Association of New Zealand NRANZ.

Submission on the Police Discussion Document – Arms Regulations: Review of Fees 2022.

NRANZ is a target shooting sporting organisation for the sport of long range Fullbore Target Shooting.

NRANZ is a member of the New Zealand Shooting Federation, NZSF.

NRANZ is a member of the International Confederation of Fullbore Rifle Associations, ICFRA.

NRANZ is a member of the Coalition of Licenced Firearms Owners, COLFO.

Our members and teams regularly compete in international competitions, both in New Zealand and overseas.

In 2023 we have a 14-member New Zealand representative team attending the ICFRA F Class World Championships in South Africa.

In 2024 we have a 25-member Open Target Rifle Team and an 8 member Under 25 Target Rifle Team competing in the ICFRA World Long Range Championships in South Africa.

We normally have international competitors attending our annual National Championships where they compete for the Ballinger Belt, New Zealand's oldest national sports trophy.

NRANZ strongly supports and endorses COLFO's submission on the Review of Fees 2022.

Throughout the Review of Fees, apart from the section dealing with obtaining an individual Firearms Licence and the processes, the rest of the document generally treats everyone as being a commercial operator or being in a commercial operation.

This assumption leads to the presumption that you can pass on costs or spread them across commercial quantities of goods or transactions.

The process completely ignores the private, non-commercial, use areas which Police have deemed need to be permitted.

There is also regular reference to efficiency, which is not, and cannot, be tested or proven. Police have written the Regulations, and then had them approved by Government.

Police are charged with enforcing these Regulations.

Police have now set up a "Firearms Business Unit" to administer the Regulations.

Police have now set out their proposed charges for carrying out the processes, which they have designed.

Police have a monopoly on the delivery of the services, rightly so in the case of enforcement, but with no competition for the delivery of the services for which they are proposing to charge fees, they are charging to cover the business that they have built.

Efficiency cannot be measured nor in any way guaranteed by this organisational set up. A monopoly is never efficient or needing to be at all prudent about their charges for any service.

Much of these proposed fees continues the Police bias against licenced firearms owners in New Zealand since March 2019.

The Royal Commission found that it was a lack of Police guidelines, training and adherence to the existing licencing regime that resulted in the terrorist getting a FAL.

Trust has been lost in Police Headquarters by our members because of their actions and blaming the licenced firearm owners and the clubs in the wake of the shootings.

Firstly, with the heavy-handed approach taken with our clubs and ranges, and now wanting to charge individuals that wish to take part in international sport in particular by pricing it beyond the reach of many New Zealanders, and then charging our visitors more than their airfares just to get their necessary Visitors FAL and Import Permits.

Individual Firearms fees proposals.

In Section 2.6 and 2.7. Both sections make reference to subsidies "*creating excess demand*". When it comes to the promotion of public safety, the last thing when it comes to firearms training and licencing is "*excess demand*."

Firearms use and training should be fully supported for anyone with an interest in using firearms, having access to firearms, or needing to use firearms, no matter how casual or irregular the use is.

The more people that have undergone training, and eventually licencing, the safer the community.

Question 1.

Safety Training Course costs.

This should be fully funded as it is of major public benefit that as many people as possible are trained in the safe storage and handling of firearms.

Question 2.

Licence fees.

Suggestion.

That the fee for a Firearms Licence be set at no more than 25% of the proposed cost.

How can the effect of any cost above 25% cost recovery be known, only speculated.

Any charge considered by the Firearms Licence holder as being excessive will result in non-compliance, and more firearms moving to the grey or black markets.

NRANZ contends that anything above 25% cost recovery will result in non-compliance.

The proposed charges also have an allowance for compliance costs.

No other section of society pays for compliance in their licence fee.

Drivers only pay for compliance when they are fined.

Society benefits from having firearms used by licenced and trained users.

Question 3.

NRANZ supports the ability to pay off the Firearms Licence fee over time.

First time applicants for a licence are often younger or less financially established members of society and the cost of obtaining the training and a licence should be encouraged and easily achieved.

There should be a way for lower income members of society to pay overtime to encourage them to obtain a licence.

Question 5.

Yes, to a discount for early application.

If the fee is set at 25% cost recovery, then a 10% reduction is fair although financially not much of an incentive.

At any higher level of cost recovery, the reduction should be 20-25% as the main problem is police inefficiency in processing. The early application should encourage some efficiency.

Question 6.

No to full cost recovery of cost from Dealers.

Suggestion.

There needs to be more categories under the general heading that is Dealers.

The definition of a Dealer is now so broad that a full cost recovery will drive many now classified as Dealers out of servicing Licenced Firearms Owners.

The Regulations now assumes that anyone classified as a Dealer is a commercial operator, apart from museum curators.

One area that needs to be addressed is Gunsmiths, as they are now classified as Dealers.

To give some perspective to this classification, it is like saying a car mechanic is a car dealer, and we all know they are not the same thing.

In the case of Gunsmiths, there should be acknowledgement of their knowledge and the service and safety that they provide.

Firearms Dealers/Retailers do not often have the technical skills to fit suppressors, repair faulty or malfunctioning firearms, or replace inaccurate barrels.

The mechanics, the Gunsmiths, do.

How are these things a safety issue.

Suppressors prevent hearing damage to the firearm user and those nearby.

Faulty or malfunctioning firearms are a risk to the user and those around them.

Inaccurate barrels are a humane issue as an inaccurate rifle will not hit the target where it is aimed, resulting in wounded or injured animals.

Target barrels wear out and lose accuracy so need to be replaced.

Gunsmiths provide a service often not available at Dealers/Retailers.

Many Dealers/Retailers have a local gunsmith that does this work for them.

High charges are going to drive Gunsmiths away from doing this work.

It is now difficult to simply send a firearm to be repaired in a different town or city from your home. Most courier companies no longer accept firearms for transportation.

NRANZ knows of several very knowledgeable and competent Gunsmiths that are used regularly by our members that have indicated if these charges come in as proposed, they will be surrendering their "Dealers Licence".

Gunsmiths are often retired or older, very knowledgeable machinists or have a fitter welder or other technical background.

They are as needed in the community as mechanics for cars and should not be penalised just because Police wanted to simplify their classification system.

Question 7.

No to the same fee to renew.

If nothing has changed in the last year, it should be a quick tick box exercise.

Anything else is revenue generation on behalf of Police.

Renewal of Dealers/Gunsmiths Licence.

A Gunsmith will have a FAL, many also have, and need endorsements to service the various firearms legally held in the community.

Why is the cost of renewal any different to the cost of renewing their Firearms Licence and any endorsements.

It is just because Police have now classified them as a Dealer.

It is nothing more than Police looking to turn the licencing system into a regular income stream to justify their "Firearms Business Unit".

Question 8.

Dealer's fees should be a variable fee.

It should reflect the work on the part of Police, but also respect the nature of the Dealers Business that they are charging for this fee.

Museum Curators have been recognised as different to Dealers.

Gunsmiths should be recognised as different to Dealers if they are not trading in firearms.

Question 13.

Visitors Firearms Licence Fee.

No to full cost recovery.

The fee in the past was set at 10% of the NZ FAL fee as the permit is a 12 month one.

The vast majority of visitors are in the country for a few weeks to a month, so actually needed for 0.4% to 0.8% of a 10 year licence.

In the Proposal Advantages, it is stated that *"the fee is unlikely to deter people from visiting New Zealand for sporting events or recreational hunting."*

NRANZ already has it in writing, in response to an invitation to the National Rifle Association of Australia to send teams to attend the NRANZ National championships in 2024, that if the proposed charges for a Visitors Firearms Licence, in conjunction with the Import Permit for Firearms fee, and the Import Permit for Ammunition fee, are introduced as proposed, they will be unlikely to get any nominations for selection for their team.

No, the charges will not *"deter"* visitors. **They will stop them.**

The Proposals Impact Statement states that *"additions to Crown revenue would be minimal,*

but the change would mean that visitor related activities are not subsidised by New Zealand based licence holders". More Police nonsense statements.

The Crown will actually lose out on all of the revenue that comes from having tourists in the country.

Police cannot see past their own firearms empire when they talk about NZ FAL holders subsidising visitors.

If a cost is not fully recovered from the application, then it is subsidised by the Crown.

Police are Crown employees and as such need to look beyond their "Firearms Business Unit" and the need to justify the empire they have built.

The proposed fee is very much out of line with charges in other countries for Visitors Licences.

Australian States typically charge between A\$50 and A\$100,(the rifle import fee is waived if you are attending a competition for which you have and invitation or have entered), USA no charge, UK 30 pounds or 150 pounds for a group/team application, South Africa no charge, Canada C\$25.

New Zealand proposal \$420-\$470, not much efficiency in evidence here, only empire building.

NZ Police have designed a Visitors FAL application process which is also very complex and basically does not recognise an overseas Firearms Licence, by making applicants undergo the New Zealand licencing process. They have created the work required.

Many of the countries that NRANZ has competitions with have firearms licencing processes equally as thorough as New Zealand's and the visitor's licences should recognise that process.

There was no submission process on the way Police have set up their visitor licencing system.

Question 33.

Suggestion.

Align with international practice and charges.

Support tourism and competition for New Zealand shooting organisations.

In conjunction with questions 32, 33 and 34.

Suggestion.

Have one fee which covers Visitors FAL, Firearm Import Permit and Ammunition Import Permit when it is all lodged at the same time and is for the use by the individual applying, as outlined in the next section.

The proposed Visitors Firearms Licence fee needs to be viewed in conjunction with the proposed Firearm Import Permit fee questions 32 and 33, and the proposed Ammunition Import Permit fee question 34.

The proposed charges are all geared towards commercial operations.

The Section 6.4 Issue Statement outlines the 6000 applications for 62,145 firearms and the average of 748,940 rounds of ammunition per import permit.

The reason for showing these numbers is to show the average number of firearms or numbers of ammunition that are imported with the respective permits, and to justify

charging for commercial transactions.

NRANZ is not interested in averages, or commercial transactions, but with supporting individuals with their travels and ensuring a continuation of international competition in New Zealand.

Most international visitors applying for a visitors FAL are also bringing their own firearm/s with them and in many instances the ammunition for that firearm.

There is no recognition in the proposals for the fact that a Visitors Firearms Licence application will also have with it an application for a Firearms Import Permit and an application for an Import of Ammunition Permit.

To charge a fee for each of these applications when it is one set of forms is double or triple dipping at its best, and just another example of the process not being thought out, done efficiently, and solely focused on commercial import permits.

Based on the figures proposed, the cost for a visitor to come to New Zealand, apply for a Visitors FAL and bring their own firearm/s and ammunition is in the range of \$1260- \$1440.

The firearm and the ammunition come into the country as personal baggage with the visitor.

All competition shooters and many recreational hunters will only use their own firearm.

In the case of a competition firearm, it is normally a custom fit to the competitor.

Ammunition for the type of rifles that a visitor to NRANZ National Championships has been all handloaded by the competitor and cannot be purchased "off the shelf".

IATA, International Air Travel Association, has a limit of 5 kg of ammunition per passenger.

For NRANZ visitors this is about 180 rounds.

This may sound like a lot but for a NRANZ visiting competition shooter is often barely enough to shoot the New Zealand championships.

Question 33.

Suggestion.

Have a simple fee, if any, for New Zealand residents temporarily removing their firearm and ammunition from New Zealand, and then returning to New Zealand with the same firearm and any of said ammunition.

One form to cover the export and import of the firearm/s and ammunition when travelling with said firearm and ammunition as personal baggage.

Explanation.

The Firearm/s Import permit is also required for New Zealand residents returning from overseas competition.

Many New Zealand competition shooters would also be taking ammunition out of the country with them for their competition firearms, if it is not all used in the competitions, they will want to bring it home.

Dumping it in many countries is not an option.

As outlined at the start, NRANZ has a team of 25 shooters attending the World Long Range Championships in South Africa in 2024.

For this team of 25 to just bring their rifles home, at the bottom end of the proposed fee range of \$420-\$470, NZ Police will charge this team \$10500 for their Import Permits to come home.

That is just for the firearms without any ammunition.

That is a hell of a fee for NZ Police to take off New Zealanders for representing their country. Once the Firearms register is eventually operational individuals will probably need to have an export permit from Police to temporarily remove their firearm from the country. Police will probably want to charge \$420-\$470 for this permit too.

As stated earlier there is nothing in the proposals that recognises the individual and their needs as opposed to commercial transactions.

Question 31.

Agree with no fee for mail order and domestic internet sales.

Question 36.

A replacement FAL should cost no more to replace than a replacement driver's licence, for example.

This submission was prepared for NRANZ by
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